

VOLUME 1



DRAFT ENVIRONMENTAL IMPACT REPORT

ROWLAND HEIGHTS PLAZA AND HOTEL PROJECT

ROWLAND HEIGHTS, LOS ANGELES COUNTY, CALIFORNIA

STATE CLEARINGHOUSE No: 2015061003

PROJECT No. R2014-01529

VESTING TENTATIVE PARCEL MAP No. PM072916

CONDITIONAL USE PERMIT No. 201400062

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PARKING PERMIT No. 201400006

ENVIRONMENTAL ASSESSMENT 201400121

JANUARY 2016

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ROWLAND HEIGHTS, LOS ANGELES COUNTY, CALIFORNIA

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EXECUTIVE SUMMARY

This chapter of the Draft Environmental Impact Report (Draft EIR) is prepared pursuant to the California Environmental Quality Act (CEQA) for the proposed Rowland Heights Plaza and Hotel Project (Project or proposed Project). In accordance with State *CEQA Guidelines* Section 15123, this chapter provides a brief description of the Project; identifies significant environmental impacts and proposed mitigation measures or alternatives that would reduce or avoid those impacts; describes areas of controversy known to the lead agency; and presents issues to be resolved.

A. PROJECT LOCATION

The Project is located on the 14.06-acre property at 18800 Gale Avenue in the unincorporated Los Angeles County (County) community of Rowland Heights and the contiguous 0.79 acre property located within the City of Industry adjoining the 14.06-acre County property (Project Site or Site). The Project Site is located within a corridor of light industrial and commercial uses lining the Pomona Freeway (SR-60) between the Orange Freeway (SR-57) on the east and the San Gabriel River Freeway (I-605) on the west, in the eastern San Gabriel Valley. Fronting onto Gale Avenue on the south, the Project Site is adjacent to the Rowland Heights Plaza Shopping Center on the east and The Concourse Business Park on the west. The Project Site is bordered on the north by the shared Union Pacific Railroad Los Angeles Subdivision tracks/Metrolink Riverside Line (UPRR/Metrolink), and by Railroad Street north of the tracks. The Project Site was previously used for agricultural cultivation and is currently developed with a temporary detour road between Railroad Street and Gale Avenue, construction access road and construction staging area, and temporary surface parking established by the Alameda Corridor-East Construction Authority (ACE) for use during construction of the nearby Nogales Street Grade Separation Project. Portions of the eastern edge of the Project Site have also been paved and striped to provide temporary parking for the Rowland Heights Plaza Shopping Center, replacing stalls displaced by construction of the Nogales Street Grade Separation Project.

B. PROPOSED PROJECT

The Project would subdivide the portion of the Project Site in the unincorporated County into three parcels. Parcel 1 (8.75 gross acres/8.18 net acres), comprising the eastern portion of the Project Site, would be developed with approximately 129,926 gross square feet (gsf) of retail, restaurant, and commercial uses (Commercial Center). As part of the Vesting Tentative Parcel Map filed for the Project, 155 commercial condominium units would be created on Parcel 1, the Commercial Center. Parcel 2 (3.38 gross acres/3.22 net acres) would be developed with a full-service hotel with 275 guestrooms and suites, meeting rooms, and a restaurant, totaling approximately 189,950 gsf. Parcel 3 (1.93 gross and net acres) would be developed with an extended-stay hotel with 202 guestrooms and suites and totaling 130,930 gsf. The developed square footage for the three parcels would total approximately 450,806 gsf. The average floor-area ratio (FAR) on the portion of the Project Site in the unincorporated County is 0.74:1.

The Project Site would front onto Gale Avenue, with primary vehicular access to be provided by a new shared driveway on Gale Avenue between the commercial uses on Parcel 1 and the hotels on Parcels 2 and 3. A secondary new driveway on Gale Avenue near the western Project Site boundary would provide access to the hotels on Parcels 2 and 3. An additional driveway entrance to Parcel 1 would be also provided from the

existing Gale Avenue driveway shared with the Rowland Heights Plaza Shopping Center, along the eastern Project Site boundary; the Project Applicant has designed this road to meet public standards in the event it is dedicated as public in the future at the recommendation of the County. Anticipated parking demand would be accommodated on the Project Site, with 1,161 spaces to be provided on existing parcels in both the County and City of Industry through a combination of subterranean structured parking and surface parking.

Discretionary and administrative land use approvals required for the Project are anticipated to include, but may not be limited to, the following:

- **Zone Change** (from M-1.5 to a C-3-(DP) zoning designation for Parcels 2 and 3 for hotel use);
- **Vesting Tentative Parcel Map** to subdivide the unincorporated portion of the Project Site into three parcels (including ground space and air space for 155 commercial condominiums units within the Commercial Center to be developed on Parcel 1);
- **Conditional Use Permit to authorize:** i) a Development Program (DP) in conjunction with the proposed Zone Change for Parcels 2 and 3 for hotel uses and to allow the hotel structures to exceed 45 feet above grade (Los Angeles County Code [LACC] 22.40.040 and 22.44.132.D.4.b); ii) a commercial shopping center containing more than three business establishments (Rowland Heights Community Plan, Land Use Policy 8.g; LACC 22.56.010 and 22.56.040); iii) the sale of a full-line of alcoholic beverages for on-site consumption in conjunction with the operation of the hotels (LACC 22.28.210.A and 22.56.195); and iv) on-site grading of more than 100,000 cubic yards of soil (LACC 22.32.130.A);
- **Parking Permit** to authorize reduced on-site parking due to shared use of parking facilities by two or more uses within the development (LACC 22.56.990.C.1); and to authorize a valet-managed parking program for the hotels developed within the Project (LACC 22.56.990.C.2);
- **Certification of the Project EIR;** and
- **Administrative approvals**, including demolition, grading, excavation, foundation, and building permits; Drainage Concept Review by the County Department of Public Works, Land Development Division and Flood Maintenance Division; U.S. Army Corps of Engineers 404 Permit, California Department of Fish & Wildlife Section 1603 Permit (Streambed Alteration Agreement), and Regional Water Quality Control Board 401 Permit for undergrounding of on-site storm drain channel; other permits and approvals as deemed necessary.

C. PUBLIC REVIEW PROCESS

As further described in Chapter 1.0, Introduction, the County circulated a Notice of Preparation (NOP) to State, regional, and local agencies, and members of the public for a 30-day review period, commencing June 5, 2015 and ending July 6, 2015. Early input was also sought from other County departments prior to public circulation of the NOP. The NOP was based on an Initial Study which determined that the Project had the potential to result in significant impacts to the environment. The NOP and Initial Study are provided in Appendices A-1 and A-2 of this Draft EIR.

In addition, a public scoping meeting was held June 18, 2015 at the Rowland Heights Public Library, 1850 Nogales Street, Rowland Heights, CA 91748. Letters and comments received prior to and during the comment period and scoping meeting materials are included in Appendices A-3 and A-4 of this Draft EIR.

This Draft EIR will be released for a minimum 45-day public comment period. Following the public comment period, a Final EIR will be prepared that includes responses to the comments on the Draft EIR.

D. AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

The following summarizes the environmental concerns raised in response to the NOP, including comments raised orally at the public scoping meeting held during the NOP circulation period. The public comments are included in Appendix A-4 and raise the following issues:

- Traffic Study needs to reflect conditions after completion of the Nogales Street Grade Separation Project
- Traffic counts should be taken at the proposed shared driveway
- Traffic congestion, circulation, and parking impacts
- Zone change and more intense use of the Site
- Project and cumulative traffic back up from the SR 60 off ramp
- Traffic Study components, contents, methodology
- Recycling and solid waste disposal
- Impacts on the existing sewer system
- Water connection and service
- Project noise impacts
- Air quality analysis methodology, thresholds, and mitigation measures

E. SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

Significant unavoidable impacts could occur as a result of Project impacts. Based on the analysis contained in Chapter 4.0, Environmental Impact Analysis, the Project would result in significant and unavoidable impacts as follows:

- Operational air quality impacts
- Operational traffic impacts at two intersections under Future (2020) With Project Plus Cumulative Traffic conditions

F. ALTERNATIVES TO REDUCE SIGNIFICANT IMPACTS

The State *CEQA Guidelines*, Section 15126.6(a) require an EIR to “describe the range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but will avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” The State *CEQA Guidelines* emphasize that the selection of project alternatives be based primarily on the ability to reduce significant impacts relative to the proposed project, “even if these alternatives would impede to some degree the attainment of the project objectives, or

would be more costly.”¹ The State *CEQA Guidelines* further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are analyzed.²

As described in detail in Chapter 5.0, Alternatives, of this Draft EIR, four alternatives to the Project were analyzed: the No Project/No Build Alternative, Reduced Intensity Alternative, and two Code-Compliant Alternatives that address other proposed uses on the Project Site. Based on an analysis of these alternatives, an environmentally superior alternative is identified.. In accordance with the State *CEQA Guidelines* requirement to identify an environmentally superior Alternative other than the No Project/No Build Alternative, a comparative evaluation of the remaining Alternatives indicates that the Reduced Intensity Alternative would be the environmentally superior Alternative.

G. SUMMARY OF ENVIRONMENTAL IMPACTS

This section provides a summary of impacts, Project Design Features, mitigation measures, and level of impact after implementation of mitigation measures associated with Project. The summary is provided by environmental issue area below in **Table ES-1**, *Summary of Project Impacts, Project Design Features, and Mitigation Measures*.

¹ *State CEQA Guidelines, Section 15126.6(b)*.

² *Ibid, Section 15126.6(f)*.

Table ES-1

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
4.A Aesthetics			
<p>Impact Statement AES-1: The height of the two hotel buildings would contrast with the existing low-rise setting of the area. However, the Project’s design—including the articulation of roof features on the proposed hotel buildings, strong horizontal and vertical design features, color variations and coordination of the building design, landscaping and streetscape, setbacks, pedestrian amenities and open space within the Commercial Center on Parcel 1, and the Project’s consistency with applicable plans and regulations—would enhance the aesthetic value of the location.</p> <p>Because the Project would be well separated from residential uses to the south of SR-60 and would be a compatible use with surrounding commercial/industrial development, it would not substantially degrade the aesthetic character of the Site and its surroundings because of height, bulk, pattern, scale, character, and other features. Impacts with respect to visual character would be less than significant.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>	<p>Less than Significant</p>

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
<p>Impact Statement AES-2: Reflected light and new light sources associated primarily with the Project's signage, parking lot lights, and light spillage from windows would not substantially alter the character of the area surrounding the Project Site nor result in substantial light spill and/or glare onto adjacent light-sensitive receptors. Shading from the Project would not affect any shade-sensitive uses, such as dwelling units or parks. Therefore, potential impacts associated with nighttime illumination and/or glare from reflected sunlight and shading would be less than significant.</p>	Not Applicable	Not Applicable	Less than Significant
4.B Air Quality			
<p>Impact Statement AQ-1: Project uses, including hotel, retail, and restaurant uses, would be consistent with adopted regulatory policies and guidance regarding air quality. Impacts would be less than significant.</p>	Not Applicable	Not Applicable	Less than Significant
<p>Impact Statement AQ-2: Construction of the Project would not exceed the applicable SCAQMD daily numeric indicators for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Project-related construction emissions would result in a less than significant impact.</p>	<p>PDF-AQ-1: The Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and achieve the equivalent of USGBC LEED® Silver Certification. These measures would also include consistency with the Los Angeles County Green Building</p>	Not Applicable	Less than Significant

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
	<p>Standards and Low Impact Development requirements. The Project would incorporate measures and performance standards which include but are not limited to the following:</p> <ul style="list-style-type: none"> ▪ The Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous construction debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area. ▪ The Project would be designed to optimize energy performance and reduce building energy cost by 10 percent for new construction compared to ASHRAE 90.1-2010, Appendix G, and the Title 24 Building Standards Code. ▪ The Project would reduce indoor water use by a minimum of 35 percent by installing water fixtures that exceed applicable standards. 		
<p>Impact Statement AQ-3: Operational emissions from the Project would potentially exceed the threshold of significance for VOC and NO_x. As a result, operation of the Project would result in a potentially significant air quality impact for VOC and NO_x. At full buildout, the Project could</p>	<p>PDF-AQ-1, Green Building Measures</p>	<p>No feasible mitigation measures.</p>	<p>Significant and unavoidable (NO_x and PM₁₀)</p>

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
<p>potentially result in emissions that lead to a violation of an air quality standard or contribute substantially to an existing or projected air quality violation; thus operational impacts would be significant.</p>			
<p>Impact Statement AQ-4: Construction of the Project would not exceed the SCAQMD daily regional numeric indicators for emissions of ozone precursors (NO_x, VOC). The incremental change in interim operational emissions, when combined with concurrent Phase 2 construction emissions, would exceed the daily threshold of significance for VOC and NO_x. Peak-day operational emissions at full buildout of the Project would be less than those during operational/construction overlap, but would also exceed the SCAQMD daily regional numeric indicator for VOC and NO_x. As a result, operation of the Project would result in a potentially significant air quality impact for VOC and NO_x (ozone precursor). Thus, construction and interim operations of the Project would potentially result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is nonattainment, and impacts would be potentially significant. Project construction and</p>	<p>PDF-AQ-1, Green Building Measures</p>	<p>No feasible mitigation measures.</p>	<p>Significant and unavoidable (NO_x and PM₁₀)</p>

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
operational emissions would remain below numeric indicators for PM ₁₀ and PM _{2.5} .			
Impact Statement AQ-5: Impacts regarding the Project’s contribution to local CO and NO ₂ concentrations would be less than significant. Construction and operation of the Project would not exceed the SCAQMD localized significance thresholds for CO and NO _x at nearby sensitive receptors.	PDF-AQ-1, Green Building Measures	Not Applicable	Less than Significant
Impact Statement AQ-6: Impacts regarding the Project’s contribution to local PM ₁₀ and PM _{2.5} concentrations would be less than significant. Localized PM ₁₀ and PM _{2.5} emissions would not exceed the SCAQMD localized significance threshold.	PDF-AQ-1, Green Building Measures	Not Applicable	Less than Significant
Impact Statement AQ-7: Project impacts regarding the concentration of CO at intersections in the Project vicinity would be less than significant. The number of traffic trips generated by the Project would not contribute to the formation of CO hotspots in excess of the applicable standards.	Not Applicable	Not Applicable	Less than Significant
Impact Statement AQ-8: Impacts from the emission of TACs would be less than significant for Project construction and less than significant with respect to Project operations. Receptors are located	Not Applicable	Not Applicable	Less than Significant

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
<p>over 300 feet away from the Project Site. Based on this distance and the short-term nature of construction emissions, Project construction and operational TAC emissions would not result in a significant impact to off-site sensitive receptors. Therefore, the Project would result in a less than significant impact with regard to construction and operational TAC emissions.</p>			
<p>Impact Statement AQ-9: Construction and operation of the Project would not generate substantial odorous emissions. Construction equipment would comply with CARB anti-idling regulations to minimize diesel emissions. Architectural coatings would comply with CARB and SCAQMD regulations regarding VOC content.</p> <p>During operations, food would be prepared in indoor kitchen areas, and refuse would be maintained and disposed of in accordance with applicable regulations. As a result, the Project would not create objectionable odors affecting a substantial number of people and impacts would be less than significant.</p>	Not Applicable	Not Applicable	Less than Significant

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
4.C Biological Resources			
<p>Impact Statement BIO-1: The Project Site does not support any candidate, sensitive, or special status wildlife species. A single individual of southern California black walnut (CNPS Rank 4) was observed growing within the northern drainage channel; however, the CNPS Rank 4 is a low-level watch list sensitivity, and removal of one specimen from a highly disturbed location would not be considered an adverse effect to the species. Therefore, Project impacts would be less than significant for special status species.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>	<p>Less than Significant</p>
<p>Impact Statement BIO-2: The Project Site does not support any sensitive plant communities. Therefore, Project impacts would be less than significant.</p>	<p>Not Applicable</p>	<p>Not Applicable`</p>	<p>Less than Significant</p>
<p>Impact Statement BIO-3: The Project Site contains wetlands and supports jurisdictional waters of the U.S. and CDFW jurisdictional streambed and associated riparian habitat. Potentially significant impacts to wetlands could occur as the result of Project implementation.</p>	<p>Not Applicable</p>	<p>MM-BIO-1: Prior to the issuance of any grading permit for permanent impacts in the areas designated as jurisdictional features, the Project Applicant shall obtain a CWA Section 404 permit from the USACE, a CWA Section 401 permit from the RWQCB, and Streambed Alteration Agreement permit under Section 1602 of the California Fish and Game Code from the CDFW. The Project would impact: 1) 0.035 acres of federal wetland, 0.120 acres of USACE drainage, and</p>	<p>Less than Significant</p>

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
		<p>an additional 0.089 acres of USACE concrete/grouted riprap for a total of 0.209 acres of USACE jurisdictional resources; and 2) 0.316 acres of CDFW drainage, and an additional 0.089 acres of CDFW concrete/grouted riprap for a total of 0.405 acres of CDFW jurisdictional resources.. The following would be incorporated into the permitting, subject to approval by the regulatory agencies:</p> <ul style="list-style-type: none"> ▪ On- or off-site restoration or enhancement of USACE/RWQCB jurisdictional “waters of the U.S.”/“waters of the State” and wetlands at a ratio no less than 1:1 for permanent impacts, and for temporary impacts, restore impact area to pre-Project conditions (i.e., revegetate with native species, where appropriate). Off-site restoration or enhancement at a ratio no less than 1:1 may include the purchase of mitigation credits at an agency-approved off-site mitigation bank or in-lieu fee program within Los Angeles County. ▪ On- or off-site restoration or enhancement of CDFW jurisdictional streambed and associated riparian habitat at a ratio no less than 1:1 for permanent impacts, and for temporary impacts, restore impact 	

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
		area to pre-project conditions (i.e., revegetate with native species, where appropriate). Off-site restoration or enhancement at a ratio no less than 1:1 may include the purchase of mitigation credits at an agency-approved off-site mitigation bank or in-lieu fee program within Los Angeles County.	
<p>Impact Statement BIO-4: The Project Site does not function as a regional or local wildlife movement corridor and would not substantially interfere with movement of native wildlife species. However, the Project Site contains vegetation suitable for nesting birds. Therefore, the Project may result in significant impacts to nesting bird species that are protected under the California Fish and Game Code and the MBTA if removal, clearing, or grubbing were to occur during the general avian nesting season (February 15 to August 31).</p>	<p>Not Applicable</p>	<p>MM-BIO-2: Prior to the issuance of any grading permit that would require removal of potential habitat for raptor or other bird nests, the Project Applicant shall demonstrate to the satisfaction of the County of Los Angeles that either of the following have been or will be accomplished:</p> <ul style="list-style-type: none"> ▪ Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species 	<p>Less than Significant</p>

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
		<p>present, a qualified biologist may determine that a change in the breeding season dates is warranted.</p> <ul style="list-style-type: none"> ▪ If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning 30 days prior to the initiation of Project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 500 feet of the disturbance area. The surveys should continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of Project activities. If a protected native bird is found, the Project Applicant shall delay all Project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, Project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is 	

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
		<p>vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing shall be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the Project activities and the nest. Project personnel, including all contractors working on Site, shall be instructed on the sensitivity of the area. The Project Applicant shall provide the Department of Regional Planning the results of the recommended protective measures described above to document compliance with applicable State and federal laws pertaining to the protection of native birds.</p> <ul style="list-style-type: none"> ▪ If the biological monitor determines that a narrower buffer between the Project activities and observed active nests is warranted, he/she shall submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the Project activities and the nest and foraging areas) to the Department of Regional Planning and, upon request, the CDFW. Based on the submitted information, the Department of 	

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
		<p>Regional Planning (and the CDFW, if the CDFW requests) will determine whether to allow a narrower buffer.</p> <ul style="list-style-type: none"> ▪ The biological monitor shall be present on Site during all grubbing and clearing of vegetation to ensure that these activities remain within the Project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to Project activities. The biological monitor shall send weekly monitoring reports to the Department of Regional Planning during the grubbing and clearing of vegetation, and shall notify the Department of Regional Planning immediately if Project activities damage active avian nests. 	
<p>Impact Statement BIO-5: No oak trees are found on the Project Site, the only other regulated tree species. However, development of the Project would result in the removal of one unique native tree, the southern California black walnut (CNPS Rank 4), within a highly disturbed area. Therefore, Project impacts to unique native trees would be less than significant.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>	<p>Less than Significant</p>

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
4.D.1 Archaeological Resources			
<p>Impact Statement ARCHAEO-1: Implementation of the Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State <i>CEQA Guidelines</i>.</p>	<p>Not Applicable</p>	<p>MM-ARCHAEO-1: The Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards to oversee an archaeological monitor who shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be determined by the archaeological monitor based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus fill or young versus old soils), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Excavations into the Puente/Monterey Formation are not required to be monitored by the archaeologist since these sediments are too old to contain archaeological resources. Full-time field observation can be reduced to part-time inspections or ceased entirely if determined adequate by the qualified archaeologist.</p>	<p>Less than Significant</p>

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
		<p>MM-ARCHAEO-2: In the event that archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by a qualified archaeologist. The developer shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources if they are determined to be potentially eligible for the California Register or potentially qualify as unique archaeological resources pursuant to CEQA. The treatment plan may include preservation in place (if feasible) and/or the implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The developer, in consultation with the archaeologist and the County, shall designate repositories that meet State standards to curate the archaeological material recovered. Project material shall be curated in</p>	

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
		accordance with the State Historical Resources Commission's <i>Guidelines for Curation of Archaeological Collections</i> .	
		MM-ARCHAEO-3: The archaeological monitor shall prepare a final report at the conclusion of archaeological monitoring. The report shall be submitted by the Applicant or developer to the County, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures. The report shall include a description of resources unearthed, if any, treatment of the resources, and evaluation of the resources with respect to the California Register.	
Impact Statement ARCHAEO-2: Implementation of the Project could disturb human remains, including those interred outside of formal cemeteries.	Not Applicable	MM-ARCHAEO-4: If human remains are encountered unexpectedly during implementation of the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be	Less than Significant

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
		<p>the Most Likely Descendent (MLD). The MLD may, with the permission of the developer, inspect the site of the discovery of the Native American remains and may recommend means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete inspection and make a recommendation within 48 hours of being granted access by the developer to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.</p> <p>Upon the discovery of the Native American remains, the developer shall ensure that the immediate vicinity where the Native American human remains are located, according to generally accepted cultural or archaeological standards or practices, are not damaged or disturbed by further development activity until the developer has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The developer shall discuss all reasonable options with the descendants</p>	

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
		<p>regarding the descendants' preferences for treatment. Whenever the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the developer or the authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of PRC Section 5097.94, if invoked, fails to provide measures acceptable to the Applicant, the developer or the authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.</p>	
<p>4.D.2 Paleontological Resources</p>			
<p>Impact Statement PALEO-1: Implementation of the Project could directly or indirectly destroy a unique paleontological resource, as the site is underlain by a geological formation known to contain fossil localities in the Project vicinity. This is a potentially significant impact.</p>	<p>Not Applicable</p>	<p>MM-PALEO-1: A qualified paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter the Puente/Monterey Formation. The paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The</p>	<p>Less than Significant</p>

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
		<p>qualified paleontologist shall supervise a paleontological monitor who shall be present during construction excavations into Puente/Monterey Formation. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the paleontologist and shall be based on the rate of excavation and grading activities, proximity to known paleontological resources or fossiliferous geologic formations, the materials being excavated (native sediments versus artificial fill), and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time field observation can be reduced to part-time inspections or ceased entirely if determined adequate by the qualified paleontologist.</p>	
		<p>MM-PALEO-2: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. A buffer area of at least 25 feet shall be established</p>	

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
		<p>around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the paleontologist’s discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing and/or removal. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are curated. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a private research institue or a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository.</p>	
		<p>MM-PALEO-3: The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Project Applicant to the Lead Agency and the Natural History Museum of Los</p>	

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
		Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the Project and required Mitigation Measures.	
4.E Geology and Soils			
Impact Statement GEO-1: Project impacts related to fault rupture, seismic ground shaking, liquefaction and lateral spreading, erosion, subsidence, and collapse would be less than significant through compliance with applicable regulatory requirements and Project characteristics, including the recommendations of the Geotechnical Report and Updated Geotechnical Report.	Not Applicable	Not Applicable	Less than Significant
Impact Statement GEO-2: Because related projects are not near the Project Site and are small in scale and would not require mass grading, the Project, considered together with related projects would not result in a cumulatively considerable contribution to cumulatively significant grading and excavation impacts, or impacts related to the exposure of an increased local population to seismic hazards.	Not Applicable	Not Applicable	Less than Significant

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
4.F Greenhouse Gas Emissions			
<p>Impact Statement GHG-1: Impacts regarding the annual increase in GHG emissions would be less than significant. The Project would generate GHG emissions due to construction and operational activities; however, the net increase in annual GHG emissions, directly and indirectly, would constitute an equivalent or greater reduction from BAU than has been determined by CARB to be necessary to meet the goals of AB 32.</p>	<p>PDF-AQ-1</p>	<p>Not Applicable</p>	<p>Less than Significant</p>
<p>Impact Statement GHG-2: Construction and operation of the Project would not conflict with applicable GHG emissions reductions plans, policies, or regulations. As a result, construction and operation of the Project would not have a significance impact with respect to consistency with GHG reduction plans, and impacts would be less than significant.</p>	<p>PDF-AQ-1</p>	<p>Not Applicable</p>	<p>Less than Significant</p>
4.G Hydrology and Water Quality			
<p>Impact Statement HYDRO-1: Construction and operation of the Project would comply with all applicable regulatory requirements governing water quality. Compliance with applicable regulatory requirements and implementation of project design</p>	<p>Not Applicable</p>	<p>Not Applicable</p>	<p>Less than Significant</p>

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
features, including BMPs as part of the Project's SWPPP and County LID Ordinance compliance, would ensure that construction and operational water quality impacts are less than significant.			
Impact Statement HYDRO-2: The Project would largely be designed to maintain existing drainage patterns of the site and area. Post-development runoff would be consistent with applicable regulatory requirements; the post-Project site would not result in significant hydrology impacts downstream such that flooding or erosion would occur on or off site. Furthermore, the Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage. Compliance with applicable regulatory requirements and implementation of the project design features, including BMPs in accordance the County LID, would ensure that impacts regarding changes in drainage patterns and stormwater flows are less than significant.	Not Applicable	Not Applicable	Less than Significant
4.H Land Use And Planning			
Impact Statement LU-1: The Project would be substantially consistent with adopted regulatory policies in force at the time of the	Not Applicable	Not Applicable	Less than Significant

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
<p>submittal of the Project application, as well as guidance documents and regulations governing the allowable land uses on the Project Site. Land use impacts with respect to applicable plans would be less than significant.</p>			
<p>Impact Statement LU-2: With County approval of the Project’s requested zone change, CUPs, and Parking Permit, proposed uses would be consistent with allowable land uses and design parameters for the current and requested zoning designations. Impacts would be less than significant.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>	<p>Less than Significant</p>
<p>4.I Noise</p>			
<p>Impact Statement NOISE-1: On-site construction noise associated with the Project would exceed the established thresholds at nearby noise-sensitive receptor locations. Therefore, impacts would be significant.</p>	<p>PDF-NOISE-1: The Project contractor(s) would equip all construction equipment, fixed and mobile, with properly operating and maintained noise mufflers, consistent with manufacturers’ standards.</p>	<p>MM-NOISE-1: A temporary noise barrier shall be used to block the line-of-sight between construction equipment and the Best Western Plus Executive Inn hotel to the south across Gale Avenue (Location R1) during Project construction. The noise barrier shall be at least 12 feet tall with noise blankets capable of achieving sound level reductions of at least 9 dBA and placed along the southern boundary of active Project construction sites to reduce construction noise at the hotel, and may be combined with security fencing.</p>	<p>Less than Significant</p>

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
Impact Statement NOISE-2: Off-site construction traffic would not exceed the established thresholds at nearby noise-sensitive receptor locations. Therefore, impacts would be less than significant.	Not Applicable	Not Applicable	Less than Significant
Impact Statement NOISE-3: Project implementation would increase noise levels at adjacent noise-sensitive receptors in the Project area. However, Project-related noise would not exceed established thresholds; therefore, impacts would be less than significant.	Not Applicable	Not Applicable	Less than Significant
Impact Statement NOISE-4: Outdoor activities, operation of building mechanical/electrical equipment, etc. would not exceed noise levels at adjacent noise-sensitive receptors in the Project vicinity. Therefore, impacts would be less than significant with implementation of PDF-NOISE-2.	PDF-NOISE-2: As required by LACC, an acoustical analysis of the mechanical plans of the proposed buildings will be prepared by a qualified acoustical engineer, prior to issuance of building permits, to ensure that all mechanical equipment would be designed to meet noise limits in Table 4.I-7.	Not Applicable	Less than Significant
Impact Statement NOISE-5: Operation of the parking structure would not exceed noise levels at adjacent noise-sensitive receptors in the Project area. Therefore, impacts in this regard would be less than significant.	Not Applicable	Not Applicable	Less than Significant

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
<p>Impact Statement NOISE-6: Although the existing noise environment is deemed “normally unacceptable” based on the State’s Land Use Compatibility for Community Noise, proposed hotel uses would not be significantly impacted with implementation of the Project Design Feature PDF-NOISE-3.</p>	<p>PDF-NOISE-3 As warranted based on ambient CNEL levels at the Project Site, an acoustical analysis of the architectural plans of the proposed hotel buildings will be prepared by a qualified acoustical engineer prior to issuance of building permits to ensure that the building construction and design (i.e., exterior wall, window, and door) would include the required noise insulation features to demonstrate land use compatibility.</p>	<p>Not Applicable</p>	<p>Less than Significant</p>
<p>Impact Statement NOISE-7: Construction activities would result in sporadic, temporary vibration effects adjacent to the Project area, which would not exceed established thresholds. Thus, construction vibration impacts would be less than significant.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>	<p>Less than Significant</p>
<p>Impact Statement NOISE-8: Project implementation would not generate excessive vibration levels to nearby sensitive receptors. Thus, construction and operation vibration impacts would be less than significant.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>	<p>Less than Significant</p>
<p>4.J.1 Fire Protection and Emergency Services</p>			
<p>Impact Statement FIRE-1: The Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing fire station to maintain service due to</p>	<p>Not Applicable</p>	<p>Not Applicable</p>	<p>Less than Significant</p>

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
compliance with County Code and LACFD requirements that address fire flow, fire safety, emergency response times, and emergency access as well as the implementation of Project Design Features PDF-TRAF-1, PDF-TRAF-2, and PDF-TRAF-3. Therefore, construction and operational impacts would be less than significant.			
4.J.2 Sheriff Protection			
Impact Statement SHER-1: The Project would not require the addition of a new sheriff facility or the expansion, consolidation, or relocation of an existing sheriff station to maintain service due to the provision of on-site security features and security personnel, coordination with LASD, incorporation of crime prevention through environmental design features, Project Design Features related to traffic, and adequate response times. Impacts would be less than significant.	Not Applicable	Not Applicable	Less than Significant
4.K Transportation and Parking			
Impact Statement TRAF-1: Project-related construction traffic would result in less than significant impacts on pedestrian routes, and transportation safety in the Project vicinity with implementation of Project Design Feature PDF-TRAF-1.	PDF-TRAF-1: Prior to the issuance of grading permits, the Project Applicant, in coordination with LACDPW, will prepare a Construction Staging and Traffic Management Plan to be implemented during construction of the Project. The Construction Staging	MM-TRAF-1: The Project Applicant shall pay a fair-share contribution LACDPW or the City of Industry, as appropriate, to implement the following physical improvements at twointersections that would be potentially significantly impacted by	Less than Significant (Construction traffic impacts) Significant and Unavoidable (Operational traffic impacts at three intersections (Nos. 4, 10, and 18) under Future (2020) With Project

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
<p>Under Future (2020) With Project Plus Cumulative Traffic conditions, operational impacts would exceed the applicable County significance threshold at five intersections during the Saturday mid-day peak and one intersection during the A.M. and P.M. weekday peaks.</p>	<p>and Traffic Management Plan will identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of construction activities associated with the Project. The Construction Staging and Traffic Management Plan will also consider construction traffic and associated construction traffic noise from nearby simultaneous construction activities and pedestrian safety related to school routes. The Construction Staging and Traffic Management Plan will be subject to final approval by LACDPW.</p> <p>PDF-TRAF-2: The Project Applicant will install a three-way traffic signal at the primary Project Site entrance and Gale Avenue (Intersection No. 7), to provide traffic control for westbound/eastbound Gale Avenue and the southbound ingress/egress Project driveway.</p> <p>PDF-TRAF-3: The Commercial Center’s maximum permitted occupancy load for all restaurant uses will never exceed 1,561 occupants (including both customer and staff), and total restaurant floor area will not be less than 40,113 square feet nor more than 47,000 square feet. Restaurant occupancy loads will be determined by the County Division of Building and Safety in accordance with</p>	<p>the Project under Future (2020) With Project Plus Cumulative Traffic conditions:</p> <ul style="list-style-type: none"> ▪ Intersection No. 1 (Fullerton Road/Gale Avenue): The Project Applicant shall coordinate with the City of Industry to arrange a fair-share contribution towards the construction of an additional westbound left-turn lane at this intersection. The fair-share contribution shall be made in accordance with Table 8, Project Fair Share Contributions, of the approved Rowland Heights Plaza Traffic Impact Analysis, which requires the Project Applicant to contribute 97.9 percent of the estimated City of Industry cost to implement this improvement. ▪ Intersection No. 3 (Fullerton Road & SR-60 Freeway Eastbound Ramps): The Project Applicant shall coordinate with LACDPW to arrange a fair-share contribution towards the construction of a northbound through travel lane at this intersection. The fair-share contribution shall be made in accordance with Table 8, <i>Project Fair Share Contributions</i>, of the approved Traffic Impact Analysis, which requires the Project Applicant to contribute 81.1 percent of the estimated LACDPW 	<p>Plus Cumulative Traffic conditions)</p>

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
	<p>the California Building Code in effect at the time when restaurant floor plans are submitted for Director’s Review, as required by the Department of Regional Planning. Restaurant occupancy restrictions will be controlled through the Commercial Center Association’s CC&R. The Commercial Center Association (as maintained by the property manager) will:</p> <ul style="list-style-type: none"> - Keep records of each restaurant unit’s maximum occupancy load; - Track the Commercial Center’s total occupancy load; and - Have the authority to enforce each restaurant unit’s maximum permitted occupancy load. - Prior to applying for Director’s Review, each restaurant unit owner will obtain written authorization from the Commercial Center Association that confirms the occupancy load sought for permit complies with that unit’s maximum permitted occupancy in accordance with the CC&R. Restaurant owners will be prohibited from applying for a permit that seeks an occupancy load in excess of what is allowed or building out a unit in excess of that unit’s permitted maximum occupancy. - Once the Commercial Center Association has approved 	<p>cost to implement this improvement.</p>	

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
	restaurant uses within the Commercial Center with a total of 1,561 occupants, no further restaurant uses may be approved by the Commercial Center Association. Occupant loads may be reallocated among restaurant unit owners with the prior approval of the Commercial Center Association (and such approvals from the County and Director’s Review as are required by the County), but under no circumstances will the total occupant load for all restaurant uses in the Commercial Center exceed 1,561 occupants.		
Impact Statement TRAF-2: Implementation of the Project would not conflict with an applicable CMP including, but not limited to, level of service standards and travel demand measures, or other standards established by the CMP for designated roads or highways. The Project would not add ridership to nearby transit options that would significantly impact public transit service. This impact would be less than significant.	Not Applicable	Not Applicable	Less than Significant

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
Impact Statement TRAF-3: Implementation of the Project would not substantially increase hazards due to a design feature or incompatible use. This impact would be less than significant.	Not Applicable	Not Applicable	Less than Significant
Impact Statement TRAF-4: Project construction would result in a less than significant impact related to inadequate emergency access with implementation of Project Design Feature PDF-TRAF-1.	PDF-TRAF-1	Not Applicable	Less than Significant
Impact Statement TRAF-5: Implementation of the Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or the proposed vehicular or bicycle parking supply, otherwise decrease the performance or safety of such facilities. These impacts would be less than significant.	PDF-TRAF-3	Not Applicable	Less than Significant
4.L.1 Wastewater			
Impact Statement WW-1: Construction and operation of the proposed on-site wastewater collection system would not cause significant environmental impacts, and the existing downstream wastewater collection system has adequate capacity to accommodate wastewater generated by the Project. No new or expanded off-site wastewater collection or treatment	Not Applicable	Not Applicable	Less than Significant

Table ES-1 (Continued)

Summary of Project Impacts, Project Design Features, and Mitigation Measures

Environmental Impacts	Project Design Features (PDF-)	Mitigation Measures (MM-)	Level of Significance
facilities are required. Impacts would be less than significant.			
4.L.2 Water Supply			
Impact Statement WATER-1: The existing water system has adequate capacity to provide the additional water required by the Project. Impacts would be less than significant.	Not Applicable	Not Applicable	Less than Significant
Impact Statement WATER-2: Sufficient reliable water supplies are available to serve Project demand from existing entitlements and resources, considering existing and projected water demands from other land uses within the Rowland Water District. Impacts would be less than significant.	<p>PDF-WATER-1: The Project will use drought-tolerant and water efficient landscaping in accordance with the County’s Green Building Standards and the U.S. Green Building Council’s Leadership in Energy and Environmental Design (LEED®) Program, and will use low-flow fixtures (e.g., toilets, urinals, faucets, showerheads, etc.) and smart irrigation controls in accordance with the LEED® Program and Titles 20 and 24 of the CCR.</p> <p>PDF-WATER-2: Because existing recycled water pipelines are located in the Project vicinity, the Project Applicant will consult with the Rowland Water District regarding potential use of recycled water for Project Site landscape and irrigation as required by RWD’s Mandatory Recycled Water Connection Policy (Ordinance No. 0-7-2005 as updated by Ordinance No. 0-9-2010).</p>	Not Applicable	Less than Significant

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1. INTRODUCTION

1.0 INTRODUCTION

This Draft Environmental Impact Report (Draft EIR or EIR) has been prepared to assess the potential environmental impacts associated with the proposed commercial and retail hotel development, referred to in this EIR as the Rowland Heights Plaza and Hotel Project (Project). The Project is proposed to be located on a 14.06-acre property at 18800 Gale Avenue in the unincorporated Los Angeles County (County) community of Rowland Heights and on a contiguous 0.79-acre property located in the City of Industry (Project Site or Site). The Project Site is located along a corridor consisting of light industrial and commercial uses lining the Pomona Freeway (SR-60) between the Orange Freeway (SR-57) on the east and the San Gabriel River Freeway (I-605) on the west, in the eastern San Gabriel Valley. The Project Site fronts Gale Avenue on the south and is adjacent to the Rowland Heights Plaza Shopping Center on the east and The Concourse Business Park on the west. The Project Site is bordered on the north by the shared Union Pacific Railroad Los Angeles Subdivision tracks/Metrolink Riverside Line (UPRR/Metrolink), and by Railroad Street north of the railroad tracks. The Project Site was previously used for agricultural cultivation. Currently the Project Site is developed with a temporary detour road between Railroad Street and Gale Avenue, a construction access road and construction staging area, and temporary surface parking, established by the Alameda Corridor-East Construction Authority (ACE) for use during construction of the nearby Nogales Street Grade Separation Project. Portions of the eastern edge of the Project Site have also been paved and striped to provide temporary parking for the Rowland Heights Plaza Shopping Center, replacing stalls displaced by construction of the Nogales Street Grade Separation Project.

The Project would subdivide the portion of the Project Site in the unincorporated County into three parcels. Parcel 1 (8.75 gross acres/8.18 net acres), comprising the eastern portion of the Project Site, would be developed with approximately 129,926 gross square feet (gsf) of retail, restaurant, and commercial uses (Commercial Center). As part of the Vesting Tentative Parcel Map filed for the Project, 155 commercial condominium units would be created on Parcel 1, the Commercial Center. Parcel 2 (3.38 gross acres/3.22 net acres) would be developed with a full-service hotel with 275 guestrooms and suites, meeting rooms, and a restaurant, totaling approximately 189,950 gsf. Parcel 3 (1.928 gross and net acres) would be developed with an extended-stay hotel with 202 guestrooms and suites and totaling 130,930 gsf. The developed square footage for the three parcels would total approximately 450,806 gsf. The average floor-area ratio (FAR) on the portion of the Project Site in the unincorporated County is 0.74:1.

The Project Site would front onto Gale Avenue, with primary vehicular access to be provided by a new shared driveway on Gale Avenue between the commercial uses on Parcel 1 and the hotels on Parcels 2 and 3. A secondary new driveway on Gale Avenue near the western Project Site boundary would provide access to the hotels on Parcels 2 and 3. An additional driveway entrance to Parcel 1 would be also provided from the existing Gale Avenue driveway shared with the Rowland Heights Plaza Shopping Center, along the eastern Project Site boundary. Anticipated parking demand would be accommodated on the Project Site, with 1,161 spaces to be provided on existing parcels in both the County and City of Industry through a combination of subterranean structured parking and surface parking.

Discretionary and administrative land use approvals required for the Project are anticipated to include, but may not be limited to, the following:

- **Zone Change** (from M-1.5 to a C-3-(DP) zoning designation for Parcels 2 and 3 for hotel use);
- **Vesting Tentative Parcel Map** to subdivide the unincorporated portion of the Project Site into three parcels (including ground space and air space for 155 commercial condominiums units within the shopping center to be developed on Parcel 1);
- **Conditional Use Permit to authorize:** **i)** a Development Program (DP) in conjunction with the proposed Zone Change for Parcels 2 and 3 for hotel uses and to allow the hotel structures to exceed 45 feet above grade (Los Angeles County Code [LACC] 22.40.040 and 22.44.132.D.4.b); **ii)** a commercial shopping center containing more than three business establishments (Rowland Heights Community Plan, Land Use Policy 8.g; LACC 22.56.010 and 22.56.040); **iii)** the sale of a full-line of alcoholic beverages for on-site consumption in conjunction with the operation of the hotels (LACC 22.28.210.A and 22.56.195); and **iv)** on-site grading of more than 100,000 cubic yards of soil (LACC 22.32.130.A);
- **Parking Permit** to authorize reduced on-site parking due to shared use of parking facilities by two or more uses within the development (LACC 22.56.990.C.1); and to authorize a valet-managed parking program for the hotels developed within the Project (LACC 22.56.990.C.2);
- **Certification of the Project EIR;** and
- **Administrative approvals** including demolition, grading, excavation, foundation, and building permits; Drainage Concept Review by the County Department of Public Works, Land Development Division and Flood Maintenance Division; U.S. Army Corps of Engineers 404 Permit, California Department of Fish & Wildlife Section 1603 Permit (Streambed Alteration Agreement) and Regional Water Quality Control Board 401 Permit for undergrounding of on-site storm drain channel; and other permits and approvals as deemed necessary.

A. PURPOSE OF THE DRAFT EIR

The purpose of this Draft EIR is to inform decision-makers and the public of the environmental impacts resulting from the Project. The County is the Lead Agency under the California Environmental Quality Act (CEQA) responsible for preparing this Draft EIR. This Draft EIR has been prepared in conformance with CEQA (California Public Resources Code Section 21000 et seq.) and the State *CEQA Guidelines* (California Code of Regulations, Title 14, Section 15000 et seq.). The principal State *CEQA Guidelines* sections governing content of this document are Sections 15120 through 15132 (Contents of an EIR) and Section 15161 (Project EIR).

The County is responsible for processing and approving the Project pursuant to CEQA Statute Section 20167. The County will consider the information in this Draft EIR, along with other information that may be presented during the CEQA process, including the Initial Study and a Final EIR. The EIR will be used in connection with all other permits and all other approvals necessary for the construction and operation of the Project. The EIR will be used by the County's Department of Regional Planning; Department of Public Works, including the Divisions of Land Development, Geotechnical and Materials Engineering, Traffic and Lighting, Environmental Programs, Sewer Maintenance, and Land Development; and other responsible public agencies that must approve activities undertaken with respect to the Project.

In accordance with Section 15121 of the State *CEQA Guidelines*, this Draft EIR provides specific information regarding the environmental effects associated with development of the Project Site and ways to minimize any significant environmental effects through mitigation measures or reasonable alternatives to the Project. For some effects, significant environmental impacts cannot be mitigated to a level considered less than significant; in such cases, impacts are considered significant and unavoidable. In accordance with Section 15093(b) of the State *CEQA Guidelines*, if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts where impacts cannot be mitigated to less than significant levels), the agency must state in writing the specific reasons for approving the project, based on the Final EIR and any other information in the public record for the project. This is known as a “statement of overriding considerations.”

This document analyzes the environmental effects of the Project to the degree of specificity appropriate to the actions by the Project, as required under Section 15146 of the State *CEQA Guidelines*. This analysis considers the actions associated with the Project to determine the short-term and long-term effects associated with their implementation. This EIR discusses both the direct and indirect impacts of this Project, as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects. CEQA requires the preparation of an objective, full-disclosure document to inform agency decision-makers and the public of the direct and indirect environmental effects of the proposed action, including mitigation measures and reasonable alternatives that can reduce or eliminate any identified significant adverse effects.

B. EIR SCOPING PROCESS

In compliance with the State *CEQA Guidelines*, the County has taken steps to provide opportunities for government agencies and the public to participate in the environmental process. During the preparation of the Draft EIR, an effort was made to contact various Federal, State, regional, and local government agencies and other interested parties to solicit comments and inform the public of the Project. As further described below, this included the distribution of an Initial Study and Notice of Preparation (NOP), and noticing for and conducting of a Public Scoping Meeting.

1. Initial Study

In accordance with Section 15063(a) of the State *CEQA Guidelines*, the County undertook the preparation of an Initial Study. The Initial Study determined that the Project had the potential to result in significant impacts associated with a number of environmental issues. As a result, the Initial Study determined that this Draft EIR should address those issues where the Project could result in significant environmental impacts and consider mitigation measures.

The Draft EIR focuses primarily on changes in the environment that would result from the Project, individually and cumulatively with other development projects. The EIR identifies potentially significant direct and indirect impacts resulting from construction and operation of the Project, and provides Project Design Features and mitigation measures to reduce or avoid such effects. This Draft EIR addresses environmental effects in the following areas:

- Aesthetics
- Air Quality

- Biological Resources
- Cultural Resources
 - Archaeological Resources
 - Paleontological Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
 - Fire Protection and Emergency Services
 - Sheriff Protection
- Transportation and Parking
- Utilities and Service Systems
 - Wastewater
 - Water Supply

Based on the Initial Study, issues for which no significant impacts are anticipated to occur are addressed in Chapter 6.0, Other CEQA Considerations, of this Draft EIR. Other potentially significant impacts are discussed above even if they are identified under a different environmental issue on the County's Environmental Checklist Form. For example, some issues identified under Hazards and Hazardous Materials are addressed in Section 4.J, Fire Protection and Emergency Services, and Energy is addressed in Section 4.F, Greenhouse Gas Emissions and Chapter 6.0, Other CEQA Considerations. See also the Initial Study in Appendix A-2 of this Draft EIR.

2. Notice of Preparation

Pursuant to the provision of Section 15082 of the State *CEQA Guidelines*, the County circulated an NOP to State, regional, and local agencies and members of the public for a 30-day review period commencing June 5, 2015 and ending July 6, 2015. Early input was also sought from other County departments prior to public circulation of the NOP. The purpose of the NOP was to convey that the County was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. See Appendix A-1 of this Draft EIR.

3. Public Scoping Meeting

The NOP included notification that a public scoping meeting would be held to inform public agencies and other interested parties of the Project and to solicit input regarding the Draft EIR. The meeting was held June 18, 2015 between 6:00 P.M. and 8:00 P.M. at the Rowland Heights Public Library, 1850 Nogales Street, Rowland Heights, CA 91748. The meeting provided interested individuals, groups, and public agencies the opportunity to provide oral and written comments to the Lead Agency regarding the scope and focus of the

Draft EIR, as described in the NOP and Initial Study. See Appendix A-3 of this Draft EIR for Scoping Meeting Materials.

4. Comments Received

Four written comment letters responding to early consultation with other County departments and five written comments responding to the publicly circulated NOP/Initial Study were submitted to the County by the State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit; the State of California, Department of Transportation (Caltrans); the South Coast Air Quality Management District (SCAQMD); the County Sanitation Districts of Los Angeles County; and the County of Los Angeles Fire Department. In addition, approximately five individuals attended the public scoping meeting. Two comments were received orally (see Appendix A-4), and one Public Input Form was submitted regarding the scope and content of the Draft EIR. Comments received prior to and during the NOP circulation period are provided in Appendix A-4 of this Draft EIR, and are summarized in the Executive Summary, Subsection D, Areas of Controversy/Issues to be Resolved, in this Draft EIR. These comments are also addressed throughout this Draft EIR where applicable.

C. FORMAT OF THE DRAFT EIR

The Draft EIR includes an Executive Summary, nine Chapters, and appendices, which are organized as follows:

Executive Summary. This section of the Draft EIR provides an overview of the entire document in a concise, summarized format. It briefly describes the Project (location and key Project features); outlines the CEQA review process and focus; identifies impacts found to be significant and unavoidable; identifies areas of controversy; provides a summary of the Project alternatives (descriptions and conclusions regarding comparative impacts); provides a summary of Project impacts, Project Design Features, and mitigation measures; and defines the level of impact significance following implementation of mitigation measures.

1. **Introduction.** This section provides a summary of the Project, describes the purpose of the Draft EIR, and summarizes the organization of the Draft EIR.
2. **Project Description.** This section describes the location, objectives, and physical and operational characteristics of the Project, and defines necessary approvals.
3. **General Description of Environmental Setting.** This section presents an overview of the Project's environmental setting, including on-site conditions and surrounding land uses. This section also provides a list and mapped locations of past, present, and probable future projects considered in the analysis of potential Project contributions to cumulative impacts.
4. **Environmental Impact Analysis.** This section contains the environmental setting, methodology, threshold of significance, Project characteristics and design features, Project and cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance after mitigation for each of the environmental issues defined in Section B.1 above.

5. **Alternatives.** This section describes a reasonable range of alternatives to the Project, including the No Project/No Build Alternative, a Reduced Intensity Alternative, and two Code Compliant Alternatives that evaluate other proposed uses on the Project Site. This section also evaluates the environmental effects of the alternatives for each issue area analyzed in the Draft EIR.
6. **Other CEQA Considerations.** This section includes a discussion of issues required by CEQA not covered in other chapters. This includes significant unavoidable impacts, reasons why the Project is being proposed notwithstanding significant unavoidable impacts, significant irreversible environmental changes, energy, growth-inducing impacts, potential secondary effects caused by the implementation of the mitigation measures for the Project, and effects found not to be significant.
7. **References.** This section lists the references and sources used in the preparation of this Draft EIR.
8. **List of EIR Preparers and Organizations and Persons Contacted.** This section lists the persons, public agencies, and organizations consulted or who contributed to the preparation of this Draft EIR.
9. **Acronyms and Abbreviations.** This section provides a listing of the common acronyms and abbreviations used throughout this document.

The Environmental Analyses in this Draft EIR are supported by the following appendices:

- Appendix A – Notice of Preparation (NOP), Initial Study, Scoping Meeting Materials, and NOP and Scoping Meeting Comments
 - A-1 NOP
 - A-2 Initial Study
 - A-3 Scoping Meeting Materials
 - A-4 Scoping Meeting Sign-In Sheet and NOP Comments
- Appendix B – Air Quality Data Worksheets
- Appendix C – Cultural Resources Documentation
 - C-1 Native American Consultation Documentation
 - C-2 Paleontological Records Search Results
- Appendix D - Geotechnical Reports
 - D-1 Geotechnical Investigation and Liquefaction Evaluation
 - D-2 Update of Geotechnical Report and Conceptual Grading Plan Review
- Appendix E – Greenhouse Gas Emissions Data Worksheets

- Appendix F – Hydrology Study and Low Impact Development
 - F-1 Hydrology Study
 - F-2 Low Impact Development
- Appendix G – Noise Data Worksheets
- Appendix H – Service Provider Correspondence
 - H-1 Fire Department Correspondence
 - H-2 Sheriff’s Department Correspondence
- Appendix I – Traffic and Parking
 - I-1 Traffic Impact Assessment
 - I-2 Parking Assessment
- Appendix J – Utilities and Service Systems
 - J-1 Sewer Capacity Study
 - J-2 Water Supply Availability Supporting Information
- Appendix K – Alternatives Analysis
 - K-1 Air Quality, Greenhouse Gas Emissions, and Noise Data Worksheets for Alternatives
 - K-2 Trip Generation Worksheets for Alternatives

D. PUBLIC REVIEW OF THE DRAFT EIR

The Draft EIR is subject to a 45-day review period during which the document is made available to responsible and trustee agencies and interested parties. In compliance with the provision of Sections 15085(a) and 15087(a)(1) of the State *CEQA Guidelines*, the County, serving as the Lead Agency, has circulated a Notice of Availability (NOA) of the Draft EIR to property owners within 1,000 feet of the Project Site; occupants of properties contiguous to the Project Site; and public agencies, organizations and individuals that commented on the NOP or have requested such notice in writing.

The NOA indicates the Draft EIR will be available for review at the following locations:

- Los Angeles County, Department of Regional Planning website – <http://planning.lacounty.gov/case/view/r2014-01529>
- Los Angeles County Department of Regional Planning, Land Divisions Section – 320 West Temple Street, Room 1382, Los Angeles, CA 90012
- Rowland Heights Public Library – 1850 Nogales Street, Rowland Heights, CA 91748
- Diamond Bar Public Library – 21800 Copley Drive, Diamond Bar, CA 91765
- Hacienda Heights Public Library – 16010 La Monde Street, Hacienda Heights, CA 91745

The NOA indicates that the County will prepare and transmit a Notice of Completion (NOC) to the State Clearinghouse. Proof of publication is available at the County. All comments on the EIR should be addressed to:

Mr. Steven Jones
County of Los Angeles County
Department of Regional Planning
Land Divisions Section
320 West Temple Street, Room 1382
Los Angeles, CA 90012
Tel: 213-974-6433
sdjones@planning.lacounty.gov

Any agency, organization, or members of the public desiring to comment on the EIR must submit their comments in writing to Mr. Steven Jones prior to the end of the public review period. Upon the close of the public review period, the Lead Agency will then proceed to evaluate and prepare written responses to all relevant written comments received from both citizens and public agencies during the public review period. The County's responses at this point in the process will be limited to issues relating to the adequacy of the EIR, and not the relative merits of the Project.

The Final EIR will consist of the Draft EIR, corrections and additions to the Draft EIR, responses to comments addressing concerns raised by responsible agencies or reviewing parties, and a mitigation monitoring and reporting program. After the Final EIR is completed, and at least 10 days prior to its certification, a copy of the response to comments on the Draft EIR will be provided or made available to all commenting parties.

2. PROJECT DESCRIPTION

2.0 PROJECT DESCRIPTION

A. INTRODUCTION

Parallax Investment Corporation (Project Applicant) proposes a commercial retail-hotel development, referred to in this EIR as the Rowland Heights Plaza and Hotel Project (Project), on a 14.06-acre property located at 18800 Gale Avenue in the unincorporated Los Angeles County (County) community of Rowland Heights and on a contiguous 0.79-acre property located in the City of Industry (Project Site or Site). The Project Site is located along a corridor consisting of light industrial and commercial uses lining the Pomona Freeway (SR-60) between the Orange Freeway (SR-57) on the east and the San Gabriel River Freeway (I-605) on the west, in the eastern San Gabriel Valley. The Project Site fronts Gale Avenue on the south and is adjacent to the Rowland Heights Plaza Shopping Center on the east and The Concourse Business Park on the west. The Project Site is bordered on the north by the shared Union Pacific Railroad Los Angeles Subdivision tracks/Metrolink Riverside Line (UPRR/Metrolink), and by Railroad Street north of the railroad tracks. The Project Site was previously used for agricultural cultivation. Currently the Site is developed with a temporary detour road that crosses the Site between Railroad Street and Gale Avenue, construction access road and construction staging area, and temporary surface parking, established by the Alameda Corridor-East Construction Authority (ACE) for use during construction of the nearby Nogales Street Grade Separation Project. Portions of the eastern edge of the Project Site have also been paved and striped to provide temporary parking for the Rowland Heights Plaza Shopping Center, replacing stalls displaced by construction of the Nogales Street Grade Separation Project.

The Project would subdivide the portion of the Project Site in the unincorporated County into three parcels. Parcel 1 (8.75 gross acres/8.18 net acres), comprising the eastern portion of the Project Site, would be developed with approximately 129,926 gross square feet (gsf) of retail, restaurant, and commercial uses (Commercial Center). As part of the Vesting Tentative Parcel Map filed for the Project, 155 commercial condominium units would be created on Parcel 1, the Commercial Center. Parcel 2 (3.38 gross acres/3.22 net acres) would be developed with a full-service hotel with 275 guestrooms and suites, meeting rooms, and a restaurant, totaling approximately 189,950 gsf. Parcel 3 (1.93 gross and net acres) would be developed with an extended-stay hotel with 202 guestrooms and suites and totaling 130,930 gsf. The developed square footage for the three parcels would total approximately 450,806 gsf. The average floor:area ratio (FAR) on the portion of the Project Site in the unincorporated County is 0.74:1.

The Project Site would front onto Gale Avenue, with primary vehicular access to be provided by a new shared driveway on Gale Avenue between the commercial uses on Parcel 1 and the hotels on Parcels 2 and 3. A secondary new driveway on Gale Avenue near the western Project Site boundary would provide access to the hotels on Parcels 2 and 3. An additional driveway entrance to Parcel 1 would be also provided from the existing Gale Avenue driveway shared with the Rowland Heights Plaza Shopping Center, along the eastern Project Site boundary. Anticipated parking demand would be accommodated on the Project Site, with 1,161 spaces to be provided on existing parcels in both the County and City of Industry through a combination of subterranean structured parking and surface parking.

B. PROJECT LOCATION AND SURROUNDING USES

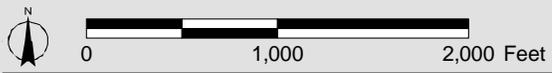
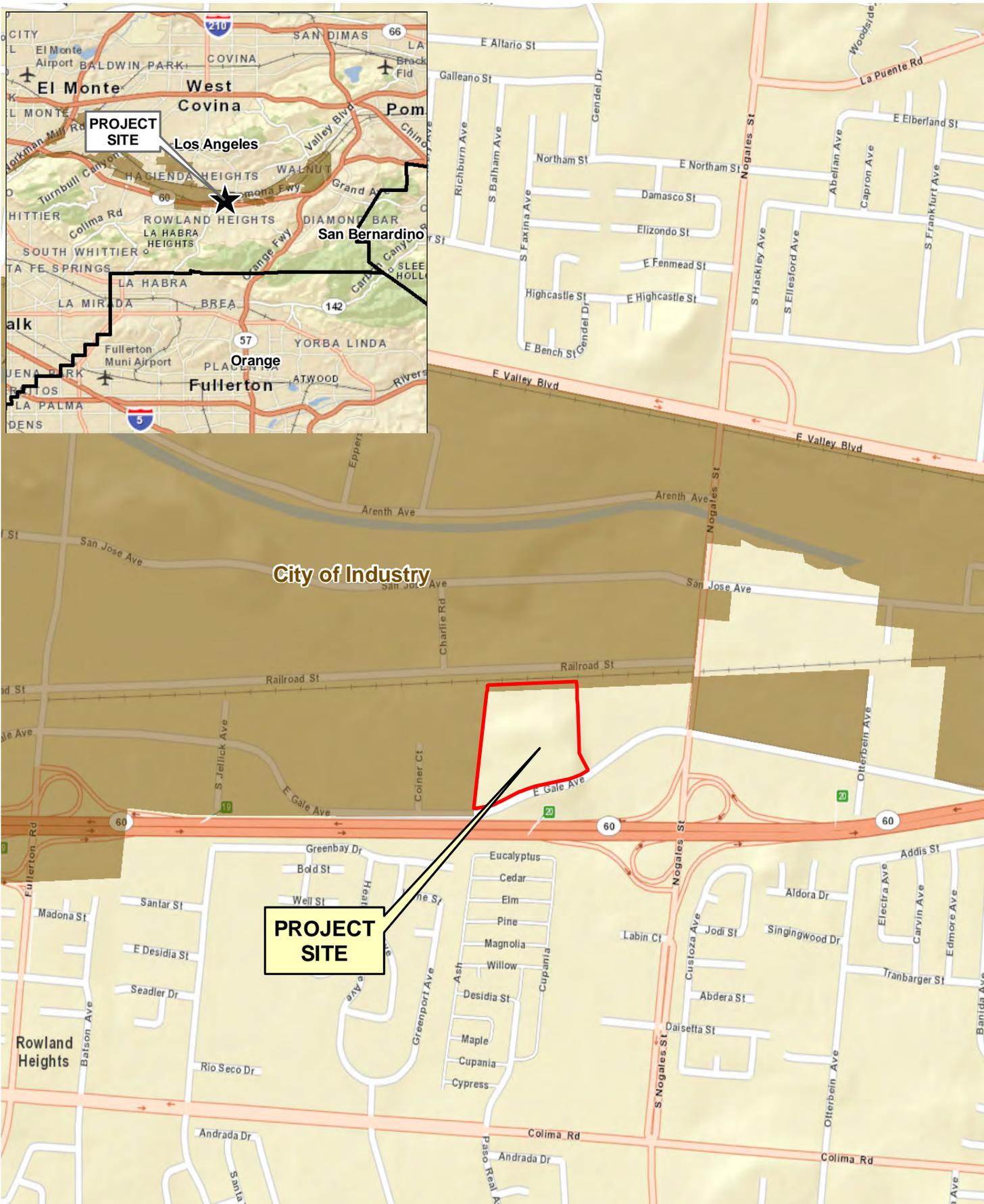
The Project Site is located within the unincorporated County community of Rowland Heights. Rowland Heights encompasses approximately 13.1 square miles in the eastern San Gabriel Valley, extending from the City of Industry on the north to the Los Angeles/Orange County border on the south, and from the City of Diamond Bar and SR-57 on the east to the unincorporated community of Hacienda Heights on the west. Rowland Heights is a predominantly low-density residential community, with two small clusters of light industry and commercial development along SR-60 between the Nogales Street and Fairway Drive interchanges; the majority of commercial development is concentrated along Colima Road south of SR-60. The southern portion of Rowland Heights includes large areas of undeveloped open space within the Puente Hills. The Project Site location is shown in **Figure 2-1**, *Regional and Vicinity Map*.

The Project Site is located within the concentration of light industrial and commercial uses centered on Nogales Street near its interchange with SR-60. This concentration is part of an approximately 14-mile-long corridor of predominantly industrial land uses, most of it contained within the City of Industry, that encompasses a half-mile-wide swath between SR-60 on the south and Valley Boulevard on the north, extending from SR-57 on the east to I-605 on the west. As shown in **Figure 2-2**, *Project Site and Surrounding Land Uses*, the jurisdictional border between the unincorporated County and the City of Industry wraps around the Project Site to the north and west. The majority of the Project Site, the southerly 14.06 acres, is within the unincorporated part of the County. The northernmost portion of the Project Site (Northern Parcel), a 50-foot-wide strip totaling 0.79 acres and representing a vacated (c. 1983) segment of Railroad Street south of the UPRR/MetroLink tracks, is located entirely within the City of Industry. The County/City boundary continues along the Project Site's western boundary.

Figure 2-3, *Oblique Aerial Photograph of Project Site*, shows the relationships between the Project Site and adjacent land uses. Land uses to the east are designated Industrial by the County. Land uses to the north and west, within the City of Industry, are designated Industrial and Commercial or Commercial/Industrial overlay, respectively. Land uses on the southern side of Gale Avenue are designated Commercial and Industrial by the County.

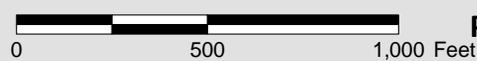
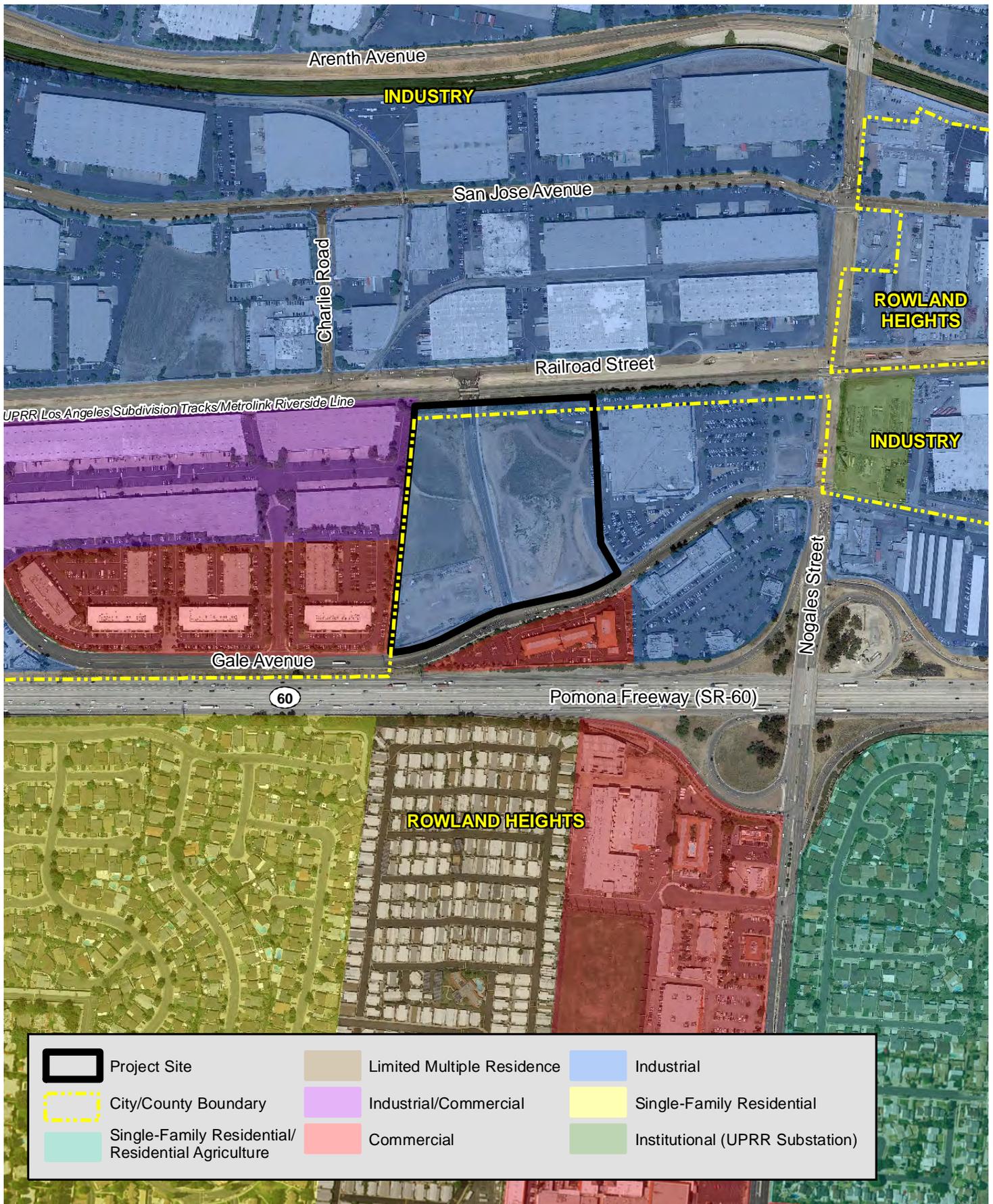
The Project Site fronts onto Gale Avenue on the south. A Best Western Plus Executive Inn hotel is located directly across Gale Avenue and Mandarin Plaza Shopping Center is located to the southeast. On the east, the Project Site is bordered by the Rowland Heights Plaza Shopping Center, which includes a 99 Ranch Market, retail stores, restaurants, and surface parking. The shopping center's western driveway, accessed from Gale Avenue, abuts the Project Site's eastern boundary, and provides access to the loading dock and parking to the rear (north) of the 99 Ranch Market.

On the north, the Project Site terminates at the southern limit of the UPRR/MetroLink right-of-way. The Southern California Regional Rail Authority, which operates MetroLink, Southern California's regional passenger rail system, shares UPRR's tracks for its Riverside commuter service line, primarily during peak commuter hours. Railroad Street and the Nogales Industrial Parks are located north of the tracks. Properties north of the Project Site are located in the City of Industry.



Regional and Vicinity Map

Rowland Heights Plaza and Hotel Project
 Source: ESRI Street Map, 2009; PCR Services Corporation, 2015.



Project Site and Surrounding Land Uses

Rowland Heights Plaza and Hotel Project
 Source: Google Earth, 2014-04-23 (Aerial); PCR Services Corporation, 2015.

FIGURE

2-2



Oblique Aerial Photograph of Project Site

Rowland Heights Plaza and Hotel Project

Source: Google Earth, 2014; PCR Services Corporation, 2014.

FIGURE

2-3

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On the west, the Project Site is bordered by The Concourse Business Park, which houses offices and wholesale commercial and light industrial operations. West of The Concourse Business Park, Gale Avenue is lined with the Four Seasons Shopping Center and additional wholesale commercial and manufacturing, storage, and distribution businesses. Properties to the west are located in the City of Industry.

The nearest residential uses are located across SR-60 to the south approximately 300 feet from the Project Site. These uses include the Rowland Heights Mobile Estates mobile home park and predominantly single-family residential neighborhoods, all accessed from Colima Road.

Local access to the Project Site is provided by Gale Avenue, a two- to four-lane roadway that provides access between Nogales Street to the east and Fullerton Road to the west. The southern Project Site boundary follows Gale Avenue and varies between 75 and 350 feet in distance north of SR-60. Both Nogales Street and Fullerton Road interchange with SR-60. The Nogales Street interchange is approximately one-half mile southeast of the Project Site. SR-57 is approximately four miles to the east and I-605 is approximately 8.5 miles to the west.

The Nogales Street Grade Separation Project, which is a component of the ACE project, is currently under construction approximately one-half mile east of the Project Site. The ACE project aims to improve rail transportation between the Los Angeles/Long Beach port complex and intercontinental railroad system through the improvement of mobility and elimination of grade separations in the San Gabriel Valley. The Nogales Street Grade Separation Project improvements will eliminate the at-grade train crossing at Nogales Street, which is a six-lane arterial that passes through the City of Walnut, City of Industry, and the Rowland Heights community, and will also result in a widening of Gale Avenue in the Project vicinity.

C. SITE BACKGROUND AND EXISTING CONDITIONS

The Project Site was used for agricultural cultivation through the mid-1990s and now has no on-site buildings. A partially channelized storm drain extends from near the Project Site's northeast corner, where it receives upstream flows from the County's 90-inch underground storm drain, to its northwest corner, where it discharges into the City of Industry's 94-inch underground storm drain. The storm drain currently supports willows and other riparian and upland vegetation, although it is periodically cleared as required by the County of Los Angeles and City of Industry Public Works Departments to maintain storm flow capacity. Other vegetation on the Project Site includes non-native grasses and brush that have colonized the former agricultural fields, and scattered trees, including palms, near the eastern edge of the property.

The Project Site has gently rolling topography and a maximum elevation differential of approximately 42 feet between its high point near the southeast corner at Gale Avenue and its low point in the northwest corner within the storm drain channel. In 2013, ACE constructed a three-lane detour road within a temporary construction easement on the Project Site, together with a temporary at-grade railroad crossing to the north, to provide north/south vehicular access between Railroad Street and Gale Avenue since construction of the Nogales Street Grade Separation Project necessitated the closure of Railroad Street at Nogales Street. The temporary detour road is known as New Charlie Road to distinguish it as the southern extension of existing Charlie Road north of the railroad tracks and Railroad Street. The roadway averages 40 feet in width, with a traffic signal at its intersection with Gale Avenue and warning devices/flashing lights at the railroad track crossing. It incorporates a paved pedestrian sidewalk along its eastern side and a dual concrete box

culvert/bridge crossing for the on-site storm drain. Temporary parking stalls were established on and adjacent to the Project Site to the east to replace Rowland Heights Plaza Shopping Center parking displaced by construction of the Nogales Street Grade Separation Project. Also, a construction access road accessed from Gale Avenue and a two-acre construction staging area (currently used for earthwork spoils) were constructed in the southeast corner of the Project Site. The alignment of the temporary New Charlie Road and access road on the Project Site, as well as the temporary parking stalls, are indicated in Figure 2-3, previously referenced.

The New Charlie Road detour, construction access road and staging area, and temporary parking will be in place for the projected three-year duration of the Nogales Street Grade Separation Project construction. Upon completion, the ACE Authority will demolish these improvements and restore the Project Site to its pre-construction vacant condition.

As part of the Nogales Street Grade Separation Project, Gale Avenue will be widened between 16 to 18 feet (i.e., eight to nine feet on each side) to create a four-lane road for a distance of 0.36 miles west of its intersection with Nogales Street, including the Project Site frontage. Gale Avenue's eastbound approach to Nogales Street will be reconfigured to accommodate two exclusive left-turn lanes, one through-lane, and one exclusive right-turn lane.

D. EXISTING PLANNING AND ZONING

The Project Site is within the Rowland Heights Community Plan Area, one of 19 adopted and several planned local plans that collectively comprise the Land Use Element of the adopted County General Plan. The community plans provide land use policy guidance at a finer scale than the regionally focused Countywide Elements. The Rowland Heights Community Plan was adopted in 1981 and has not been amended since; it is one of the oldest County local plans still in use. The County General Plan Land Use Policy Map designates the Project Site as Major Industrial. The Rowland Heights Community Plan Land Use Map designates the Site Industrial, with allowable land uses including manufacturing, warehousing, and heavy commercial.

The zoning designation for the portion of the Project Site in the unincorporated County is M-1.5-BE, where "M-1.5" denotes Restricted Heavy Manufacturing, which permits a broad range of industrial and commercial uses, including most commercial uses permitted in the C3 Unlimited Commercial zone, but prohibits (among other uses) heavy manufacturing, residential uses, and hotels or motels (considered transitory residential uses).¹ The "BE" designation denotes Billboard Exclusion, a zoning designation established to ensure that commercial and industrial properties remain free from outdoor advertising where such signs are deemed to represent hazards to pedestrians and motorists or detract from the visual appearance or economic base of an area.²

The Project Site is also subject to the requirements of the Rowland Heights Community Standards District (CSD), a special district with boundaries corresponding with the Rowland Heights Community Plan Area.³

¹ *Los Angeles County Code, Title 22, Planning and Zoning Code, Chapter 22.32.100 et seq.*

² *Ibid., Chapter 22.12.030(C) and Chapter 22.40, Part 3, Billboard Exclusion Zone.*

³ *Los Angeles County Code, Title 22, Planning and Zoning Code, Chapter 22.44, Part 2, Section 22.44.132, et seq, Rowland Heights Community Standards District (CSD), adopted 1981 and amended 2004.*

The CSD was established to ensure the compatibility of new development with adjacent residential uses, if any, and to impose development standards and review protocols to ensure that commercial development, associated signage, landscaping, and setbacks are appropriate for the community. For commercial and industrial land uses, specific development standards govern the maximum permitted lot coverage, front and side yard building setbacks, and landscaping requirements. In accordance with those standards, the Project Site is subject to various requirements, including a 40 percent lot coverage maximum and a minimum 15-foot landscaped setback from the property line along Gale Avenue (zero side/rear yard setback required adjacent to commercially zoned property). The CSD also governs signage types, dimensions, design, and location; a sign program is required for commercial centers of three or more businesses.⁴

The northernmost 0.79 acres of the Project Site (Northern Parcel) is located in the City of Industry, and is designated on the City's General Plan Land Use Map as Employment,⁵ for which allowable uses include a "variety of business and employment uses" including industrial, manufacturing assembly, warehousing, distribution, supporting offices and those commercial uses permitted under the Zoning Code, as well as parking.⁶ The corresponding zoning designation on the City's Zoning Map⁷ is "I" (Industrial, still listed in the City's Zoning Code with the prior Industrial designation "M"),⁸ which permits a broad range of commercial and industrial uses, including manufacturing. Special industrial development standards are applicable to some permitted uses and address parking and loading, landscaping, and the siting and design of fences and walls, outdoor lighting, and trash enclosures.

The Project Site spans two County supervisorial districts. The unincorporated portion of the Project Site is located within the Fourth Supervisorial District (Hon. Don Knabe) and the Northern Parcel, in the City of Industry, is within the First Supervisorial District (Hon. Hilda Solis).

E. PROJECT OBJECTIVES

The underlying purpose and primary objective of the Project is to provide for the development of a high-quality, integrated development of complementary commercial retail establishments and hotels that promote economic growth and job creation within a commercial and light industrial corridor. The specific objectives sought by the Project Applicant are provided below.

Commercial/Retail Objectives

1. Address the existing shortage of commercial retail options in the Project area (i.e., the southeastern San Gabriel Valley), and expand the variety of such options to serve Rowland Heights community residents.
2. Locate new commercial development in close proximity to existing commercial and light industrial uses to avoid displacing residential uses or introducing incompatible land uses, but in

⁴ CSD, *op. cit.*, Section D.2.a.v (applies to M-1.5 per Section D.5).

⁵ City of Industry, *General Plan Land Use Map*, adopted June 6, 2014;

⁶ City of Industry, *General Plan*, adopted June 2014; <http://www.cityofindustry.org/?p=city-hall&s=general-plan>. Accessed September 17, 2015.

⁷ City of Industry, *Zoning Map*, December 16, 2014; file:///C:/Users/A.Doehne/Downloads/ZoningUpdate141216.pdf. Accessed September 17, 2015.

⁸ City of Industry *Zoning Code*, Chapter 17.16.010.

- close proximity to the existing residential population south of the Project Site and SR-60, and the existing daytime employee population to the north, east, and west.
3. Take advantage of the large buildable lot area to develop a high-quality, low-rise commercial center with a diversity of tenant spaces (retail, restaurant, and office space on two floors) to attract high-quality tenants.
 4. Ensure a variety of commercial uses are accommodated — including retail, restaurant, and office uses — to provide a range of goods and services to the community.
 5. Promote and support local, regional, and State mobility objectives to reduce vehicle miles traveled and infrastructure costs, by siting new commercial infill development in proximity to existing local bus lines and a commuter rail station and providing facilities to support and encourage the use of bicycles.

Hotel Objectives

1. Accommodate the growing need for hotel options and meeting facilities that meet corporate and commercial demand generated by businesses in the San Gabriel Valley, leisure and tour group demand generated by pleasure travelers in the San Gabriel Valley and larger Los Angeles area, and group demand for social events and business and association meetings.
2. Provide a high-quality extended-stay hotel in the currently underserved eastern San Gabriel Valley market where no comparable hotel product exists and demand for longer-term stays for family vacationers and business travelers is increasing.
3. Provide business travelers with local options for hotel stays, thereby reducing vehicle miles traveled.
4. Site proposed new mid-rise hotels in a high-visibility location with freeway access.
5. Co-locate complementary hotel uses (at a height and scale appropriate for the commercial/industrial corridor in which the Project Site is situated, in conformance with Development Program review criteria) and commercial uses, including retail and restaurant uses, to provide local shopping and dining options for hotel guests.

Siting and Design Objectives

1. Create an activity node for the Project area and ensure a consistently high level of pedestrian activity during the day and the evening, by co-locating a sufficiently diverse concentration of hotels and commercial uses with different peak activity periods.
2. Maximize efficient use of the Project Site through the use of shared parking that accommodates peak demand for on-site uses.
3. Incorporate underground structured parking to minimize lot coverage dedicated to surface parking and take advantage of the natural slope of the Site.
4. Enhance the pedestrian experience along Gale Avenue, and provide street-level pedestrian connectivity to the Project Site through the provision of landscaped setbacks on the Project's street frontage, landscaped pedestrian walkways through the Project Site, and a dedicated pedestrian connection separate from vehicle driveways.

5. Provide on-site common open space amenities in response to community input related to visual enhancement of the parking field and for the use of Project patrons and employees.

Economic and Employment Objectives

1. Create a viable mix of complementary retail, office, and hotel uses of a sufficient size, to create internal synergy and attract outside patrons.
2. Contribute to the economic health of the Rowland Heights community through jobs creation, including short-term construction trade jobs and long-term service and professional employment opportunities.
3. Generate revenue for the County through net new sales and room taxes.

F. DESCRIPTION OF THE PROPOSED PROJECT

The Project would result in the subdivision of the parcel in the unincorporated County into three new parcels; the 0.79-acre parcel in the City of Industry would be retained with no change to the existing parcel boundaries.

Key Project components include the following:

- **Commercial Center (Parcel 1):** This parcel, fronting on Gale Avenue, totals 8.18 net acres and would be developed with four buildings housing a mix of retail uses, high-turnover and quality restaurants, and offices. The buildings would total approximately 129,926 gsf. Buildings 2 and 3 would be single story (24 to 27 feet in height to the roof parapet, with rooftop projections to 35 feet in height). Buildings 1 and 4 would be two stories tall (approximately 35 feet in height above finished grade to the roof parapet).
- **Full-Service Hotel A (Parcel 2):** This parcel, also fronting on Gale Avenue, totals 3.22 net acres and would be developed with a 275-room full-service hotel. Amenities would include ballrooms/banquet space, meeting rooms, a restaurant and bar, and an outdoor pool and lounge area. Hotel A would be approximately 189,950 gsf and six stories tall (72 feet in height above finished grade, with rooftop mechanical equipment up to 80 feet in height).
- **Extended-Stay Hotel B (Parcel 3):** This parcel, totaling 1.93 net acres, would be north of Parcel 2, the full-service Hotel A, at the rear of the Project Site. It would be developed with an extended-stay hotel encompassing 202 rooms. Amenities would include 202 guestrooms, meeting rooms, a breakfast lounge, and an outdoor pool and lounge area. Hotel B would be approximately 130,930 gsf and six stories tall (72 feet in height above finished grade, with rooftop mechanical equipment up to 80 feet in height).
- **Northern Parcel (City of Industry):** This parcel would be developed with surface parking and interior access drive aisles.

Details of the proposed development programs for the three parcels in the unincorporated County are described below and summarized in **Table 2-1, Project Development Summary**. Key Project components are depicted in **Figure 2-4, Conceptual Site Plan**, and the renderings in **Figures 2-5 through 2-10**.

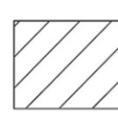
Table 2-1

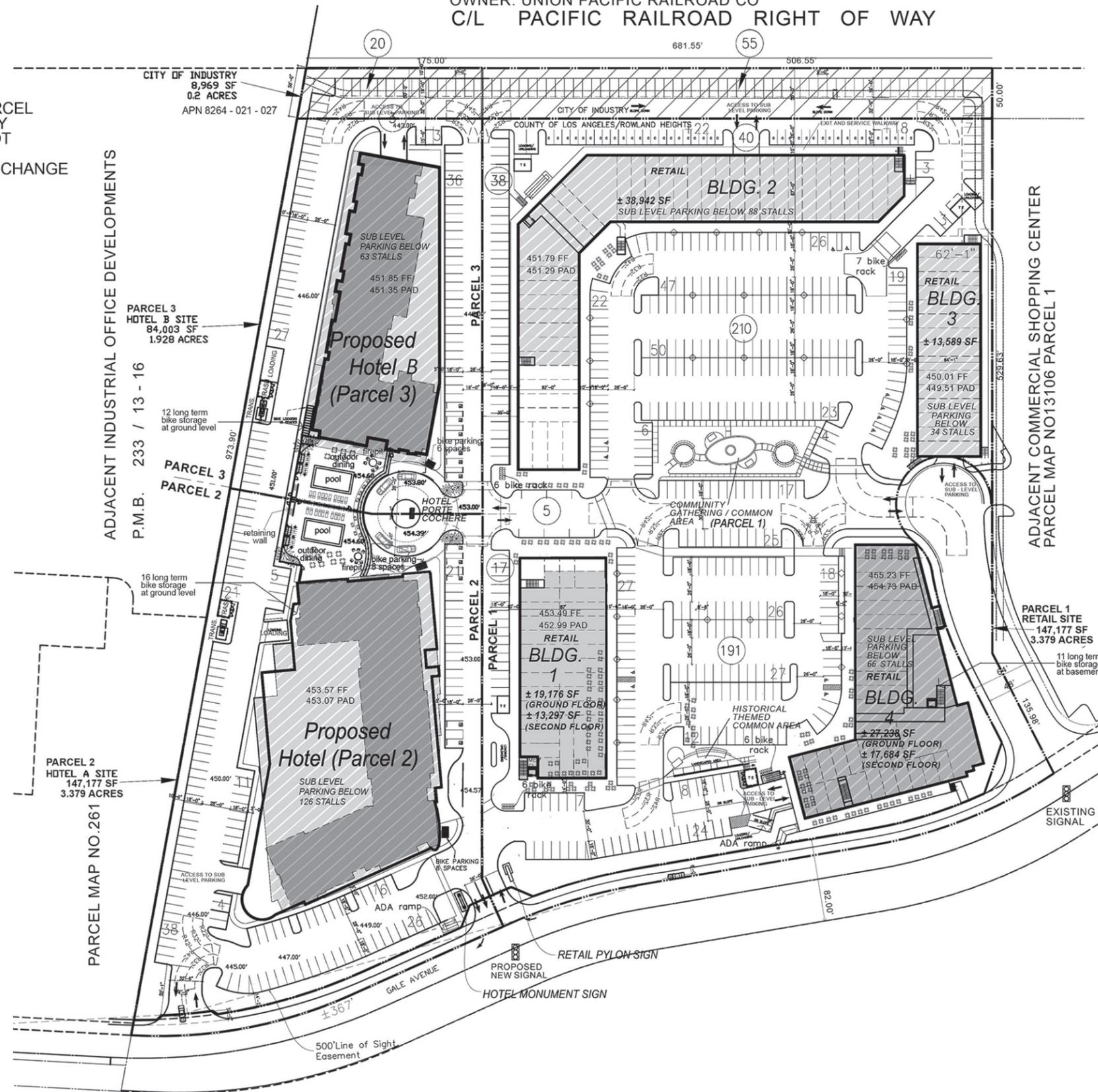
Project Development Summary

Proposed Use	Square Feet nsf = net square feet gsf = gross square feet
<u>Parcel 1, Commercial Center (8.18 net acres/356,387 nsf)</u>	
Retail Building No. 1 (two stories)	32,473 gsf
Retail Building No. 2 (one story)	38,942 gsf
Retail Building No. 3 (one story)	13,589 gsf
Retail Building No. 4 (two stories)	44,922 gsf
Parcel 1, Commercial Center Total	129,926 gsf (125,820 nsf)
Retail Floor Area (66% of Parcel 1, Commercial Center net floor area)	83,707 nsf
Restaurant Floor Area (32% of Parcel 1, Commercial Center net floor area) ^b	40,113 nsf
Office Floor Area (2% of Parcel 1, Commercial Center net floor area)	2,000 nsf
<u>Parcel 2, Full-Service Hotel A (3.22 net acres/140,260 nsf)</u>	
275 Guestrooms and Suites	157,250 gsf
Ballrooms/Banquet Rooms	10,000 gsf
Meeting Rooms	2,000 gsf
Restaurant	3,600 gsf
Bar	600 gsf
Kitchen	1,800 gsf
Storage, Office, and Other Space	14,430 gsf
Parcel 2, Full-Service Hotel A Total	189,950 gsf
<u>Parcel 3, Extended-Stay Hotel B (1.93 net acres/84,003 nsf)</u>	
202 Guestrooms and Suites; Ancillary Function Space; Storage, Office, and Other Space	130,930 gsf
Parcel 3, Extended-Stay Hotel B Total	130,930 gsf
<u>Northern Parcel (0.79 acres/34,307sf)</u>	
Parking Stalls	75
Sitewide Total Floor Area	450,806 gsf
<u>Parking Summary</u>	
Parcel 1	689 spaces
Parcel 2, Full-Service Hotel A	260 spaces
Parcel 3, Extended-Stay Hotel B	137 spaces
Northern Parcel (City of Industry)	75 spaces
Parking Total	1,161 spaces

^a The amount of restaurant/food service space, up to a maximum of 47,000 square feet, and the relative proportion of those uses to commercial uses within the Commercial Center may increase, since restaurant floor plans ultimately submitted for Director's Review may result in reduced occupancy loads than assumed in the Project Parking Analysis. The scenario presented in this table and evaluated in Section 4.K, Transportation and Parking, of this Draft EIR assumes the most conservative parking scenario.

Source: Parallax Investment Corp., Architects Orange, Gene Fong Associates, May 2015.

-  ADJACENT PROJECT PARCEL IN THE CITY OF INDUSTRY (APN 8264-021-027) IS NOT A PART OF PROPOSED LAND DIVISION OR ZONE CHANGE
-  SUB-LEVEL PARKING (WITH ONE STORY ABOVE)
-  SUB-LEVEL PARKING (WITH TWO STORY ABOVE)
-  SECOND / UPPER FLOOR AREAS



Conceptual Site Plan

Rowland Heights Plaza and Hotel Project
 Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2015.

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KEY PLAN



Proposed Project - Bird's-Eye View of Parcel 1 from Southeast

Rowland Heights Plaza and Hotel Project

Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2014.

FIGURE
2-5



KEY PLAN

Proposed Project - Bird's-Eye View of Parcel 1 from Southwest

Rowland Heights Plaza and Hotel Project

Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2014.

FIGURE

2-6



KEY PLAN

Proposed Project - View from Parcel 1 to Parcels 2/3

Rowland Heights Plaza and Hotel Project

Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2014.

FIGURE

2-7



KEY PLAN

Proposed Project - Commercial Parcel-Central Gathering/Common Area

Rowland Heights Plaza and Hotel Project
Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2014.

FIGURE

2-8



Proposed Project - Hotel A Entrance (Parcel 2)

Rowland Heights Plaza and Hotel Project

Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2014.

FIGURE

2-9



Proposed Project - Hotel B Entrance (Parcel 3)

Rowland Heights Plaza and Hotel Project

Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2014.

FIGURE

2-10

As part of the Project, the Project Applicant is requesting a Zone Change from M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion) to C-3-(DP) (Unlimited Commercial-Development Program) for Parcels 2 and 3 to accommodate the proposed hotel uses.

The Applicant is also requesting Conditional Use Permits (CUPs) to authorize:

- A Development Program associated with a proposed Zone Change on Parcels 2 and 3 for hotel uses and to allow structures to exceed the maximum height of 45 feet above grade by 35 feet (for a total of 80 feet) for Hotel A and by approximately 27 feet (for a total height of 72 feet) for Hotel B;
- A new commercial center containing more than three business establishments, as required by the Rowland Heights Community Plan;
- Grading in excess of 100,000 cubic yards of grading (192,000 total cubic yards of soil with 48,300 cubic yards of export anticipated); and
- The sale of a full line of alcoholic beverages for on-site consumption in conjunction with normal operations of the two proposed hotels.

Additional approvals sought by the Project Applicant include a Vesting Tentative Tract Parcel Map to create three parcels and 155 commercial condominium units in conjunction with the proposed retail shopping center and a Parking Permit to allow approximately 1,161 on-site parking spaces and 75 off-site parking spaces on a contiguous 0.79-acre parcel that is part of the Project Site but located in the adjacent City of Industry.

1. Parcel 1, Commercial Center

Parcel 1 (8.75 gross acres/8.18 net acres), , the Commercial Center, is adjacent to the Rowland Heights Plaza Shopping Center to the east and would be developed with commercial condominium units to accommodate retail, restaurant, and office uses. Four buildings would be arrayed around the perimeter of the parcel, surrounding a central surface parking lot and open space amenities. Storefronts in Building Nos. 1 and 2 would face east, toward the interior of the Commercial Center, with enhanced wall treatments facing Parcels 2 and 3 across the shared primary entrance driveway to the Project Site.

Building Nos. 1 and 4, along the Gale Avenue frontage of Parcel 1, would be two stories and approximately 35 feet in height above adjacent grade (to the roof parapet). Building Nos. 2 and 3 in the northern portion of Parcel 1 would be one story and approximately 24 to 27 feet in height above finished grade (to the roof parapet), with rooftop projections or towers up to approximately 35 feet in height above adjacent grade. Developed square footage on Parcel 1 would total approximately 129,926 gsf, with lot coverage of approximately 26.6 percent. To enhance the pedestrian environment and in response to community input, proposed open space and landscape amenities on the Parcel 1 would include a centrally located gathering common area that includes seating and landscaping, and a historically themed common area. The central east-west drive aisle within Parcel 1 and the joint Hotel A/Hotel B entry plaza would feature enhanced paving and landscaping. Parcel 1 would also be developed with bench seating and landscaped planters. Traffic islands within the surface parking lots and the planter strips lining internal drive aisles would be planted with trees, shrubs, and groundcover using a cohesive plant palette.

2. Parcel 2

Parcel 2 (3.38 gross acres/3.22 net acres), located on the southwest portion of the Project Site adjacent to Gale Avenue, would be developed with a full-service hotel (Hotel A). Hotel A is generally intended for business travelers and families, totaling 275 guestrooms and suites. Amenities would include a restaurant, bar, ballrooms/banquet facility, meeting rooms, business center, and fitness center, as well as a pool and lounge area. The hotel restaurant hours of operation would be from 6:00 A.M. to 10:00 P.M., while the bar would operate from 12:00 P.M. to 12:00 A.M. Banquet and meeting room hours of operation would extend to 12:00 A.M. Hotel A would be six stories and approximately 72 feet in height above finished grade (to top of parapet), with rooftop mechanical equipment up to 80 feet above grade. Developed square footage on Parcel 2 would total approximately 189,950 gsf, with lot coverage of approximately 36.62 percent.

3. Parcel 3

Parcel 3 (1.93 gross and net acres), located in the northwest portion of the Project Site, would be developed with an extended-stay hotel (Hotel B). Hotel B is generally intended for business travelers, totaling 202 guestrooms and suites. Rooms would incorporate fully equipped kitchenettes and common area amenities. These amenities would include a breakfast lounge, meeting rooms with hours of operation from 9:00 A.M. to 10:00 P.M., and a fitness center. The extended-stay hotel would be six stories high and approximately 72 feet in height above finished grade (to top of parapet), with rooftop mechanical equipment up to 80 feet above grade. Developed square footage on Parcel 3 would total approximately 130,930 gsf, with coverage of approximately 37.19 percent.

4. City of Industry Parcel

The 0.79-acre parcel in the City of Industry would accommodate surface parking stalls in excess of the County's Parking Code requirement for the Project, and a drive aisle to allow private and emergency response vehicle access between the Parcel 1 and Parcels 2 and 3. No buildings or other improvements are proposed for this parcel, apart from necessary storm drain, water, and wastewater infrastructure. Existing parcel boundaries would remain unchanged.

5. Infrastructure Improvements

The Project would include on-site utility improvements and connections to off-site municipal infrastructure. The partially channelized storm drain would be replaced with a 90-inch underground pipe connecting to the County storm drain system to the east and the City of Industry storm drain system to the west. The new underground storm drain would be constructed at the same elevation as the current storm drain channel, which is the lowest point on the Project Site, to maintain existing points of connection with off-site infrastructure. Fill placement in the northern Project Site would then raise the elevation of finished grade an average of five feet above the average grade, exclusive of the depressed storm drain channel.

A masonry retaining wall would be constructed along the northern property boundary and portions of the northeastern and northwestern property boundaries to retain fill soil and accommodate the finished grade elevation differential between the Project Site and adjacent off-site properties. The retaining wall along the northern property line would be approximately 680 feet in length and approximately 10.5 feet in height above existing grade on the adjacent UPRR/Metrolink right-of-way to the north. The retaining wall along the

northeastern property line would be approximately 157 feet in length and rise from two to 8.5 feet in height above existing grade on the Rowland Heights Plaza Shopping Center property to the east. The retaining wall along the northwestern property line would be approximately 184 feet in length and rise from two to 7.5 feet in height above existing grade on The Concourse Business Park property to the west. The walls would rise approximately one foot in height above finished grade on the Project Site and would be topped with perimeter security fencing.

Other infrastructure improvements would include on-site domestic and fire water systems (connecting to the Rowland Water District), wastewater infrastructure (connecting to the City of Industry municipal system, which is maintained by the County), and electricity, natural, gas, and telecommunications infrastructure. On-site storm drain infrastructure would be constructed in compliance with the County's Low Impact Development (LID) Standards.⁹

All ACE improvements on the Project Site related to the Nogales Street Grade Separation Project would be removed prior to the commencement of Project construction.

6. Access, Circulation, and Parking

As shown in Figure 2-4, vehicular access to the Project Site would be provided directly from Gale Avenue via an ingress/egress driveway on the proposed parcel boundary between Parcel 1 and Parcels 2 and 3—which would serve as the primary Project Site entrance—and a new ingress/egress driveway into Parcels 2 and 3 along the western Project Site boundary. The primary Project Site entrance would provide access to both hotels via a shared entry plaza and to Parcel 1 aligned with the hotel entry plaza. A three-way traffic signal would be installed at the driveway intersection with Gale Avenue (see PDF-TRAF-2 in Section 4.K, Transportation and Parking, of this Draft EIR). A new driveway would also provide access to Parcel 1 from the existing shared driveway with the Rowland Heights Plaza Shopping Center to the east.

Loading facilities for Parcel 1 would be located on the Project Site and at grade. Loading facilities would be provided to the west of Building No. 1, northwest of Building No. 2, north of Building No. 3, and southwest of Building No. 4. All loading facilities for Parcel 1 would be accessed from the surface parking lot or drive aisles surrounding the parcel. On Parcels 2 and 3, separate loading facilities would be provided on the western sides of each hotel and would be accessed from the drive aisle on the western edge of the Project Site.

The County's Parking Code requires 1,503 parking stalls for the Project, based on rates calculated for the disaggregated proposed uses.¹⁰ A parking permit is requested to allow fewer than the number of spaces required. The parking permit procedure is established to provide an alternative to the County's Parking Code requirements in the event that a particular use does not have the need for all of the required parking. Since peak parking demand for the commercial and hotel uses on the three proposed parcels would not be

⁹ *Los Angeles County Code, Title 12, Chapter 12.84, Low Impact Development Standards.*

¹⁰ *LACC requires 335 spaces for the proposed commercial retail uses (1/250 sf), 5 spaces for the proposed general office uses (1/400 sf), 520 spaces for the restaurant space [(40,113 nsf * 55%)/15]/3 and (40,113 nsf*45%)/200/3], 281 spaces for the two hotels (0.5*261 guestrooms/suites and 1.0*14 guestrooms/suites for Hotel A; 0.5*132 guestrooms/suites and 1.0*70 guestrooms/suites for Hotel B), and 266 spaces for Hotel A meeting rooms (12,000 sf/15/3), and 96 spaces for the Hotel A restaurant (3,600 sf/15/3), bar (600 sf/15/3), and kitchen (1,800 sf/200/3).*

coincidental, shared parking is proposed to accommodate the peak overlap. Within the Commercial Center square footage total, no less than 40,133 square feet and no more than 47,000 square feet of restaurant space accommodating up to 1,561 patrons is proposed to limit associated parking demand (see PDF-TRAF-3 in Section 4.K, Transportation and Parking, of this Draft EIR). The Project would provide a total of 1,161 parking spaces, which would meet and exceed the maximum forecasted shared demand of 1,143 spaces (i.e., on Saturday evening), as determined by the Shared Parking Study prepared for the Project (see Section 4.K, Transportation and Parking, and Appendix I-2, Parking Assessment, of this Draft EIR).

A total of 689 parking spaces would be provided on Parcel 1 for the Commercial Center, including 506 surface parking spaces and 183 spaces in single-level subterranean structures beneath Building Nos. 2, 3, and 4. A total of 260 parking spaces would be provided on Parcel 2 for Hotel A, including 137 surface parking spaces and 123 spaces within a single subterranean level. A total of 137 parking spaces would be provided on Parcel 3 for Hotel B, including 74 surface parking spaces and 63 spaces within a single subterranean level (see Figure 2-4 for proposed parking locations). An additional 75 surface parking spaces would be provided on the parcel in the City of Industry. These spaces would be counted toward fulfillment of the County's Parking Code requirement for the Project, with 55 spaces allocated to the Commercial Center on Parcel 1 and 20 allocated spaces to Hotel B on Parcel 3. All surface and subterranean parking spaces will be full size, with no compact spaces planned.

Subterranean parking beneath Building No. 4 would be accessed via a ramp on the building's eastern side directly from the shared driveway with the Rowland Heights Plaza Shopping Center. Parking beneath Building No. 3 would be accessed via a ramp on the building's southern side. Parking beneath Building No. 2 would be accessed via a ramp on the building's northern side. Parking beneath Hotel A on Parcel 2 would be accessed by a ramp near the building's southwestern corner, and parking beneath Hotel B on Parcel 3 would be accessed via a ramp just north of the building.

Pedestrian access to the Project Site, including an ADA-compliant ramp, would be provided from the Gale Avenue sidewalk adjacent to Building No. 4. Pedestrian access between Parcel 1 commercial uses and the hotels on Parcels 2 and 3 would be provided via pedestrian crossings between Hotel A and Building No. 1 and at the Hotel A/Hotel B shared entry plaza. Pedestrian access between Parcel 1 commercial uses and Rowland Heights Plaza Shopping Center to the east would be provided via crosswalks at the vehicular entrance to Parcel 1, which aligns with the entrance to the shopping center.

7. Lighting and Signage

Project signage would include building identification and way-finding signage. Pedestrian areas, including plazas and walkways, would be well lighted for security. Accent lighting is proposed to complement building architecture, outdoor hotel communal spaces, general outdoor seating, and landscaping. A monument sign identifying the hotels and a pylon sign for the commercial uses would mark the primary entrance driveway on Gale Avenue. Within the Project Site surface parking areas, pole-mounted light fixtures would be shielded and directed towards the areas to be lighted and away from adjacent sensitive uses. All signage would be intended to serve the on-site Project uses and activity; no off-site signage is proposed.

8. Sustainability Features

The Project would be designed to comply with the County's Green Building Program, which is based on the 2010 California Green Building Standards Code (CALGreen) and addresses Green Buildings, Drought Tolerant Landscaping, and LID requirements, which govern the treatment of stormwater runoff. The Project would meet the standards for Leadership in Energy and Environmental Design (LEED®) Silver certification by the U.S Green Building Council, or the equivalent as determined by the County Department of Public Works, through the implementation of green building techniques and energy conservation features. Some key Project features intended to contribute to energy efficiency include: 1) use of heating, ventilation, and air conditioning (HVAC) systems that use ozone-friendly refrigerants; 2) materials and finishes that emit minimal quantities of volatile organic compounds (VOCs); 3) high-efficiency fixtures and appliances; 4) use of drought-tolerant and water-efficient landscaping; water conservation measures including installation of low-flow fixtures and smart irrigation controls; and 5) stormwater retention and treatment on site. The Project is also intended to support and enhance pedestrian mobility between the Project Site and the commercial uses to the south, east, and west along Gale Avenue.

G. ANTICIPATED CONSTRUCTION SCHEDULE

The Project is proposed for construction in two major phases corresponding to build out of Parcel 1, the Commercial Center, and the full-service Hotel A (Phase 1) and associated subterranean parking, followed by subsequent build out of Parcel 3, the extended-stay Hotel B and associated subterranean parking (Phase 2). The site (footprint) of Hotel B would be developed during Phase 1 for temporary surface parking, as desired or demonstrated by need, until Phase 2 construction commences. The construction of surface parking and utility infrastructure improvements on the parcel located in the City of Industry, including undergrounding of the existing surface storm drain channel, would also be undertaken as part of Phase 1. Construction staging and construction worker parking would be accommodated on the Project Site during both phases of construction.

All ACE improvements on the Project Site related to the Nogales Street Grade Separation Project—including New Charlie Detour Road, associated railroad crossing and dual box culvert/bridge crossing, construction access road, two-acre storage area for excavation spoils, and surface parking on the eastern side of the Project Site—would be removed by ACE prior to the commencement of Project construction.

Construction of Phase 1 of the Project is anticipated to begin in mid-2017, pending Project consideration and approval by the County and following completion of the Nogales Street Grade Separation Project. Phase 1 of the Project would take approximately 24 months, with completion in 2019. Construction of Phase 2 would take approximately 18 months and would be completed no earlier than early 2020. Construction of the two phases may overlap (i.e., staggered construction start dates) or be consecutive, depending on market conditions, but would not commence simultaneously.

Approximately 192,000 cubic yards (cy) of soil would be graded and excavated during Project construction in the course of constructing subterranean parking for the commercial buildings and hotels, building pads and footings, hardscape, retaining walls, utility trenching, and undergrounding of the existing partially channelized drainage. The majority of the excavated soils, approximately 130,500 cy, would be reused as fill on site, predominantly to raise the finished grade on the northern end of the property.

After accounting for subsidence- and shrinkage-related reductions in cut materials totaling approximately 13,200 cy, the remaining excavated soils, an estimated 48,300 cy, would require export and disposal. Of this, approximately 11,800 cy would require export during Phase 1 and 36,500 cy would require export during Phase 2, when the subterranean parking, building pad, and grounds for Hotel B on Parcel 3 are constructed. The proposed haul route for exported soil would follow Gale Avenue between the Project Site and SR-60 east- or west-bound offramps; Gale Avenue is more than 300 feet from the nearest residential receptors, which are located south of SR-60. At this time, the likely disposal site for exported soil is unknown, as it could be sold by the hauler as clean fill for other development sites or disposed of at a landfill.

H. NECESSARY APPROVALS

Discretionary and administrative land use approvals required for the Project are anticipated to include, but may not be limited to, the following:

- Certification of the Project EIR
- Zone Change (from M-1.5 to a C-3-(DP) zoning designation for Parcels 2 and 3 for hotel use)
- Vesting Tentative Parcel Map (to subdivide the unincorporated portion of the Project Site into three parcels, including 155 commercial condominiums units within Parcel 1)
- Conditional Use Permit
 - Development Program (DP) CUP (in conjunction with the proposed Zone Change for the Parcels 2 and 3 for hotel uses) and to allow structures to exceed the maximum height of 45 feet above grade (Los Angeles County Code [LACC] 22.40.040 and 22.44.132.D.4.b)
 - To authorize a commercial shopping center containing more than three business establishments (Rowland Heights Community Plan, Land Use Policy 8.g; LACC 22.56.010 and 22.56.040)
 - Sale (for on-site-consumption) of alcoholic beverages, in conjunction with the operation of the hotels (LACC 22.28.210.A and 22.56.195)
 - On-site grading of more than 100,000 cubic yards of soil (LACC 22.32.130.A)
- Parking Permit (for shared parking reduced on-site parking, and valet parking) (LACC 22.56.990)
- Demolition, grading, excavation, foundation, and building permits
- Drainage Concept Review by the County Department of Public Works, Land Development Division and Flood Maintenance Division
- U.S. Army Corps of Engineers 404 Permit, California Department of Fish & Wildlife Section 1603 Permit (Streambed Alteration Agreement), and Regional Water Quality Control Board 401 Permit for undergrounding of on-site storm drain channel
- Other permits and approvals as deemed necessary

3. GENERAL DESCRIPTION OF ENVIRONMENTAL SETTING

3.0 GENERAL DESCRIPTION OF ENVIRONMENTAL SETTING

Section 15125 of the State *CEQA Guidelines* requires that an EIR include a description of the existing environment. This chapter provides a general overview of the environmental setting for the Project. Detailed information on existing conditions is provided for each environmental topic studied in Chapter 4, Environmental Impact Analysis. This chapter also provides an overview of related projects that are considered as part of the future conditions in evaluating cumulative impacts.

A. OVERVIEW OF ENVIRONMENTAL SETTING

1. On-Site Conditions

The Project Site is located at 18800 Gale Avenue in the unincorporated Los Angeles County (County) community of Rowland Heights (14.06 acres) and on a contiguous 0.79-acre property to the north located in the City of Industry. The Project Site was previously used for agricultural cultivation and is currently undeveloped except for temporary road access, construction staging, and parking improvements described below. A partially channelized storm drain extends from near the Project Site's northeast corner to the northwest corner. The storm drain currently supports willows and other riparian and upland vegetation. Other vegetation on the Site includes non-native grasses and brush and scattered trees. The Project Site gently slopes downward towards the northwest. A temporary detour road between Railroad Street and Gale Avenue, a related construction access road and construction staging area, and temporary surface parking have been established on the Project Site by the Alameda Corridor-East Construction Authority (ACE) for use during construction of the nearby Nogales Street Grade Separation Project. Portions of the eastern edge of the Project Site have also been paved and striped to provide temporary parking for the Rowland Heights Plaza Shopping Center, replacing stalls displaced by construction of the Nogales Street Grade Separation Project. Local access to the Project Site is provided by Gale Avenue.

2. Surrounding Uses

The Project Site is located within the northern portion of the community of Rowland Heights. Rowland Heights is a predominantly low-density residential community, with two small clusters of light industry and commercial development along the Pomona Freeway (SR-60) between the Nogales Street and Fairway Drive interchanges; the majority of its commercial development is concentrated along Colima Road south of SR-60. The southern portion of Rowland Heights includes large areas of undeveloped open space within the Puente Hills.

The Project Site is located within the concentration of light industrial and commercial uses centered on Nogales Street near its interchange with SR-60. This concentration is part of an approximately 14-mile-long corridor of predominantly industrial land uses, most of it contained within the City of Industry, that encompasses a half-mile-wide swath between SR-60 on the south and Valley Boulevard on the north, extending from the Orange Freeway (SR-57) on the east to the San Gabriel River Freeway (I-605) on the west. The jurisdictional border between the unincorporated County and the City of Industry wraps around the Project Site to the north and west. The majority of the Project Site (14.06 acres) is located in the northernmost portion of Rowland Heights. The northern portion of the Project Site (0.79 acres), a 50-foot-wide strip representing a vacated segment of Railroad Street, is located entirely within the City of Industry. The County/City boundary is also contiguous with the Project Site's western boundary.

The Project Site fronts Gale Avenue on the south. A Best Western Plus Executive Inn hotel is located directly across Gale Avenue and Mandarin Plaza Shopping Center is located to the southeast. On the east, the Project Site is bordered by the Rowland Heights Plaza Shopping Center, which includes a 99 Ranch Market, retail stores, restaurants, and surface parking. The shopping center's western driveway, accessed from Gale Avenue, abuts the Project Site's eastern boundary. This driveway provides access to the loading dock and parking to the rear (north) of the 99 Ranch Market. On the north, the Project Site terminates at the southern limit of the UPRR/Metrolink right-of-way. Railroad Street and Nogales Industrial Parks are located north of the tracks. Properties north of the Project Site are located in the City of Industry. On the west in the City of Industry, the Project Site is bordered by The Concourse Business Park, which houses offices and wholesale commercial and light industrial operations. West of The Concourse Business Park, Gale Avenue is lined with the Four Seasons shopping center and additional wholesale commercial and manufacturing, storage, and distribution businesses.

The nearest residential uses are located across SR-60 to the south approximately 300 feet from the Project Site. These uses include the Rowland Heights Mobile Estates mobile home park and predominantly single-family residences, all accessed from Colima Road.

3. Existing Conditions

Gale Avenue, a two- to four-lane roadway, provides local access to the Project Site. Gale Avenue intersects Fullerton Road to the west and Nogales Street to the east. Both roadways provide interchanges with SR-60. The Nogales Street interchange is located approximately one-half mile southeast of the Project Site. The SR-57 is approximately four miles to the east, and I-605 is approximately 8.5 miles to the west.

The Nogales Street Grade Separation Project is currently under construction approximately one-half mile east of the Project Site at the intersection of Railroad Street and Nogales Street. As part of the Nogales Street Grade Separation Project, Gale Avenue is being widened between 16 and 18 feet (i.e., eight to nine feet on each side) to create a four-lane road for a distance of 0.36 miles west of its intersection with Nogales Street, including the Project Site frontage. Gale Avenue's eastbound approach to Nogales Street will be reconfigured to accommodate two exclusive left-turn lanes, one through-lane, and one exclusive right-turn lane. Construction of the Nogales Street Grade Separation Project is expected to be completed within three years (i.e., 2016) and prior to the start of Project construction.

As described in Section 4.K, Transportation and Parking, and shown on Figure 4.K-1, 18 study intersections were identified in the Project area. Based on 2013 Traffic conditions and prior to the commencement of the Nogales Street Grade Separation Project, these intersections operate within acceptable levels of service during peak traffic hours (see Table 4.K-1).

For more detailed descriptions of existing conditions specific to each of the environmental issues analyzed in this Draft EIR, see Chapter 4.0, Sections 4.A through 4.L.

B. RELATED PROJECTS

CEQA requires that EIRs analyze cumulative impacts. As defined in the State *CEQA Guidelines* Section 15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. State *CEQA Guidelines* Section 15130(a) states that an EIR must discuss cumulative impacts of a project when the project's incremental

effect is cumulatively considerable, as defined in Section 15065(a)(3). Where a lead agency is examining a project with an incremental effect that is not “cumulatively considerable,” a lead agency need not consider that effect significant, but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. However, an EIR should not discuss impacts which do not result in part from the project evaluated in the EIR. Furthermore, when the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if a project is required to implement or fund its fair share of a mitigation measures designed to alleviate the cumulative impact. A lead agency must identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant.

In addition, State *CEQA Guidelines* Section 15130(b) indicates that the analysis of cumulative impacts shall reflect the severity of the impacts and the likelihood of occurrence, but the discussion need not provide as great of detail as provided for the effects attributable to the project alone. Instead, the discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of the other projects which do not contribute to the cumulative impact.

A project has “cumulatively considerable” or significant cumulative impacts when its incremental effects “are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”

For an adequate discussion of significant cumulative impacts, the State *CEQA Guidelines* (Section 15130(b)(1)(A) and (B)) allow an EIR to determine cumulative impacts and reasonably foreseeable growth based on either of the following methods:

- A list of past, present, and probable future projects producing related or cumulative impacts; or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

For the purposes of the cumulative impacts analysis for the Project, the County has opted to use the list approach for evaluating cumulative effects. Based on information provided by the County of Los Angeles Department of Regional Planning Department, a list of past, present, and probable future projects is provided in **Table 3-1, Related Projects List**, with the locations of each of the related projects shown on **Figure 3-1, Related Projects Map**. Although the projects listed in Table 3-1 serve as the primary bases for evaluation of cumulative impacts, the approach to these analyses vary for certain environmental issues. The cumulative analyses for each environmental issue are provided in their applicable sections in Chapter 4.0, Environmental Impact Analysis, of this Draft EIR.

Table 3-1

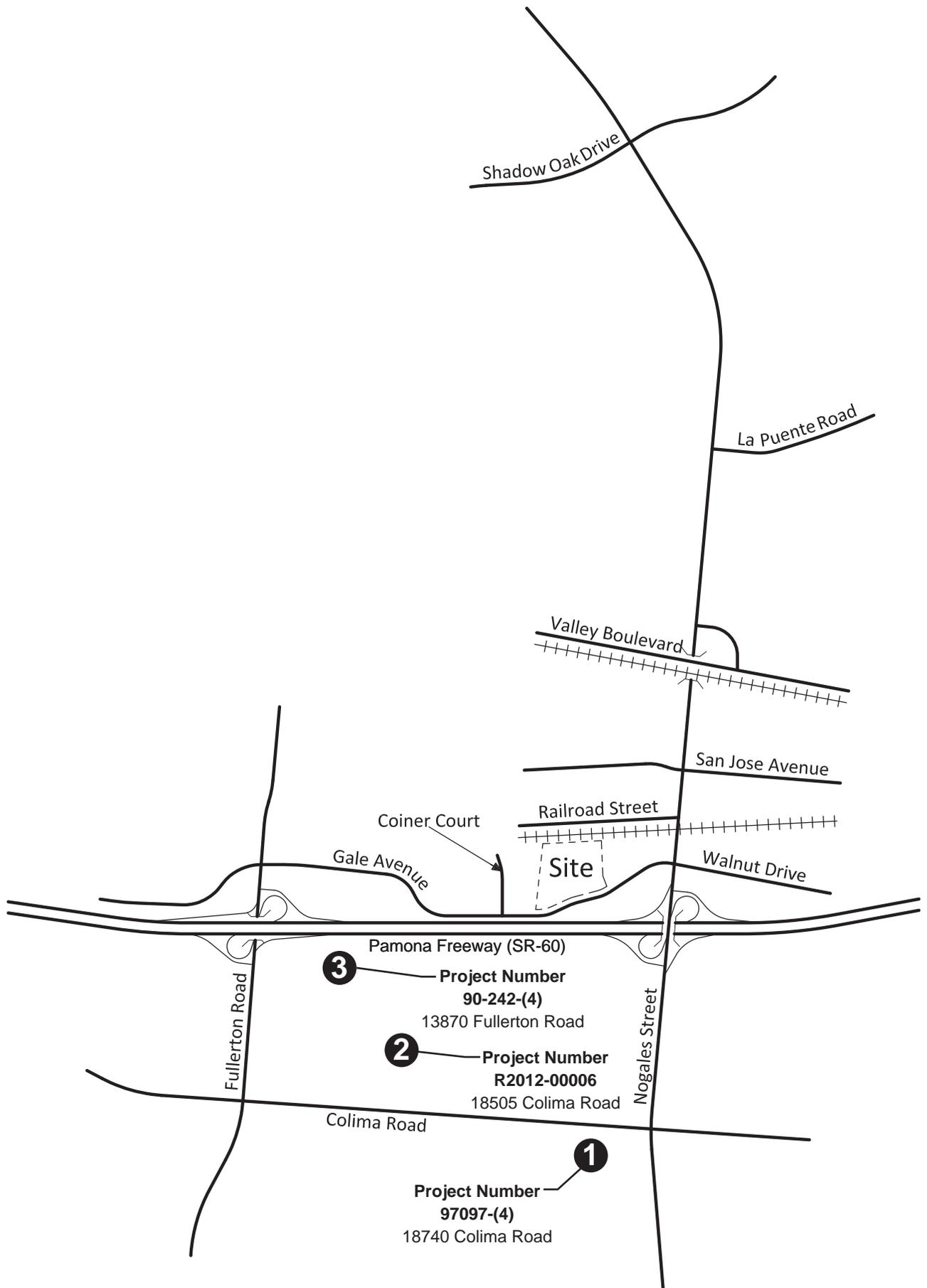
Related Projects List

MAP NUMBER	PROJECT NUMBER	ADDRESS	DESCRIPTION/LAND USE	SIZE
1.	97097-(4)	18740 Colima Road	Restaurant Addition	828 sf
2.	R2012-00006	18505 Colima Road	Specialty Retail Medical/Dental Office Restaurant	3,481 sf 2,216 sf 2,306 sf
3.	90-242-(4)	1380 Fullerton Road	Retail Restaurant	-1,319 sf 1,319 sf

sf – square feet

Note: The Nogales Street Grade Separation Project, described in Chapter 2.0, Project Description, would be completed prior to construction of the Project and the completion of this interchange was considered in the traffic analysis presented in Section 4.K, Transportation and Parking of this Draft EIR. Therefore, the Nogales Street Grade Separation Project is not included in this list of related projects.

Source: County of Los Angeles Department of Regional Planning (<http://planning.lacounty.gov/case>) and Kunzman Associates, Inc., 2015.



N

 Not to scale

Related Projects Map

Rowland Heights Plaza and Hotel Project
 Source: Kunzman Associates, Inc., 2015.

FIGURE
3-1

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4. ENVIRONMENTAL IMPACT ANALYSIS

4.A AESTHETICS

1. INTRODUCTION

This section evaluates the potential aesthetic and visual resource impacts that could result from the Project with regard to visual character, artificial light and glare, and shade/shadow.

a. Visual Character

“Visual character” refers to the appearance of an area or site and its relationship to the surrounding built or natural environment. An area’s visual character is based on the physical appearance and characteristics of the environment, such as the proximity and balance of man-made structures with open space or landscaping, or built landmarks, such as bridges or buildings. As an overview, the analysis of visual character begins with the identification of the visual resources in relation to the surrounding environment, as well as the visual access to these resources. Certain visual resources are generally perceived to possess valuable attributes. Land uses, as well as natural features, are urban features of the landscape and, of these features, some may also be considered to be visual resources.

The analysis of visual character considers such characteristics as building siting, setbacks and articulation, mass, height, architectural finishes, and landscape and hardscape treatments, and assesses the degree of compatibility or contrast with other features on the Project Site and land uses in the Project area. Visual character functions as a point of reference in assessing whether the Project’s features would appear to be compatible with the established surrounding environment. Adverse visual quality impacts considered within the analysis include the loss of existing valued aesthetic features and the introduction of contrasting features that contribute to a decline in the overall visual character (e.g., the introduction of contrasting features that overpower familiar features, eliminate context or associations with history, or create visual incompatibility where there may have been apparent efforts to maintain or promote a thematic or consistent character). In general, the evaluation of visual character is determined by the degree of contrast that could potentially result between a project and its setting, including the existing natural and built environments.

b. Views

The analysis of view impacts applies to the effects of a project on views of scenic vistas or valued publicly available views of aesthetic resources. Views may be focused, as of a single feature such as a building or landscape feature, or panoramic, encompassing a broad field of view such as a city skyline or mountains. Vantage points offering views may be a single location or a linear vantage, such as a roadway or trail. The degree of degradation or obstruction of views of valued resources is the basis for the determination of potential view impacts.

c. Artificial Light and Glare

Artificial light impacts are typically associated with ambient light levels during the evening and nighttime hours. Sources may be stationary, such as streetlights and illuminated signage, or mobile, such as vehicle headlights. Certain land uses such as residences and hotels are considered light sensitive since typically they are occupied by persons who have an expectation of privacy during evening hours and are subject to

disturbance by bright light sources. The analysis of lighting impacts focuses on whether the Project would cause or substantially increase lighting effects on light-sensitive uses.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and to a lesser degree, from broad expanses of light-colored surfaces. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use. The analysis of glare focuses on whether glare effects would interfere with glare-sensitive activities.

d. Shade/Shadow

The shade/shadow analysis applies to shading that would occur as a result of new buildings and structures. The analysis assesses the height and massing of the Project and the potential of the Project to cast shadows on shade-sensitive uses such as residences, schools, or parks. However, shading can have an adverse impact if it substantially interferes with the enjoyment or performance of outdoor activities. While some incidental shading on shadow-sensitive uses is commonly acceptable, shading that occurs over extended periods of time can be considered a detriment. Although shading is common and expected in urban areas, and is considered a beneficial feature when it provides cover from excess sunlight and heat, it can have an adverse impact if it interferes with sun-related activities and sensitive uses.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Visual Character

(a) Project Site

The Project Site has a moderate slope, which varies in topography from 458 feet above mean sea level (AMSL) at the east edge of the Project Site to 447 feet AMSL at the west edge of the Project Site, and from 456 feet AMSL at the south edge to 435 feet AMSL at the north edge. The highest point on the property (466 feet AMSL) occurs in the approximate center of the site. The variety of elevations creates a slight knoll in the center of the Site, with the lowest area along the north perimeter. The primary visual characteristics of the Project Site are its currently vacant condition and temporary three-lane “New Charlie” detour road associated with the Nogales Street Grade Separation Project.

The Project Site is bordered on the south by Gale Avenue. At the southwest corner of the Project Site, Gale Avenue abuts the Pomona Freeway (SR-60) right-of-way. Gale Avenue and SR-60 are located within unincorporated Los Angeles County. The Project Site is bordered on the north by the Union Pacific Railroad (UPRR) and Railroad Street (north of the railroad), which are located within the City of Industry. On-site features also associated with the Nogales Street Grade Separation Project include the approach to the temporary at-grade railroad crossing to the north, a dual box culvert/bridge crossing, a construction access road, a two-acre storage area for excavation spoils, and surface parking on the eastern side of the Project Site. The New Charlie detour road is lined with several street light poles.

A partially channelized storm drain extends from near the Project Site’s northeast corner to its northwest corner, where it discharges into the City of Industry’s underground storm drain. The storm drain currently supports willows and other riparian and upland vegetation, although it is periodically cleared as required by

the County of Los Angeles and the City of Industry Public Works Departments to maintain storm flow capacity. Other vegetation on the Project Site includes non-native grasses and brush that have colonized the former agricultural fields, and scattered trees, including palms, near the eastern edge of the property.

Portions of the eastern edge of the Project Site have been paved and striped to provide temporary parking for the Rowland Heights Plaza. These spaces replace parking needed for construction of the Nogales Street Grade Separation Project. The Project Site has an open space character because it lacks buildings. Views of the San Gabriel Mountains and foothills are available from Gale Avenue across the west portion of the Project Site. However, because of the natural rise in the topography in the east portion, the Site does not afford distant or mountain views from Gale Avenue.

Photographs of existing conditions on the Project Site and in the Project vicinity are shown in **Figures 4.A-1** through **4.A-5**, *Site Photographs*.

(b) Project Vicinity

Surrounding properties north of the SR-60 are urban in character and developed with industrial and commercial uses adjoining all sides of the Project Site. The concentration of commercial and industrial uses centered on Nogales Street near its interchange with SR-60 is part of an approximately 14-mile-long corridor of predominantly industrial land uses, most of it within the City of Industry and extending a half-mile-wide between SR-60 on the south and Valley Boulevard on the north. This corridor extends from the Orange Freeway (SR-57) on the east to the San Gabriel River Freeway (I-605) on the west. In the vicinity of the Project Site, SR-60 is at the same grade as adjacent commercial/industrial uses to the north and commercial and residential uses to the south. As shown in Figure 2-2, *Aerial Photograph of Project Site and Surrounding Land Uses*, in Chapter 2.0, Project Description, of this Draft EIR, the jurisdictional border between the unincorporated County and the City of Industry wraps around the Project Site to the north and west. In this area, the City of Industry is almost completely built out with industrial and commercial uses.

The visual character of the surrounding area is mixed, depending upon where a viewer is located. Existing low-rise industrial buildings are generally featureless and gray or white in appearance and flat-roofed, with some street and parking lot landscaping. Commercial uses along Gale Avenue and Nogales Street provide landscaping, more color features to the setting, and vivid “logo” signage, some of which is oriented to the SR-60 interchange and visible from Gale Avenue.

Land uses immediately surrounding the Project Site include a three-story Best Western hotel directly across Gale Avenue. The Mandarin Plaza Shopping center adjoins the Best Western site to the southeast. The Mandarin Plaza contains a variety of commercial uses, including retail, restaurants, a health clinic, and other businesses. The parking lot is located within the Mandarin Plaza and does not front onto Gale Avenue. To the east, the Project Site is bordered by the Rowland Heights Plaza, which includes a 99 Ranch Market, retail stores and restaurants, and surface parking. The Rowland Heights Plaza’s western driveway, accessed from Gale Avenue, abuts the Project Site’s eastern boundary and provides access to the loading dock and parking to the rear (north) of the 99 Ranch Market. The Gale Avenue frontage along the Rowland Heights Plaza, Mandarin Plaza, and Best Western hotel features a landscaped parkway, including lawn and street trees. In addition to lawn and trees, the parkway along the Rowland Heights Plaza partially conceals views of street-

facing parking from Gale Avenue. Other features that add to the visual character of the commercial development around the Project Site are the red gable roof at the Best Western hotel, green awnings at the Rowland Heights Plaza, and mixed stone and concrete exterior walls and street-oriented windows at the Mandarin Plaza. Finished masonry walls generally conceal the Mandarin Plaza's receiving dock on Gale Avenue. The commercial uses along Gale Avenue lack sidewalks and formal pedestrian circulation routes. Pedestrian access from the Best Western hotel to the Mandarin Plaza would be through the surface parking lot for the latter commercial use. No sidewalks exist along the Rowland Heights Plaza's Gale Avenue frontage.

Land uses within the Gale Avenue and Nogales Street intersection include vacant lots at the northeast and northwest corners. An approximately 20-foot-high billboard for the Diamond Family Spa is located in the northeast lot, and a power substation is located immediately to the north. Approximately 45-foot-high poles for high power transmission lines travel west and north from the substation along Nogales Street. Multistrand power lines also cross Nogales Street and travel west along Railroad Street. Utility lines are not visible along Gale Avenue or within the adjacent commercial uses. The high power transmission lines contribute to an industrial visual environment along Nogales Street. East of the intersection, Gale Avenue is lined with street trees and light industrial uses such as warehouses and storage units. The vacant lot at the northwest corner of Gale Avenue and Nogales Street is currently used to store fill materials for the Nogales Street Grade Separation Project.

An Arco mini mall and Burger King are located at the southeast and southwest corners of the Gale Avenue and Nogales Street intersection, respectively. Both sites feature approximately 20-foot-high freestanding signs. To the south on Nogales Street, the street enters the Nogales Street/SR-60 interchange, at which point Nogales Street crosses over SR-60. A gradient rise was created for the Nogales Street overcrossing, and an approximately 45-foot-high Arco sign (feet above the raised grade) is located adjacent to the freeway's westbound off-ramp. Because of the raised gradient, long views to the north and south are available from the freeway interchange.

Commercial uses, such as an El Pollo Loco restaurant, a Motel 6, and a Denny's restaurant are located south of the freeway along the Nogales Street/SR-60 interchange. To the west of these uses are a sports field (golf), a two-story residential condominium building, and the Rowland Heights Mobile Estates mobile home park. The mobile home park is located directly south of the Project Site, on the opposite side of SR-60, and comprises single-story dwelling units. A single-family residential neighborhood is located west of the mobile home park, on the opposite side of the Pomona Freeway to the southwest of the Project Site. Because the gradient of the Pomona Freeway is similar to that of the surrounding area, masonry sound walls and landscaping along the north edge of the mobile home park and single-family residential neighborhood substantially block views across the freeway from the streets within these residential neighborhoods. However, taller structures and signs north of SR-60 are visible from residential neighborhood streets.

The Concourse Business Park and surface parking area adjoin the west edge of the Project Site (along its southerly portion), and an industrial park adjoins the east side of Project Site along its northerly portion. The portion of the business park fronting Gale Avenue contains retail, wholesale, and corporate offices uses. The street edge along the business park features a landscaped parkway and contains surface parking for the respective businesses. In this area, the business park directly fronts SR-60 across Gale Avenue. To the west



Photograph 1: 99 Ranch Market Shopping Center, east of Project Site on Gale Avenue



Photograph 2: The Concourse Business Park, west of Project Site on Gale Avenue



Photograph 3: Best Western Plus Executive Inn, south of Project Site on Gale Avenue



Photograph 4: Mandarin Plaza Shopping Center, southeast of Project Site on Gale Avenue



Photograph 1: Charlie Road detour through Project Site at Gale Avenue; Pomona Freeway(SR-60) in background.



Photograph 2: Looking south along New Charlie Road detour at signalized intersection at Gale Avenue



Photograph 3: ACE Nogales Street Grade Separation Project construction laydown yard, southwest corner of Project Site



Photograph 4: ACE Nogales Street Grade Separation Project construction laydown yard, southwest corner of Project Site



Photograph 1: Southeast corner of Project Site, at Gale Avenue entrance to shared driveway with Ranch 99 Market Shopping Center



Photograph 2: East edge of Project Site along shared driveway 99 Ranch Market Shopping Center (looking south toward Gale Avenue)



Photograph 3: North end of shared driveway 99 Ranch Market Shopping Center



Photograph 4: Temporary parking for 99 Ranch Market Shopping Center in northeast corner of Project Site (storm drain in foreground)



Photograph 1: Looking north at Charlie Road detour railroad crossing and storm drain culvert at Railroad Avenue, north end of Project Site



Photograph 2: Northwest Project Site



Photograph 3: Northeast Project Site



Photograph 4: Looking west across central Project Site and Charlie Road detour toward The Councourse Business Park



Photograph 1: Looking southeast into Project Site at new Charlie Road detour railroad crossing at north end of Project Site



Photograph 2: Looking southwest into Project Site at Charlie Road detour railroad crossing at north end of Project Site



Photograph 3: Looking north from Project Site toward Union Pacific Railroad-Metrolink tracks and Nogales Industrial Park on Railroad Street



Photograph 4: Looking west along partially channelized storm drain, north end of Project Site

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of the business park, Gale Avenue bends away from the freeway, and a shopping mall with one- to three-story buildings and surface parking is located between the SR-60 and Gale Avenue.

The industrial park that adjoins the Project Site to the north of the business park contains several large warehouses with walls extending 990 feet in length. These buildings form a solid, approximately 20-foot-high blank wall along Railroad Street to the north.

The southern limit of the UPRR/Metrolink right-of-way borders the Project Site to the north. Railroad Street is located to the north of the tracks, and industrial uses within the City of Industry are located to the north of Railroad Street. These uses are heavy industrial in character and are served by railroad spur lines.

A segment of the Schabarum Skyline Trail, which follows Arenth Avenue and the San Jose Creek flood control channel along Arenth Avenue, is located approximately 1,200 feet north of the Project Site. The trail turns south on Lawton Avenue approximately one mile west of the Project Site and ultimately enters Schabarum Regional Park more than two miles to the southwest. Because of generally flat topography along the San Jose Creek flood control channel and intervening industrial buildings between Arenth Avenue and Railroad Street, no scenic vistas or other views toward or across the Project Site are available from the trail. Arenth Avenue and the flood control channel are not landscaped. Broad views of the area are available from Schabarum Regional Park, located more than two miles to the southwest of the Project, south of SR-60. However, because of hills (a rise in elevation) between public areas in the park and Project Site, views of the Project Site are not available.

The visual character of SR-60 is softened by landscaping along portions of the right-of-way and within the interchange areas. Because the freeway is located at a similar grade to the adjacent street system, several signs and billboards are visible from the freeway. These include the approximately 45-foot-high tower sign for the Best Western hotel, which is incorporated into the hotel, and a free-standing double pole sign for the Best Western hotel adjacent to the freeway right-of-way. Other billboards and signs along the freeway frontage include an approximately 45-foot-high billboard for the 99 Ranch Market and a free-standing pylon sign for the Coconut Bay and Leung Kee restaurants at the north edge of the freeway right-of-way, east of the Best Western hotel. Most views across the Project Site from the freeway are substantially blocked by landscaping or the Best Western hotel. Mountain views that contribute to the visual character of the area are available from the SR-60/Nogales Street interchange and through the north-facing Nogales Street corridor.

(2) Light and Glare

Daytime glare in the area is generally the result of reflected light from vehicles on SR-60 and Gale Avenue and from vehicles within surface parking lots. Nighttime lighting is generated by vehicle traffic on SR-60, illuminated signage associated with taller pole signs near the Nogales Street/SR-60 intersection, and illumination from light poles along SR-60 and Gale Avenue and surface parking lots. Light poles are also located within the temporary detour road crossing the Project Site. Illuminated commercial signage associated with the adjacent Mandarin Plaza, Rowland Heights Shopping Center, and Best Western hotel, and in commercial areas along Gale Avenue to the east and west of the Project Site, also contribute to ambient nighttime light. Because the freeway is generally the same grade as Gale Avenue and surrounding land uses, headlights from the vehicles on the freeway are a major source of light along Gale Avenue.

(3) Shade/Shadow

The existing Project Site contains no buildings.

b. Regulatory Framework Summary

(1) State

(a) California Scenic Highway Program

The purpose of the California Scenic Highway Program California is to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to highways. The California Department of Transportation (Caltrans) defines a State Scenic Highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. Highways can be determined as “eligible” or “official designated,” depending on the adoption by the local jurisdiction of scenic protection ordinances. These include land use and density regulations, site planning, control of outdoor advertising, attention or control of mass grading, attention to design and appearance of structures along the highway. A highway may be designated eligible, depending upon views of the natural landscape from the freeway, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view.

Streets surrounding the Project Site—including Railroad Street, Coiner Court, and Nogales Street and the adjacent Pomona Freeway—are not named by Caltrans as “eligible” or “official designated” scenic highways, nor are these streets and highways designated as “scenic” in any local or regional plans. Therefore, the California Scenic Highway Project would not be applicable to the Project and therefore is not discussed in this EIR section.

(2) County

(a) County of Los Angeles General Plan

A purpose of the Los Angeles County General Plan is to protect the shared needs of the residents of Los Angeles County and the interests of future generations. The shared needs of Los Angeles County residents include a healthful, safe, attractive, and prosperous environment.¹ The General Plan provides a framework for coordinating short and medium-range actions to meet needs and to prevent future problems. It sets forth guidelines for allocation of resources.² Chapters relevant to aesthetic resources are Conservation and Open Space Element, the Scenic Highway Element, and Implementation Chapter. The Conservation and Open Space Element of the General Plan includes policies intended to protect open space-related resources, including scenic resources. The Conservation and Open Space Element identifies scenic resources as a varied landscape, including natural environments, such as mountains and ocean; development, such as historical architectural styles and skyscrapers; and scenic drives, such as Mulholland in the Santa Monica Mountains. The Conservation and Open Space Policy Map depicts existing and recommended open space of regional significance. Policies and programs of the Conservation and Open Space Element are directed toward the

¹ *Los Angeles County Department of Regional Planning, County of Los Angeles General Plan, Introduction Chapter, adopted November 25, 1980, page 1.*

² *Ibid.*

management of natural resources and protection of those areas that constitute the Open Space Plan.³ The Scenic Highway Element defined scenic drives as a highway or a local road that affords visual enjoyment of nature either undisturbed or enhanced by incidental or designed efforts of man. Proposed corridor studies in the Scenic Highway Element apply to roadside rests and vista points as integral of the scenic drive to permit sight-seers to park and enjoy the scenery from the side of the road. Approximately 700 miles of roads are designated as scenic drives, of which 260 miles are within Los Angeles National Forest.⁴ SR-60 is not identified in the General Plan as a County of Los Angeles scenic drive. Chapter 8 of the General Plan (Implementation Chapter) sets forth implementation strategies that are structured to achieve the goals of the General Plan.⁵ As discussed therein, new development strategies include the infilling of vacant urban lands.⁶ The Implementation Chapter states that, over the life of the General Plan, increasing emphasis should be placed on infill and revitalization.⁷ The Implementation Chapter also discusses an environmental protection and resource conservation strategy to “save or conserve resources, with emphasis on unique and irreplaceable resources.”⁸ The implementation strategies of the County of Los Angeles County General Plan that are applicable to the Project are presented in Subsection 3.d, Project Impacts, below.

(b) County of Los Angeles Code

Title 26, Chapter 65 (Sign Regulations) of the Los Angeles County Code (LACC) establishes development standards for signs within unincorporated communities of Los Angeles County. The LACC sign regulations, apply to all types of commercial signs, including ground signs, projecting signs, roof signs, and wall signs. The LACC defines wall signs as a sign attached to or erected against a wall of a building, with the plane of the sign parallel to the plane of the building. Projecting signs are defined as signs suspended from or supported by a building (but not a wall sign). Roof signs are defined as a sign erected upon or above a roof or parapet wall of a building. Ground signs are defined as signs detached from the building and supported by the ground. Under LACC Section 6502.2, a building permit is required for every sign and sign structure regulated under the LACC. Under Section 6502.7, no sign shall be erected that would interfere with, mislead or confuse traffic. Section 6502.10 requires that signs and sign structures be maintained at all times in a state of good repair and be able to withstand wind pressure.

Title 31 (Green Building Standards) establish County regulations pertinent to landscape design, and more specifically, Section 4.106.5. The LACC section for post-construction landscape design requires that a project shall not provide more than 25 percent turf within the total landscaped area; non-invasive drought-tolerant plant and tree species appropriate for the climate zone shall be utilized in at least 75 percent of the total landscaped area; and hydrozoning irrigation techniques shall be incorporated into the landscape design. Title 31 also requires energy efficiency, which applies to the design of interior and exterior lighting fixtures.

³ *Los Angeles County Department of Regional Planning, County of Los Angeles General Plan, Conservation and Open Space Element and Conservation and Open Space Policy Map, adopted November 25, 1980.*

⁴ *Los Angeles County Department of Regional Planning, County of Los Angeles General Plan, Scenic Highway Element, adopted October 11, 1974.*

⁵ *Los Angeles County Department of Regional Planning, County of Los Angeles General Plan, Chapter 8, Implementation, adopted November 25, 1980, page VIII-10.*

⁶ *Ibid, page VIII-11.*

⁷ *Ibid.*

⁸ *Ibid, page VIII-13.*

Title 12 (Environmental Protection Pertinent to Lighting) establishes certain controls on exterior lighting. In particular, the regulations require that display lighting (defined as the use of artificial light for decorative purposes or to direct attention to the providers of goods or services or to illuminate direct attention to signs advertising goods or services, display of goods, objects or designs symbolic of commercial enterprises or trademarks, or landscaping or other exterior effect) shall not be permitted during an electrical power shortage pursuant to Section 12.40.030 of the LACC. The aesthetic policies of the LACC applicable to the Project (as well as an analysis of project consistency) are presented in Subsection 3.d, Project Impacts, below.

(c) Rowland Heights Community Standards District

The portion of the Project Site located in the County is within the Rowland Heights Community Standards District (CSD) established under Title 22, Section 22.44.132 of the LACC. The CSD was established to ensure the compatibility of new development with adjacent residential uses, if any, and to impose development standards and review protocols to ensure that commercial development, associated signage, landscaping, and setbacks are appropriate for the community. Standards that would be applicable to the proposed C-3 zone include the prohibition of roof signs and allowing a maximum height of 20 feet for free-standing signs. Any commercial center with three or more businesses must prepare a sign program to be submitted for approval by the Director of Planning. No buildings shall exceed a height of 45 feet above grade, excluding chimneys and rooftop antennas, unless building height above 45 feet is approved via the County's discretionary Development Program Conditional Use Permit process, as has been requested by the Applicant for the Project's proposed hotel buildings. Aesthetic policies of the CSD that are applicable to the Project are provided in Subsection 3.d, Project Impacts, below.

(d) Rowland Heights Community Plan

The portion of the Project Site located within Rowland Heights is subject to the Rowland Heights Community Plan, as well as the land use classification of the County's General Plan Land Use Policy Map. The Project Site is designated as "Major Industrial" under the General Plan Land Use Map and "Industrial" under the Rowland Heights Community Plan. The designation means that properties are planned for land manufacturing, warehousing, and heavy commercial uses. Policies of the Rowland Heights Community Plan establish a common purpose and serve as a guide to agencies responsible for implementations. The aesthetic policies of the Rowland Heights Community Plan applicable to the Project (as well as an analysis of project consistency) are presented in Subsection 3.d, Project Impacts, below.

(3) City of Industry

(a) City of Industry General Plan

As noted, the northerly portion of the Project Site (0.79 acres) is located within the City of Industry. The guiding vision of the City of Industry General Plan is to provide an employment base and commercial and business hub. Objectives are to maintain a vibrant economy, enhance property values, be a responsible steward of its resources (which include providing prudent public ownership and infrastructure to support future growth), and to be a considerate neighbor.⁹ The aesthetic policies of the City of Industry General Plan that are applicable to the Project (as well as an analysis of project consistency) are listed in Subsection 3.d, Project Impacts, below.

⁹ *City of Industry General Plan, adopted June 12, 2014.*

(b) City of Industry Municipal Code

The City of Industry Municipal Code identifies land use categories, development standards, and other general provisions that ensure consistency between the City's General Plan and proposed development projects. The City's Municipal Code includes provisions to minimize visual and light and glare impacts associated with new development projects; these are applicable to the Project. The City also has Standards and Requirements of Landscape and Irrigation Plans that would guide the design of landscaping plans submitted for development and redevelopment projects. The aesthetic goals and policies of the City of Industry Municipal Code applicable to the Project (as well as an analysis of project consistency) are provided in the Subsection 3.d, Project Impacts, below.

3. ENVIRONMENTAL IMPACTS**a. Methodology****(1) Visual Character**

The evaluation of visual character pertains to the degree and nature of contrast between the Project and its surroundings. In the analysis of visual character, the existing visual properties of the Project Site are compared to the expected appearance of the Project Site and the surrounding area to determine whether the visual character of the area would be degraded. Factors such as changes in the appearance of the Project Site, building height and massing, setbacks, landscape buffers, and other features are taken into account. The evaluation, therefore, considers the amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered or demolished. It takes into consideration the amount of natural open space to be graded or developed, the degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the Site through appropriate design, the degree of contrast between proposed features and existing features that represent the area's valued aesthetic image, the degree to which the Project would contribute to the area's aesthetic value, and applicable guidelines and regulations.

(2) Light and Glare

The effects of a project's artificial light sources are contextual and depend upon the existing lighting environment, light intensity, and proximity to light sources. Light impacts may include visual prominence, decrease of available views, alterations to the nature of a community or neighborhood character, or illumination of a sensitive land use. The analysis of light and glare identifies the location of light-sensitive land uses and describes the existing ambient conditions on the Project Site and in the Project vicinity. The analysis describes the Project's proposed light and glare sources, and the extent to which Project lighting, including illuminated signage, would spill off the Project Site onto light-sensitive areas. The analysis also describes the affected street frontages, the direction in which the light would be focused, and the extent to which the Project would illuminate sensitive land uses. The analysis also considers the potential for sunlight to reflect off building surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles or other activities.

(3) Shade/Shadow

The evaluation of shading impacts is based on shading diagrams which show the adjacent off-site shade-sensitive uses that would be shaded. The shading diagrams reflect existing and proposed nearby uses that could potentially contain shade-sensitive areas, shading time durations, and shading threshold limits established for purposes of CEQA compliance. Sensitive uses include routinely usable outdoor spaces associated with residential, recreational or institutional uses, commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. The shading durations evaluated include shading that would occur on the winter solstice between 9 A.M. Pacific Standard Time (PST) and 3 P.M. PST, and during the summer solstice and fall and spring equinoxes between 9:00 A.M. Pacific Daylight Time (PDT) and 5:00 P.M. PDT. The duration of shading that would occur is compared to threshold standards.

b. Thresholds of Significance

The potential for aesthetic impacts is based on thresholds derived from the County's Initial Study Checklist questions, which are based in part on Appendix G of the State *CEQA Guidelines*. These questions are as follows:

1. Aesthetics. Would the project:

- a) Have a substantial adverse effect on a scenic vista?
- b) Be visible from or obstruct views from a regional riding or hiking trail?
- c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?
- d) Substantially degrade the existing visual character or quality of the site and its surroundings because of height, bulk, pattern, scale, character, or other features?
- e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?

The Initial Study determined that the Project would have no impact or less than significant impacts with respect to: a) adverse effects on scenic vistas, b) visibility from a regional riding or hiking trail, or c) substantially damage scenic resources within a State scenic highway [corridor]. Accordingly, these environmental topics are not evaluated in this EIR.

Based on these factors, the Project would have a potentially significant impact on aesthetics if it would:

- AES-1** Substantially degrade the existing visual character or quality of the site and its surroundings because of height, bulk, pattern, scale, character, or other features.
- AES-2** Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area.

c. Project Characteristics or Design Features

(1) Project Construction

The Project would result in the subdivision of the Project Site (that portion within the County) into three parcels, including Parcel 1, in the eastern portion of the Project Site and Parcels 2 and 3 in the western portion of the Project Site (see **Figure 2-4**, *Conceptual Site Plan*, in Chapter 2.0, Project Description, of this Draft EIR). Project construction would occur in two major phases as follows:

(1) Phase 1 consists of the buildout of Parcel 1 (Commercial Center) and the full-service Hotel A and associated subterranean parking that will be built on Parcel 2. The construction of surface parking and utility infrastructure improvements on the parcel in the City of Industry (the northern 0.79-acre of the Project Site), including undergrounding of the existing surface storm drain channel, would also be undertaken as part of Phase 1.

(2) Phase 2 consists of the construction of Hotel B and associated subterranean parking on Parcel 3.

As part of Project construction, all ACE improvements on the Project Site related to the Nogales Street Grade Separation Project would be removed. Construction activities would include excavation or grading of approximately 192,000 cubic yards (cy) of soil, the majority of which (approximately 130,500 cy), would be reused as fill or to raise the finished grade at the northern end of the property. Screened construction fencing would be used around active construction areas.

(2) Project Operations

The Project consists of the development of four commercial/retail buildings on the eastern portion of the Project Site and two hotels on the western portion. The commercial/retail buildings would be one and two stories in height, rising to a maximum height of approximately 35 feet. The two hotels would each be six stories tall and rise to a maximum height of approximately 80 feet (Hotel A on Parcel 2) and 73 feet for (Hotel B on Parcel 3). Surface parking would be minimized with the development of a combination surface, structured, and subterranean parking spaces. Approximately 506 surface parking spaces and 183 subterranean parking spaces would be provided for the commercial/retail component. Approximately 137 surface parking spaces and 123 subterranean spaces would be provided for Hotel A and approximately 74 surface parking spaces and 63 subterranean parking spaces would be provided for Hotel B. Approximately 75 spaces would be provided at the north edge of the Project Site in the City of Industry. Surface parking would also be provided on Parcel 3 until construction for Phase 2 (on Parcel 3) commences. Of the total 1,161 spaces provided, 269 spaces would be contained within subterranean structures.

The landscape plan for the Project is illustrated in **Figure 4.A-6**, *Landscape Site Plan*, below. As shown in Figure 4.A-6, five percent of the parking areas would be landscaped (five percent required under the LACC), and 12.9 percent of the perimeter would be landscaped (10 percent required under the LACC). As shown in Figure 4.A-6, landscaping would consist of a combination of trees, shrubs, and ground covers, with such tree species as pine, poplar, crepe myrtle, Brisbane box, and date palm. Of the shrubs and ground covers, 75 percent would be drought-tolerant, consistent with County requirements. Trees would be started from 32- and 36-inch boxes and shrubs and ground covers would be started from five- and 15-gallon containers. Landscape installation would be permanently maintained through agreements required as part of the permit processes with the County of Los Angeles and City of Industry.

Architectural amenities associated with the Project include a porte cochere between the two hotels, a concourse or promenade leading from the porte cochere to the Commercial Center, articulation of building surface wall through design and variety of materials, building height variations, and public-access landscaped open space within the Commercial Center. Building facades that face the street would consist of materials or designs distinguishable from the rest of the façade, such as offset planes and other architectural accents. **Figure 4.A-7**, *Exterior Elevations for Building 1-Parcel 1*, **Figure 4.A-8**, *Exterior Elevations for Building 2-Parcel 1*, **Figure 4.A-9**, *Exterior Elevations for Building 3-Parcel 1*, and **Figure 4.A-10**, *Exterior Elevations for Building 4-Parcel 1* illustrate the exterior finishes and architectural treatments for the Commercial Center. Figures 2-5 through 2-10 in Chapter 2.0 of this Draft EIR illustrate architectural renderings of the Commercial Center as viewed from the Project Site interior and as it would appear from Gale Avenue. As shown in the latter renderings, the Commercial Center would include pedestrian amenities, sidewalk treatment, and landscaped public gathering space.

Figure 4.A-11, *Exterior Elevations for Hotel A*, and **Figure 4.A-12**, *Exterior Elevations for Hotel B* illustrate the exterior surface treatment and design for the two hotel buildings. The architectural design for Hotel A, located along Gale Avenue, includes articulation with varied building heights, setbacks, curves, balconies, rooftops, and other features. The six-story component of Hotel A would be U-shaped, with the central portion of the hotel (along the west facade) a one-story-high ballroom. Another distinguishing architectural feature would be the glass lounge, a circular structure located along Gale Avenue at the southwest corner of the building. Surface treatment for Hotel A, as illustrated in **Figure 4.A-13**, *Exterior Surface Treatment for Hotel A*, includes clear glazing with storefront system for the ground floor, solar blue Pacifica glazing with storefront system for guest rooms, laminated panel systems (old town gray), varied paint finishes, and stone cladding. Figure 4.A-11, which illustrates the entrance design for Hotel A, depicts the east elevation of the hotel.

Hotel B would reflect Hotel A's design theme in certain vertical features and height, but would have a different overall design. The east elevation of Hotel B would be more strongly articulated, with courtyards and setbacks facing the Commercial Center.

One Project objective is to enhance the pedestrian experience along Gale Avenue and to provide street-level pedestrian connectivity to the Project Site through the provision of landscaped setbacks on the street frontage, landscaped pedestrian walkways through the Site, and a dedicated pedestrian connection separate from vehicle driveways. Development within the Rowland Heights portion would be subject to specific development standards set forth in the LACC and Rowland Heights Community Plan, including permitted lot coverage, front and side yard building setbacks, and landscaping requirements. In accordance with those standards, the Project would maintain 40 percent lot coverage maximum and a minimum 15-foot landscaped setback from the property line along Gale Avenue. A Sign Program for the Project would be submitted for approval to the Director of Planning.

The existing storm drain in the north section of the Project Site would be replaced with a 90-inch underground pipe connecting to the County storm drain system to the east and City of Industry storm drain system to the west. The new underground storm drain would be constructed at the same elevation as the current storm drain channel, which is the lowest point on the Project Site, to maintain existing points of connection with off-site infrastructure. Fill placement in the northern Project Site would raise the elevation of finished grade an average of five feet above the average grade, exclusive of the depressed storm drain



PARCEL 1 - RETAIL

NET LAND AREA (NOT INCLUDING ADJACENT CITY OF INDUSTRY LAND)	353,730 SF	
LESS GROUND FLOOR BUILDINGS AREA	- 98,945 SF	
LAND AREA FOR LANDSCAPE COVERAGE CALCULATION	254,785 SF	
PARKING LOT LANDSCAPE AREA (5% REQUIRED)	12,739 SF	(5%)
PERIMETER LANDSCAPE AREA (10% REQUIRED)	25,479 SF	(10%)
TOTAL LANDSCAPE AREA	38,218 SF	(15%)

PARCEL 2 - HOTEL A

NET LAND AREA	140,081 SF	
LESS GROUND FLOOR BUILDINGS AREA	- 53,281 SF	
LAND AREA FOR LANDSCAPE COVERAGE CALCULATION	86,460 SF	
PARKING LOT LANDSCAPE AREA (5% REQUIRED)	11,186 SF	(5.1%)
PERIMETER LANDSCAPE AREA (10% REQUIRED)	4,462 SF	(12.9%)
TOTAL LANDSCAPE AREA	15,648 SF	(18%)

PARCEL 3 - HOTEL B

NET LAND AREA (NOT INCLUDING ADJACENT CITY OF INDUSTRY LAND)	84,003 SF	
LESS GROUND FLOOR BUILDINGS AREA	- 37,600 SF	
LAND AREA FOR LANDSCAPE COVERAGE CALCULATION	46,403 SF	
PARKING LOT LANDSCAPE AREA (5% REQUIRED)	16,500 SF	(14.6%)
PERIMETER LANDSCAPE AREA (10% REQUIRED)	26,900 SF	(11.2%)
TOTAL LANDSCAPE AREA	9,631 SF	(25.8%)

PLANT PALETTE

Symbol	Botanical Name	Common Name	WUCOLS Region 4
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TREES			
	<i>Pinus sp.</i>	Pine	Mod
	<i>Populus sp.</i>	Poplar	Mod
	<i>Lagerstroemia indica</i>	Grape Myrtle	Mod
	<i>Lophostemon confertus</i>	Brisbane Box	Mod

PALMS			
	<i>Phoenix dactylifera</i>	Date Palm	Low

Symbol	Botanical Name	Common Name	WUCOLS
	<i>Anigozanthus flavidus</i>	'Red Cross' Kangaroo Paw	Low
	<i>Callistemon v. 'Little John'</i>	Dwarf Bottlebrush	Low
	<i>Dianella t. 'Variegata'</i>	Variegated Dianella	Low
	<i>Elaeagnus pungens</i>	Silverberry	Low
	<i>Echeveria 'Afterglow'</i>	Echeveria	Low
	<i>Grevillea lanigera</i>	'Mt. Tamboritha' Woolly Grevillea	Low
	<i>Grevillea 'Noelii'</i>	Grevillea	Low
	<i>Aloe striata</i>	Coral Aloe	Low
	<i>Hemerocallis hybrids</i>	Daylily	Mod
	<i>Hesperaloe parviflora</i>	Red Yucca	Low
	<i>Penstemon h. 'Margarita Bop'</i>	Blue Bedder Penstemon	Low
	<i>Leucophyllum frutescens</i>	'White Cloud' Texas Ranger	Low
	<i>Muhlenbergia rigens</i>	Deer Grass	Mod
	<i>Westringia f. 'Morning Light'</i>	Coast Rosemary	Low
	<i>Phormium 'Yellow Wave'</i>	New Zealand Flax	Mod
	<i>Berberis 'Crimson Pygmy'</i>	Dwarf Japanese Barberry	Low
	<i>Rhus integrifolia</i>	Lemonade Berry	Low
	<i>Myrtus c. 'Compacta'</i>	Dwarf Myrtle	Low
	<i>Rosmarinus o. 'Huntington Carpet'</i>	Rosemary	Low
	<i>Rosa 'Flower Carpet Pink'</i>	Groundcover Rose	Mod
	<i>Rosa 'Flower Carpet White'</i>	Groundcover Rose	Mod
	<i>Pennisetum orientale</i>	Fountain Grass	Low
	<i>Salvia greggii 'Flame'</i>	Furman's Red Autumn Sage	Low

NOTES:

PLANT MATERIAL NOT LISTED MAY BE USED, SUBJECT TO APPROVAL BY THE CITY.

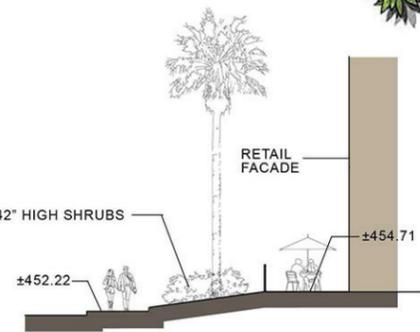
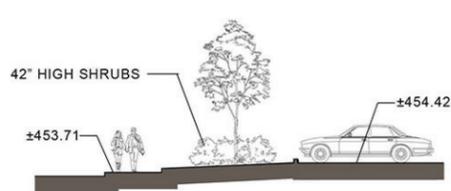
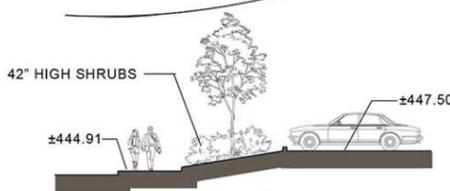
ALL LANDSCAPE PLANS AND INSTALLATIONS SHALL ADHERE TO CITY DESIGN GUIDELINES, CODES AND REGULATIONS.

ALL LANDSCAPE AREAS SHALL RECEIVE AUTOMATIC IRRIGATION SYSTEM.

ALL LANDSCAPE INSTALLATION SHALL BE PERMANENTLY MAINTAINED.

A MINIMUM OF SEVENTY-FIVE (75) PERCENT OF THE TOTAL LANDSCAPE AREA SHALL CONTAIN PLANTS FROM COUNTY OF LA APPROVED DROUGHT TOLERANT PLANT LIST.

TREES TO HAVE A BOX SIZE OF 24" AND 36". GROUND COVER AND SHRUBS TO BE A MIXTURE OF 5 AND 15 GALLON SIZE. FINAL LOCATIONS OF SPECIFIC BOX/GALLON SIZED TREES, SHRUBS/GROUND COVERS TBD WITH PERMIT DWG. PACKAGES



SECTION A-A

SECTION B-B

SECTION C-C



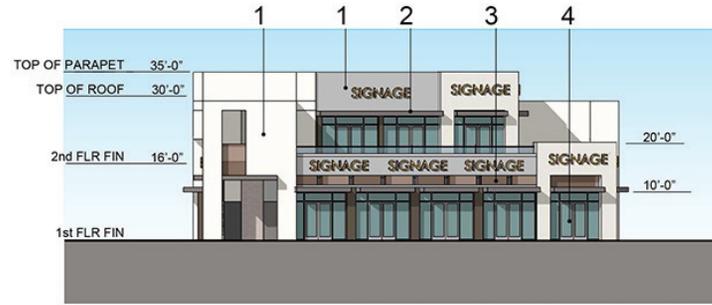
Landscape Site Plan

Rowland Heights Plaza and Hotel Project
Source: Parallax Investment Corporation; Architects Orange; Conceptual Design and Planning Company, 2015.

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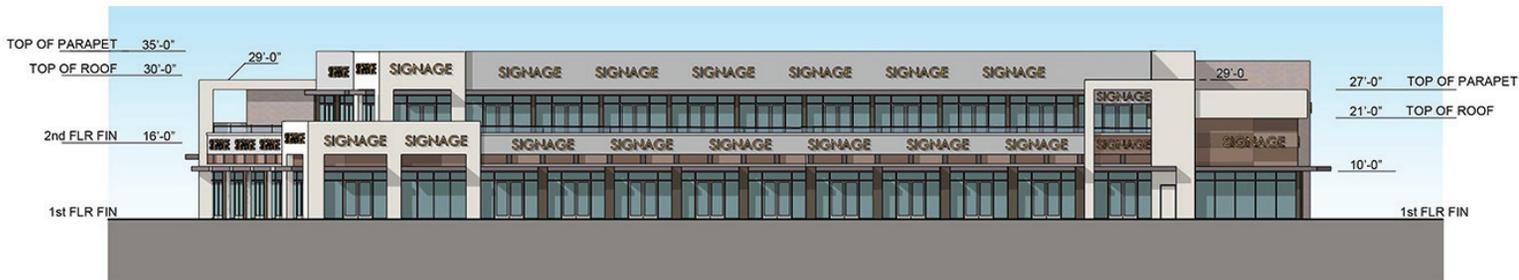
NORTH ELEVATION



SOUTH ELEVATION
(Facing Gale Ave.)



WEST ELEVATION



EAST ELEVATION



KEY PLAN

KEY NOTES:

- 1 Painted Cement Plaster Finish w/ Reveal
- 2 Metal Canopy
- 3 Painted Cement Plaster Finish w/ Tile Accent
- 4 Alum. Storefront



Exterior Elevations for Building 1 - Parcel 1

Rowland Heights Plaza and Hotel Project

Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2014.

FIGURE

4.A-7



NORTH ELEVATION

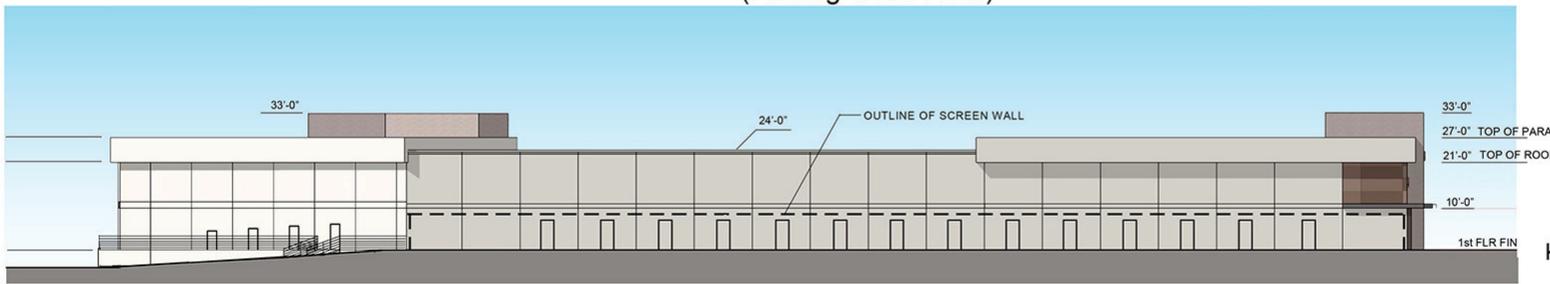


EAST ELEVATION

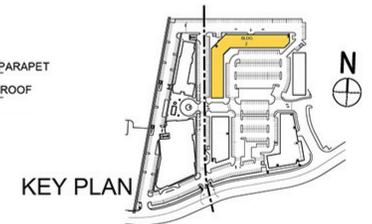
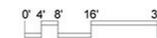
- KEY NOTES:
- 1 Painted Cement Plaster Finish w/ Reveal
 - 2 Metal Canopy
 - 3 Painted Cement Plaster Finish w/ Tile Accent
 - 4 Alum. Storefront
 - 5 Veneer Finish



SOUTH ELEVATION
(Facing Gale Ave.)



WEST ELEVATION



Exterior Elevations for Building 2 - Parcel 1

Rowland Heights Plaza and Hotel Project

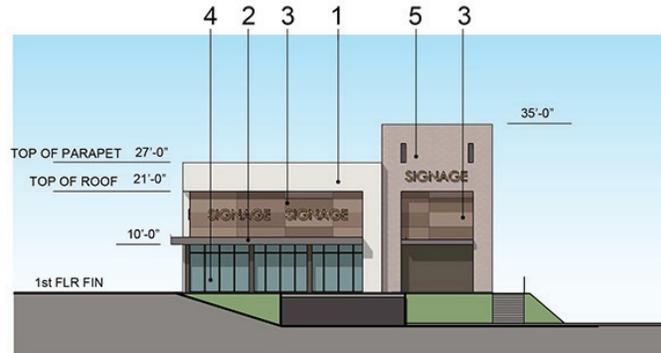
Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2014.

FIGURE

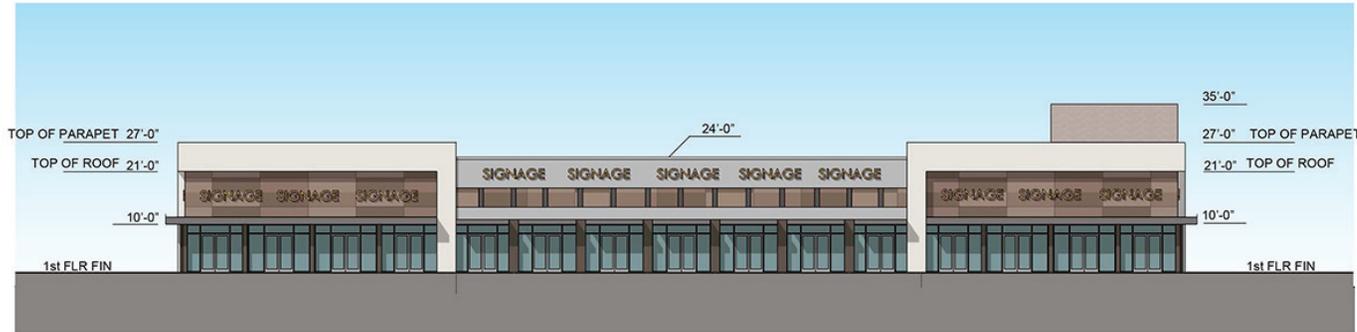
4.A-8



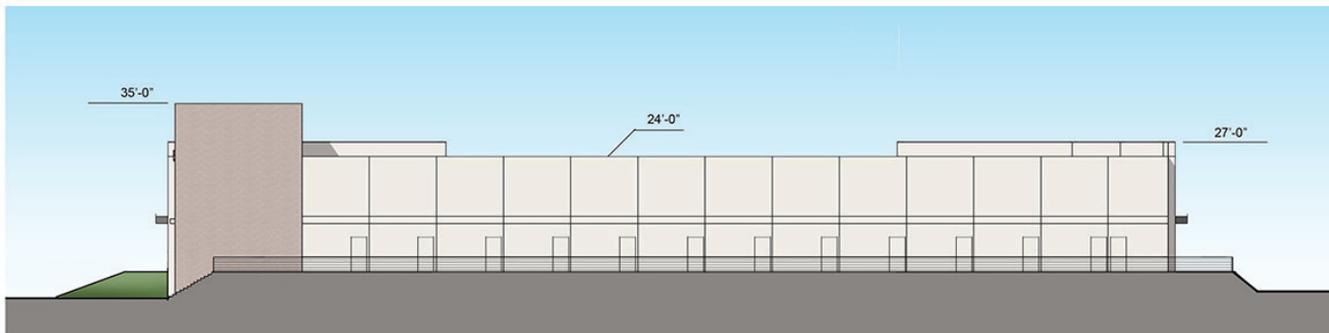
NORTH ELEVATION



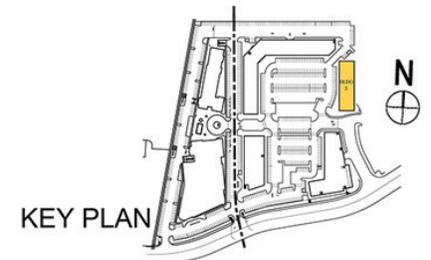
SOUTH ELEVATION
(Facing Gale Ave.)



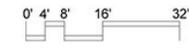
WEST ELEVATION



EAST ELEVATION



- KEY NOTES:
- 1 Painted Cement Plaster Finish w/ Reveal
 - 2 Metal Canopy
 - 3 Painted Cement Plaster Finish w/ Tile Accent
 - 4 Alum. Storefront
 - 5 Veneer Finish



Exterior Elevations for Building 3 - Parcel 1

Rowland Heights Plaza and Hotel Project

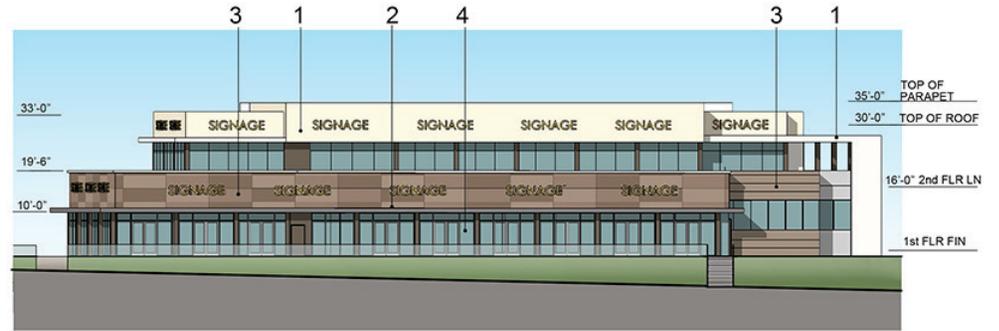
Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2014.

FIGURE

4.A-9



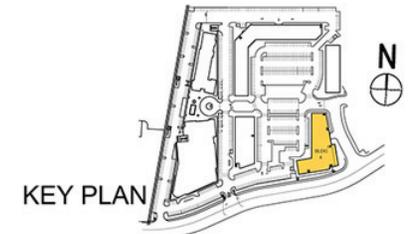
NORTH ELEVATION



SOUTH ELEVATION
(Facing Gale Ave.)



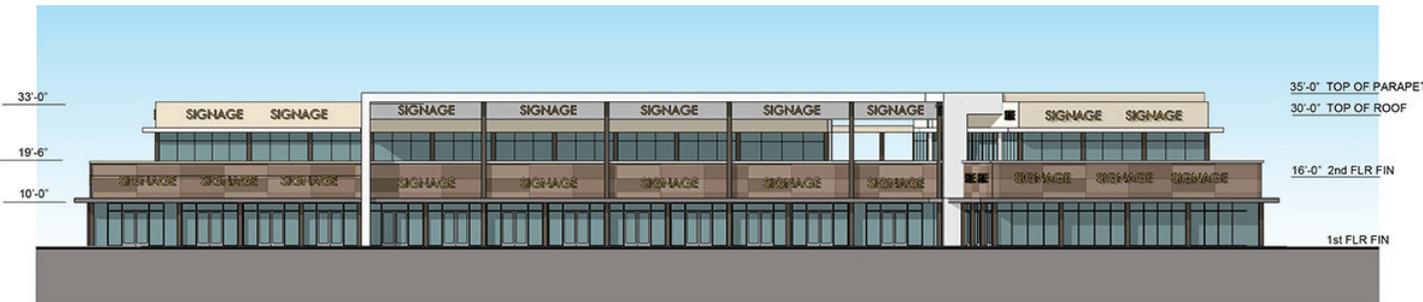
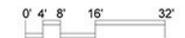
EAST ELEVATION



KEY PLAN

KEY NOTES:

- 1 Painted Cement Plaster Finish w/ Reveal
- 2 Metal Canopy
- 3 Painted Cement Plaster Finish w/ Tile Accent
- 4 Alum. Storefront



WEST ELEVATION



Exterior Elevations for Building 4 - Parcel 1

Rowland Heights Plaza and Hotel Project

Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2014.

FIGURE

4.A-10



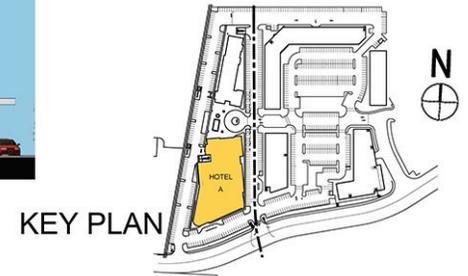
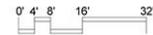
EAST ELEVATION



SOUTH ELEVATION



NORTH ELEVATION

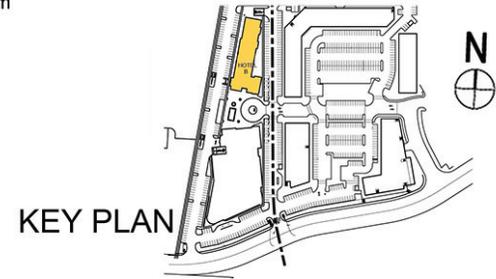
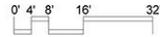


KEY PLAN



NORTH ELEVATION

- G-1 aluminum and clear glass storefront system
- G-2 tinted glazing with aluminum frame
- M-1 laminated metal panel
- M-2 architectural metal grille
- S-1 paint on smooth cement plaster
- S-2 paint on smooth cement plaster
- S-3 paint on smooth cement plaster
- ST-1 cultured stone



KEY PLAN



WEST ELEVATION



EAST ELEVATION



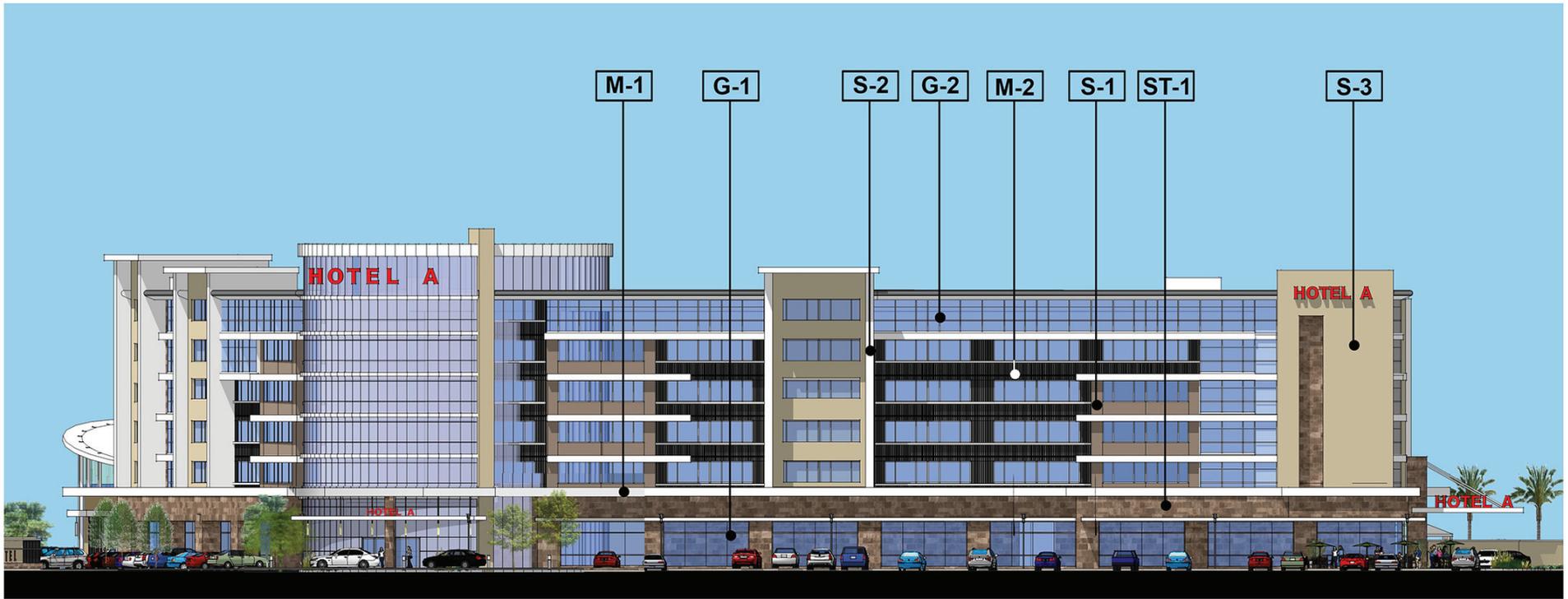
Exterior Elevations for Hotel B

Rowland Heights Plaza and Hotel Project

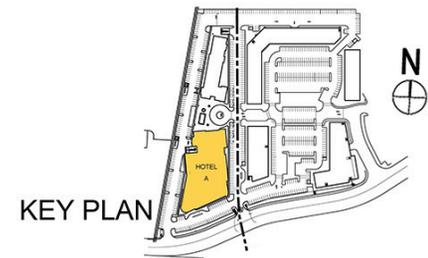
Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2014.

FIGURE

4.A-12



- G-1 CLEAR GLAZING WITH ALUMINUM STOREFRONT SYSTEM FOR GROUND FLOOR
- G-2 SOLAR-BLUE PACIFICA GLAZING WITH ALUMINUM STOREFRONT SYSTEM FOR GUEST ROOMS
- M-1 METAL PANEL SYSTEM AND CANOPY, COLOR: BONE WHITE
- M-2 LAMINATED METAL PANEL SYSTEM, COLOR: OLD TOWN GRAY
- S-1 PAINT FINISH ON CEMENT PLASTER, SMOOTH INTEGRAL FINISH, COLOR: TRABUCO
- S-2 PAINT FINISH ON CEMENT PLASTER, SMOOTH INTEGRAL FINISH, COLOR: DOVE GRAY
- S-3 PAINT FINISH ON CEMENT PLASTER, SMOOTH INTEGRAL FINISH, COLOR: PURE IVORY
- ST-1 STONE CLADDING SYSTEM, LIMESTONE BRICK VENEER, COLOR: ASHLAR COURSE



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channel. A masonry retaining wall would be constructed along the northern property boundary and portions of the northeastern and northwestern property boundaries to retain fill soil and accommodate the finished grade elevation differential between the Project Site and adjacent off-site properties. The retaining wall along the northern property line would be approximately 680 feet in length and approximately 10.5 feet in height above existing grade on the adjacent UPRR/Metrolink right-of-way to the north. The retaining wall along the northeastern property line would be approximately 157 feet in length and rise from two to 8.5 feet in height above existing grade on the Rowland Heights Plaza Shopping Center property to the east. The retaining wall along the northwestern property line would be approximately 184 feet in length and rise from two to 7.5 feet in height above existing grade along The Concourse Business Park property to the west. The walls would rise approximately one foot in height above finished grade on the Project Site. As shown in Figure 4.A-6, Landscape Site Plan, the boundary along the retaining wall would be planted with Brisbane box trees and poplars to form a solid hedge of vegetation. Landscaping, which would soften the edge of the retaining wall and screen the proposed parking area from the tracks and Railroad Street, would comprise approximately 0.20 acres (approximately 8,712 square feet). This landscaped acreage represents approximately 25 percent of the 0.79-acre parcel within the City of Industry.

d. Project Impacts

(1) Visual Character

Threshold AES-1: A significant impact would occur if the project would substantially degrade the existing visual character or quality of the site and its surroundings because of height, bulk, pattern, scale, character, or other features.

Impact Statement AES-1: *The height of the two hotel buildings would contrast with the existing low-rise setting of the area. However, the Project's design—including the articulation of roof features on the proposed hotel buildings, strong horizontal and vertical design features, color variations and coordination of the building design, landscaping and streetscape, setbacks, pedestrian amenities and open space within the Commercial Center on Parcel 1, and the Project's consistency with applicable plans and regulations—would enhance the aesthetic value of the location. Because the Project would be well separated from residential uses south of SR-60 and would be a compatible use with surrounding commercial/industrial development, it would not substantially degrade the aesthetic character of the Site or its surroundings because of height, bulk, pattern, scale, character, and other features. Impacts with respect to visual character would be less than significant.*

(a) Construction

Construction activities typically result in site disturbance, movement of construction equipment, import and export of materials, views of incomplete buildings and other activities that generally contrast with the visual character of an area. Construction activities would be visible from Gale Avenue and surrounding commercial and industrial land uses. Construction activities would entail the removal of all ACE improvements on the Project Site related to the Nogales Street Grade Separation Project. Excavation would be performed to provide for building footings and subterranean parking. Excavated soils would be used to raise the gradient of the north sector of the Project Site, which is currently approximately 30 feet lower in grade (approximately 438 feet AMSL) compared to the center of the Project Site (approximately 468 feet AMSL). The ACE improvements do not constitute substantial aesthetic resources, and the removal of such would not affect existing on-site resources. The use of cranes would be required for the construction of the Project's

components. Construction would also involve the disturbance of the sidewalks and roadways along the existing site for the widening of Gale Avenue, construction of new sidewalks, curbs, and utility lines in the street right-of-way.

Demolition, grading, and construction of new buildings, sidewalk improvements, and installation of landscaping would be visually disruptive while these activities occur. Construction would occur over an approximate maximum of 36 months (18 months for Phase 1 and 18 months for Phase 2). This period would be shorter if Phase 2 construction were to overlap or occur concurrently with Phase 1. Because of the relatively short-term nature of construction, the use of construction fencing which would partially screen construction activities, and the lack of visual resources on the Site and surrounding area, construction activities would result in a less than significant impact on the existing visual character of the Project Site.

(b) Project Operation

The Project would introduce two six-story hotels within a substantially low-rise area that could potentially contrast with the existing visual character.

The new commercial/retail buildings and hotels would incorporate modern architectural character and high-quality building materials. The articulation of exterior facades, installation of landscaping along Gale Avenue, and building setbacks would be consistent with the commercial frontage along Gale Avenue. In addition, the Project would provide pedestrian amenities which do not currently exist along Gale Avenue, and pedestrian amenities such as public-use landscaped open space within the Commercial Center, and a promenade linking the hotels to the Commercial Center. These amenities would contribute to the aesthetic character of the area.

Surface parking would be located along the south, west, and north edges of the Project and within the Commercial Center interior. Surface parking along Gale Avenue would be set back and screened from the street by a 42-inch-high shrubs and lawn. Surface parking along the west edge of the Site would face a surface parking lot for The Concourse Business Park to the west and as such, would not create a visual contrast or nonconformity with the adjacent use. Landscaping would be provided along these two interfacing parking areas. Parking on the north edge of the Project Site would face the UPRR tracks and Railroad Street. Trees and shrubs, which would screen the surface parking from the railroad and Railroad Street, would be planted along the north property boundary.

Signs would be placed on building walls and would not be located on the rooftops of the Commercial Center or the hotel buildings. Because commercial and industrial development and SR-60 are located in the immediate and surrounding vicinity of the Project, the Project would not substantially change the existing developed character of the area. All utility lines would be located below ground. In this manner, would not contrast with existing aesthetic conditions.

Overall, the existing visual quality of Gale Avenue and the SR-60 corridor is mixed. Although low-rise, some existing industrial and commercial buildings in the area feature large blank walls or contain few interesting visual features. The rooftops of existing low-rise industrial buildings are generally featureless, and the buildings present large, flat gray or white walls. Commercial uses along Gale Avenue provide more interesting visual elements, including the red gable roof on the Best Western hotel and streetscape along Gale Avenue, than the general mix of industrial and fast food uses in the area. Components of the Project

would contribute positively to the character of the area, including the provision of streetscape and architecturally interesting building features.

The six-story hotel on Parcel 2 would have a maximum height of 80 feet above ground level (including rooftop features); the six-story hotel on Parcel 3 would have a maximum height of 72 feet 4 inches. Currently, the tallest structures in the area are highway-oriented pole signs at the Nogales Street/SR-60 interchange, which do not exceed 45 feet above ground level. Buildings in the immediately adjacent area are primarily two and three stories high. Because the hotels would be taller than existing buildings and signs, they could be considered out of scale with existing development in the area. While the Project Site is separated from the nearest residential use by a distance of more than 300 feet, the two proposed hotels would be visible from residential neighborhoods south of SR-60. These views, however, would not be considered to be adversely impacted by the Project since SR-60 would be the most immediately visible feature. Also, because the Project would consist of a high-quality architectural design, it would not substantially degrade the aesthetic character of the Site and surroundings because of the scale of development.

The hotel buildings would maintain setbacks from adjacent low-rise uses, including the Rowland Heights Plaza to the east, Best Western hotel and Mandarin Plaza to the south, The Concourse Business Park to the north, the railroad tracks to the north, and industrial/manufacturing buildings to the north of Railroad Street. The hotel guestroom wing along Gale Avenue would be located approximately 86 feet (30 feet within the Project Site and approximately 56 feet across The Concourse Park parking lot) from the east wall of the adjacent Concourse Business Park, approximately 330 feet from the west wall of the Best Western hotel (the nearest use to the south), approximately 800 feet from the Rowland Heights Plaza buildings, and approximately 200 feet from industrial buildings to the north of Railroad Street. Although the Project's mid-rise component would contrast with the low-rise character of these adjacent areas, it would not crowd existing buildings nor create a strong juxtaposition of contrasting uses.

Based on the discussion above, the overall Project would contribute positively to the aesthetic character of the area. Therefore, it would not be considered to substantially degrade the existing visual character or quality of the site and its surroundings as a result of height, bulk, pattern, scale, character, and other features. With the balance between features that would contrast with existing conditions and those that would complement existing conditions, the impact of the Project with respect to visual character would be less than significant.

(c) Policy Consistency

(i) County of Los Angeles General Plan

The Los Angeles County General Plan establishes programs to foster healthy, livable, and sustainable communities. The Conservation and Open Space Element includes objectives intended to protect open space resources, scenic beauty, and the conservation and use of natural resources that are considered to be related to aesthetic value. Strategies to implement these objectives are contained in the Implementation Chapter of the General Plan. **Table 4.A-1, Comparison of the Project to Aesthetic Policies of the Los Angeles County General Plan Chapter 8, Implementation**, compares the Project to applicable implementation policies of the

Table 4.A-1

**Comparison of the Project to Aesthetic Policies
of the Los Angeles County General Plan
Chapter 8, Implementation**

Policy	Analysis of Consistency
<p>Infill and Expansion Priorities: Institute a development qualification procedure to ensure that new development will occur in a manner consistent with stated Plan policies. Criteria include compatibility with preservation of significant natural resources (page VIII-19).</p>	<p>Consistent: The Project Site would be developed within an existing urbanized area, surrounded by commercial and industrial uses. Although the Project Site is currently undeveloped, it does not constitute a significant natural resource. The Project Site is not identified in the General Plan as a scenic or historical site. As an infill development, the Project would be compatible with the existing, adjoining commercial land uses. The six-story hotel buildings would be taller than adjacent low-rise uses; however, deep setbacks would avoid crowding of contrasting buildings. Other Project mitigation measures would balance the aesthetic effects of contrasting building heights. Development on an urban infill site would reduce demand for development within significant natural resource areas listed in the General Plan.</p>
<p>Policy II-1: Amend the County Zoning and Subdivision Ordinances and Building and Grading Codes as necessary to carry out the intent of the open space and special management area policies for agricultural protection, significant ecological areas, mineral resources, scenic highway corridors, flood prone areas, and hillside management (page VIII-33).</p>	<p>Consistent: The Project Site is located within a highly developed area and would not visually affect significant ecological areas or scenic highway corridors.</p>

Source: PCR Services Corporation, 2015.

General Plan Implementation Chapter. As shown in Table 4.A-1, the Project would be consistent with the General Plan Implementation Chapter policies related to the objectives of the Conservation and Open Space Element regarding infill and protection of natural resources. Because the Project would be consistent with applicable aesthetic policies of the General Plan Implementation Chapter, aesthetic impacts would be less than significant. (ii) County of Los Angeles Code

(ii) County of Los Angeles Code

The LACC contains regulations regarding aesthetic character, sign regulations, landscape design, and lighting. **Table 4.A-2, Comparison of the Project to Applicable Aesthetic Policies of the Los Angeles County Code**, compares the Project to applicable policies. As shown in Table 4.A-2, the Project would comply with applicable regulations related to signs, landscaping, and display lighting. Because the Project would be in compliance with applicable aesthetic requirements of the LACC, aesthetic impacts would be less than significant.

Table 4.A-2

Comparison of the Project to Applicable Aesthetic Policies of the Los Angeles County Code

Policy	Analysis of Consistency
Title 26. - Sign Regulations:	
Section 6502.2. A building permit is required for every sign and sign structure regulated under the LACC. Where signs are illuminated by electricity, a separate electrical permit shall be obtained as required by the Electrical Code, Title 27 of the Los Angeles County Code.	Consistent: The Project’s Sign Program would be submitted for approval to the Director. Permits would be obtained for signs and electrical permits for lighting in accordance with the LACC.
Section 6502.7: No sign shall be erected that would interfere with, mislead or confuse traffic.	Consistent: All signs would be reviewed by the Regional Planning Department (Director) to ensure that signs would not interfere with, mislead, or confuse traffic.
Section 6502.10. Signs and sign structures shall be maintained at all times in a state of good repair and be able to withstand wind pressure.	Consistent: The development must abide by County building and maintenance codes, including maintenance of facilities and signs. The enforcement of this LACC requirement by the County would ensure that signs be maintained in a state of good repair.
Title 31. Green Code	
Section 4.106.5. A project shall not provide more than 25 percent turf within the total landscaped area; non-invasive drought-tolerant plant and tree species appropriate for the climate zone shall be utilized in at least 75 percent of the total landscaped area; and hydrozoning irrigation techniques shall be incorporated into the landscape design. Title 31 also requires energy efficiency, which applies to the design of interior and exterior lighting fixtures.	Consistent: The landscape plan in Figure 4.A-6 lists proposed plant species. The majority of plantings would be drought-tolerant species, although a portion of the site would be planted with lawn along the Gale Avenue frontage. The Project must also abide by Title 31 energy efficiency requirements enforced by the Los Angeles County Department of Public Works.
Title 12. Environmental Protection	
Section 12.40.040. In an electrical power shortage emergency, no display lighting, including landscaping or the outside of a building shall be permitted.	Consistent: The Project would abide by LACC requirements to cease landscaping and building lighting during an electrical power shortage, as enforced by the County Department of Public Works.

Source: PCR Services Corporation, 2015.

(iii) Rowland Heights Community Standards District

The Rowland Heights CSD has regulations aimed at achieving compatibility of new development with adjacent residential uses, if any, and imposes development standards and review protocols to ensure that commercial development, associated signage, landscaping, and setbacks are appropriate for the community. **Table 4.A-3, Comparison of the Project to Applicable Aesthetic Policies of the Rowland Heights Community Standards District (Title 22, Section 22.44.132 of the LACC)** compares the Project to applicable aesthetic policies of the Rowland Heights CSD. The Project would not be adjacent to the nearest residential uses, which are located approximately 300 feet south of the SR-60. As shown in Table 4.A-3, the Project would be consistent with signage, landscaping, and lot coverage requirements of the CSD. The Project would only be partly consistent with maximum building

Table 4.A-3

**Comparison of the Project to Applicable Aesthetic Policies
of the Rowland Heights Community Standards District
(Title 22, Section 22.44.132 of the LACC)**

Policy	Analysis of Consistency
D. 2.a. Signs. Roof signs shall be prohibited. The maximum height of a free-standing sign shall be 20 feet.	Consistent: The Project Applicant would obtain needed permits for signs and lighting in accordance with the LACC. No roof signs would be installed on any of the Project buildings.
D. 2.a. v. Sign programs for commercial centers consisting of three or more businesses: (A) The owner or operator of a commercial center consisting of three or more businesses shall submit a sign program to the director to coordinate business signage within the commercial center. (B) The sign program shall require new business signs to comply, where applicable, with subsections D.2.a and D.3.b, and shall establish standards for sign location, style, size, color, font, materials, and any other applicable sign feature, so that all new business signs in the commercial center will be compatible with each other. (c) All new signs shall conform to the specifications set forth in the approved sign program.	Consistent: The Project Applicant would submit a Sign Program to the Director (Planning Department) which would coordinate business signage and comply with location, style, color, font, materials deemed compatible by the Director. All subsequent signs would comply with the approved Sign Program and would meet the Director’s standards regarding color, font, materials, and other requirements. All new and subsequent businesses would comply with the approved Sign Program.
D.2.c. General Landscaping. Lots or parcels of land greater than 30,000 square feet shall have a minimum landscaping of 10 percent of the net lot area. The landscaping shall consist of 24-inch and 36-inch box trees, 5 and 15 gallon-size shrubs, and ground cover, and shall be maintained with regular pruning, weeding, fertilizing, litter removal, and replacement of plants when necessary. Incidental walkways, if needed, may be developed in the landscaped area. Where applicable, landscaping shall be: i. Placed around the base of a structure in the area between the structure and the parking area; ii. Used to screen trash enclosures, parking areas, storage areas, loading areas, and public utilities from public view, to the extent that the landscaping does not prevent access thereto; and iii. Used to create a buffer with a minimum width and height of three feet between parking areas and public rights-of-way.	Consistent: Landscaping would comprise a minimum of 10 percent of the net lot area. Total landscaped area within Parcel 1 (Commercial Center) would be 10 percent; total landscaped area within Parcel 2 (Hotel A) would be 18 percent; and total landscaped area within Parcel 3 (Hotel B) would be 25.8 percent. Trees would be started from 32- and 36-inch boxes, and shrubs and ground covers will be started from a combination of five- and 15-gallon containers. Landscape installation shall be permanently maintained. Of the shrubs and ground covers, 75 percent would be drought tolerant. A minimum three-foot-wide and 3.5-foot-high landscape buffer would be planted between the surface parking area and Gale Avenue. This buffer would partially conceal vehicles in the surface parking lot.
D.2.d. Parking Lot Landscaping. Parking Lot Landscaping. Except for rooftop or interior parking, an existing or proposed parking lot with 20 or more parking spaces shall have a minimum of five percent of the gross area of	Consistent: The Project would provide a minimum of five percent of gross area for landscaping within the surface parking areas in accordance with the criteria set forth in this section. As shown in Figure 4.A-6, Landscape Site Plan, landscaping would be provided throughout surface parking areas. As shown in Figure 4.A-6, the

Table 4.A-3 (Continued)

**Comparison of the Project to Applicable Aesthetic Policies
of the Rowland Heights Community Standards District
(Title 22, Section 22.44.132 of the LACC)**

Policy	Analysis of Consistency
<p>the parking lot landscaped. This landscaping shall be counted toward the general landscaping requirement set forth in subsection D.2.c. The landscaping shall be spread throughout the parking lot to maximize its aesthetic effect and the parking lot's compatibility with adjoining uses. Where appropriate, all areas of the parking lot not used for vehicle parking, vehicle maneuvering, or pedestrian movement or activity, shall be landscaped.</p>	<p>landscaped open space and promenade leading to the hotel porte cochere would be centered relative to the Commercial Center's surface parking lot.</p>
<p>D.2.f. Lot Coverage. Except as otherwise provided in this subsection f, all new structures and additions to existing structures, when considered along with any existing structures, shall have a maximum cumulative 40 percent coverage of the net area of the lot or parcel of land. An upper floor overhang used solely for circulation, such as a walkway, shall be exempt from the lot coverage calculation, provided it has a maximum width of five feet.</p>	<p>Consistent: Proposed building footprint (ground floor area) would be 126,113 square feet. This represents approximately 36 percent lot coverage and as such, would be less than the maximum lot coverage of 40 percent.</p>
<p>D.4.b. Structure Height. A structure shall not exceed a height of 45 feet above grade; including chimneys and rooftop antennas.</p>	<p>Consistent with Approval of the CUP. Hotel A would be six stories and reach a height of 80 feet above grade. Hotel B would reach a height of 72 feet, four inches above grade. The four Commercial Center buildings would be two stories and reach a maximum height of 35 feet. As noted, the Project would require a CUP for the approval of a Development Program, which, if approved by the County's land use decision-making bodies, would allow the proposed hotel structures to exceed the maximum 45 feet above grade. As discussed above, the CSD's building height restrictions are intended to protect any adjacent residential uses, which do not occur in the Project Site vicinity.</p>

Source: PCR Services Corporation, 2015.

height requirement of 45 feet. As discussed in Table 4.A-3, the six-story hotels would be 80 feet above grade and 72 feet, four inches above grade, respectively. However, the four buildings in the Commercial Center would be two stories and reach a maximum height of 35 feet. As discussed in Chapter 2.0, Project Description, of this Draft EIR, the Project would require a discretionary Conditional Use Permit (CUP) for approval of a Development Program, which, if approved by the County's land use decision-making bodies, would allow structures to exceed the maximum height of 45 feet above grade. As discussed above, building height restrictions are intended to protect any adjacent residential uses, which do not occur in the Project

Site vicinity. Also, subject to the County’s approval of the requested CUP, the Project would be in compliance with all applicable requirements of the CSD, and impacts would be less than significant.

(iv) Rowland Heights Community Plan

The majority of the Project Site (14.06 acres) is located within the County unincorporated community of Rowland Heights and is thus subject to the Rowland Heights Community Plan. **Table 4.A-4, Comparison of the Project to Applicable Aesthetic Policies of the Rowland Heights Community Plan** compares the Project to applicable policies of the Rowland Heights Community Plan. As discussed, the Project would be consistent with policies to beautify commercial areas by providing a landscaped setback from Gale Avenue, provide landscaping in the surface parking areas, and limit freestanding signs. Because the Project would be in compliance with applicable aesthetic policies of the Rowland Heights Community Plan, aesthetic impacts would be less than significant.

Table 4.A-4

Comparison of the Project to Applicable Aesthetic Policies of the Rowland Heights Community Plan

Goal 5 Beautify commercial areas and highways. Land Use policy 7.b is to encourage the beautification of new and existing commercial areas. Where practical, adhere to the following guidelines:	
	.
Policy	Analysis of Consistency
b. Provide a minimum of ten feet of landscaping along the street frontage of commercial uses. This shall include plants, landscaped berms, or a combination of these, capable of providing screening up to a height of 42 feet.	Consistent: The Project would provide a 15-foot landscaped setback along the Gale Avenue frontage. Landscaping will include trees, shrubs, and groundcover.
c. Landscape a minimum of five percent of parking areas.	Consistent: The Project would provide five percent landscaping on the Parcel 1 (Commercial Center) surface parking area; 5.1 percent landscaping in the Parcel 2 (Hotel A) surface parking area; and 14.6 percent landscaping in Parcel 3 (Hotel B) surface parking area.
d. Freestanding portable signs are prohibited.	Consistent: No free standing portable signs are proposed or would be permitted under the Development Program.
e. Limit signs to one for each street frontage of a shopping center listing all businesses. The sign should reflect the architectural style of the center.	Consistent. The name of the Commercial Center and tenant businesses would be provided on a single 20-foot-high sign.
g. All business in a center (three establishments or more) should present a general harmony of facades. Conditional use permits will be required of new commercial centers to insure that these concerns are addressed.	Consistent. The Commercial Center would have a unified design that would allow for a harmony of building facades. In addition, the name of the Commercial Center and tenant businesses would be provided on a single 20-foot-high sign.

Source: PCR Services Corporation, 2015.

(v) City of Industry General Plan

The northernmost portion of the Project Site, a 50-foot-wide strip totaling 0.79 acres and representing a vacated segment of Railroad Street south of the UPRR/MetroLink tracks, is located entirely within the City of Industry. Although no buildings would be developed on this parcel in the City of Industry, the existing partially channelized storm drain would be located underground. The ground level would be raised, and retaining walls would be installed to accommodate the differential between this parcel and adjacent properties. This parcel would be used for 75 parking spaces. A dense hedge of Brisbane box trees and poplars would be planted along the boundary to block views of the parking area and to soften the appearance of the retaining walls. **Table 4.A-5, Comparison of the Project to the Applicable Aesthetic Policies of the City of Industry General Plan** compares the Project to policies of the General Plan. As discussed, the uniform masonry retaining walls and densely landscaped border would provide a high-quality, professional appearance. Because the Project would be consistent with applicable aesthetic requirements of the City of Industry General Plan, aesthetic impacts would be less than significant.

(vi) City of Industry Municipal Code

The City of Industry Municipal Code (CIMC) identifies land use categories, development standards, and other general provisions that ensure consistency between the City's General Plan and proposed development projects. Provisions from the CIMC are intended to minimize visual and light and glare impacts associated with new development projects and are applicable to the Project. Applicable aesthetic policies of the CIMC are compared to the Project in **Table 4.A-6, Comparison of the Project to Applicable Aesthetic Policies of the City of Industry Municipal Code**. As shown in Table 4.A-6, the Project would comply with CIMC requirements for the provision of a Development Plan for the parking lot site, fill, and retaining walls.

The Project would meet landscaping requirements and other requirements related to the masonry retaining walls. Because the Project would be consistent with applicable aesthetic requirements of the CIMC, aesthetic impacts would be less than significant.

Table 4.A-5

**Comparison of the Project to Applicable Aesthetic Policies
of the City of Industry General Plan**

Policy	Analysis of Consistency
LU 5-2. Design new and, when necessary, retrofit existing streets and public rights-of-way to maintain a high quality, professional appearance	Consistent: The existing partially channelized storm drain in the portion of the Site in the City of Industry would be replaced and the finished grade in this area would be elevated an average of five feet above the average grade. A masonry retaining wall would be constructed along the northern property boundary and portions of the northeastern and northwestern property boundaries to retain fill soil and accommodate the finished grade elevation differential between the Project Site and adjacent off-site properties. Seventy-five parking spaces would be located within the fill area. Pursuant to the proposed landscape site plan, the boundary along the retaining wall would be planted with Brisbane box trees and poplars to form a solid hedge of vegetation. The landscaping would soften the edge of the retaining wall and screen the proposed parking area from the railroad tracks and Railroad Street. The uniform masonry retaining wall and dense tree and shrub landscaping would provide a high-quality, professional appearance.
LU5-3. Prohibit outside storage and mechanical equipment that is visible from the street	Consistent: A dense landscaped border, which would block views of surface parking from the north, would be installed along the north property line. No storage or mechanical equipment would be visible from Railroad Street in the City of Industry.
LU5-4. Maintain a professional appearance on private lands through application of standards that address landscape, building, and signage treatments.	Consistent: The installation of a dense landscaped border, uniform masonry retaining walls, and paved parking lot within the northern portion of the Project Site in the City of Industry would create a professional appearance at the north edge of the property. Professional landscaping would comprise approximately 25 percent (8,712 square feet) of the total 0.79-acre (approximately 34,412 square feet) parcel.
RM3-4. Require property owners to establish and maintain private landscaped areas as directed in the municipal code.	Consistent. Landscaping in the proposed parking area would be maintained through an agreement between the Project owners and the City of Industry.
RM3-5. Continue the City's street planting and tree maintenance	Consistent. The Project Site would have no street frontage in the City of Industry. However, the north boundary, which faces the railroad tracks and Railroad Street, would be planted with a dense row of Brisbane box trees and poplars.

Source: PCR Services Corporation, 2015.

Table 4.A-6

**Comparison of the Project to Applicable Aesthetic Policies
of the City of Industry Municipal Code**

Policy	Analysis of Consistency
<p>Section 17.36.020. (Development Plan Review Required). No person shall construct any building or structure, or relocate, rebuild, alter, enlarge, or modify any existing building or structure until development plans therefore have been reviewed and approved in accordance with this chapter, and no building permit for any such activity shall be issued until such development plans have been reviewed and approved in accordance with this chapter, and the building permit is based upon building plans which are in substantial compliance with the approved development plans</p>	<p>Consistent: Construction of retaining walls and filling of the north portion of the Project Site (which would be needed to balance the Site’s overall topography) and development of a 75-space, paved parking lot in this area would be within the jurisdiction of the City of Industry. A Development Plan for this area would be submitted to the City for review.</p>
<p>Section 17.36.060.J. Boundary and other walls should generally be of decorative masonry and/or wrought iron which is complementary in color, texture and material to the development as a whole, although it is recognized that these materials may not be appropriate in all situations.</p>	<p>Consistent. The proposed retaining walls would be of masonry construction. The north-facing retaining wall would be oriented to the railroad tracks and would be similar in character to the solid masonry walls of nearby warehouses and other industrial uses facing the tracks and Railroad Avenue. The west-facing retaining wall at the northwest corner of the Project Site would face an industrial park with adjacent large concrete buildings and the east-facing retaining wall at the northeast corner of the Project Site would face the back wall and loading docks of the Rowland Heights Plaza. Because plain masonry retaining walls would not be out of character with adjacent uses, decorative walls may not be required. However, the Project would provide trees and shrubs along the property line that would soften the visual aspect of the retaining walls.</p>
<p>Section 17.36.060.Q. Landscape areas may constitute a minimum of 12 percent of the total lot area of each parcel. The configuration and location of such areas must be such that they are effective in reducing, as far as possible, the monotonous appearance of buildings, structures and parking areas. A minimum of a three-foot wide landscape strip must be provided along all property lines adjacent to public roadways or areas with unobstructed public views. Where applicable, landscaping must be designed to comply with the city’s water efficient landscape regulations and with the city’s water efficient landscape guidelines.</p>	<p>Consistent. As show in Figure 4.A-6, Landscape Site Plan, the Project would provide a landscaped strip comprising Brisbane box and poplars along the length of the north boundary. Total landscaped area would be 0.2 acres, which represents approximately 25 percent of the 0.79-acre land area within the City of Industry and would exceed the City’s minimum requirement. The landscaped strip would exceed three feet in width. Landscaping would block views of the surface parking area from adjacent properties and from Railroad Street to the north. Proposed landscaping would be drought tolerant and meet the City’s water efficiency landscape guidelines.</p>

Table 4.A-6 (Continued)

**Comparison of the Project to Applicable Aesthetic Policies
of the City of Industry Municipal Code**

Policy	Analysis of Consistency
<p>Section 17.36.060.S. The design review process shall endeavor to eliminate the ugly, the garish, the inharmonious, the monotonous, and the hazardous; should endeavor to ensure that proposed improvements will not impair the desirability of investment or occupancy nearby; and should endeavor not to significantly increase costs nor jeopardize the economic viability of a project. The board, however, shall not be precluded from imposing conditions that increase costs</p>	<p>Consistent. The proposed parking lot and landscape plan, as well as plans for the proposed retaining walls, would be reviewed during the permit process. The on-site structure (the retaining walls) would not front sensitive uses in a manner that would impair the desirability of investment or occupancy of adjacent uses.</p>

Source: PCR Services Corporation, 2015.

(2) Light and Glare/Shade Shadow

Threshold AES-2: A significant impact would occur if the project created a new source of substantial light, glare, or shadows would adversely affect day or nighttime views in the area.

Impact Statement AES-2: *Reflected light and new light sources associated primarily with the Project's signage, parking lot lights, and light spillage from windows would not substantially alter the character of the area surrounding the Project Site nor result in substantial light spill and/or glare onto adjacent light-sensitive receptors. Shading from the Project would not affect any shade-sensitive uses, such as dwelling units or parks. Therefore, potential impacts associated with nighttime illumination and/or glare from reflected sunlight and shading would be less than significant.*

(a) Project Light and Glare

(i) Construction Lighting

Construction activities would occur primarily during daylight hours, and any construction-related illumination would be used for safety and security purposes only. Although night construction and the use of lighting for construction lighting are not anticipated, any lighting needed during Project construction would generate minor light spillover in the Site vicinity. Affected uses would include commercial and industrial uses to the east and west. Construction lighting also would last only as long as needed during the finite construction process. The nearest residential uses are located south of SR-60 and are screened from the freeway by eight-foot or higher sound walls. The line-of-sight between the residential neighborhood and the Project's construction site would be substantially blocked by the sound walls. Because the freeway also introduces high levels of ambient light, any artificial light associated with construction activities would not significantly impact these residential uses in a manner that would adversely affect nighttime views or substantially alter the character of the uses surrounding the construction area.

The Best Western hotel directly across from the Project Site is also considered light sensitive. However, the proximity of the Best Western hotel to SR-60, which is a substantial source of nighttime light from vehicles and pole lights, and absence of landscaping or walls between the hotel and the freeway, would increase the expectation of high levels of ambient light by hotel occupants. Therefore, artificial light impacts associated with construction would not alter the character of the area or cause a substantial new source of lighting in the area. Construction activities are not anticipated to result in flat, shiny surfaces that would reflect sunlight or cause other natural glare. Construction activities would not exceed the threshold for light and glare; as such, construction light and glare impacts would be less than significant.

(ii) Operational Lighting

Illuminated signage associated with the Project may be considered a potential source of nighttime glare or ambient lighting. Parking lot lighting, security lighting, landscaping lights, and light spillage from windows would be similar to existing commercial uses and street lighting in the area, and would not create a substantive source of new lighting that would significantly increase ambient light levels or change the character of the area. Illuminated signs proposed for the Project include hotel identification signs on the hotels' facades, business signs for retail and other commercial uses within the Commercial Center, and a potential free-standing sign naming the Commercial Center. The latter would be oriented toward Gale Avenue and may potentially be visible from SR-60 (unless blocked by the Best Western hotel). The hotel signs would be in closer proximity to SR-60 than the Commercial Center and would be visible from the freeway.

Light-sensitive land uses in the area include residential uses south of SR-60. The Best Western hotel directly south of the Project Site is also considered light sensitive. The Project would be visible from the Best Western hotel, SR-60, and adjacent roadways, including Gale Avenue and Nogales Street. However, the proximity of the Best Western hotel to SR-60, which is a substantial source of nighttime light from vehicles and pole lights, and absence of landscaping or walls between the hotel and the freeway, would increase the expectation of high levels of ambient light and glare by hotel occupants. Views of the Project Site from residential uses south of SR-60 would be blocked by sound walls and landscaping along the freeway right-of-way.

Although the hotel signs would be visible from the adjacent freeway and roadways, no point sources of light representing a great contrast from surrounding ambient light conditions would be directed toward the freeway or adjacent streets. The Project's signs would also not be out of character with the surrounding area, in which several illuminated signs, pole signs, and billboards currently exist. As described in Subsection 2, Environmental Setting, above, several illuminated signs, including freestanding pole signs for the Best Western hotel, various restaurants, and motels in the area; pylon signs for the Mandarin Plaza and Rowland Heights Plaza; and billboards for the 99 Ranch Market and Diamond Family Spa are located along the Pomona Freeway frontage or near the Gale Avenue/Nogales Street intersection. The array of illuminated signs in the area contributes to a bright and vibrant environment; therefore the Project wall signs would not create a significant contrast.

The potential for undue light contrast and glare as a road hazard is addressed by the LACC Section 6502.7, which prohibits any sign that would interfere with, mislead, or confuse traffic. Since this criterion would apply to Project signage, the Sign Program would be evaluated by the Los Angeles Regional Planning

Department and, if deemed necessary, by the California Department of Transportation (Caltrans) to ensure that potential glare impacts on passing motorists would not occur.

Project signs would not change ambient illumination levels in the area due to the already high ambient light conditions and large number of existing point sources. The intensity of light emanating from the signs would also be regulated by the Rowland Heights CSD, which requires a sign program to be submitted for approval by the Director of Planning. In view of the ambient light levels and the currently highly-lit character of the area, the proposed signs would not be out of character with the surrounding area. Therefore, light and glare impacts associated with Project signs, parking areas, security lighting, landscape lighting, and light spillage from windows would be less than significant.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Sun glare occurs when the sun is behind the viewer and reflected back. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic or glass curtain walls and trim. The proposed buildings would be visible from eastbound and westbound Gale Avenue and SR-60. The size and height of the two hotel buildings (80 feet maximum height) could potentially create a daytime glare source. However, the intensity of glare and reflectivity from any structure would depend on the types of building materials, articulation of design, and the orientation of the buildings in relation to the direction of the sun and viewer.

The exterior facades of the hotel buildings would consist of a variety of materials. Primary exterior building materials include stone cladding, painted cement plaster, solar-blue Pacifica glazing (upper stories), and laminated metal panels. Areas of glass are limited and intermixed with natural building materials. Windows in the hotels would be primarily linear, alternating with a columnar treatment to create an articulated feature, somewhat recessed and unlikely to cause any kind of glare impact due to light reflection. Reflectivity would be further reduced through the use of articulation and setback of exterior walls, as shown in building elevations (see previous Figures 4.A-11 and 4.A-12). As such, any reflected light from the Project would not interfere with the operation of motor vehicles on adjacent roadways or substantially alter the character of existing views. The Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, light and glare and impacts attributable to Project would be less than significant.

(b) Project Shade/Shadow

The Project would introduce two six-story buildings and four two-story buildings on the Project Site. The maximum height of the six-story buildings would be 80 feet. To determine the extent of the shading from these buildings, shading diagrams were prepared to indicate the shading patterns that would occur during the times that shadow-sensitive uses would be shaded more than three hours between 9:00 A.M. and 3:00 P.M. PST (between early November and mid-March), or for more than four hours between 9:00 A.M. and 5:00 P.M. PDT (between mid-March and early November). Uses that would be sensitive to shading impacts include outdoor areas associated with single and multifamily residences, schools, parks, pedestrian plazas, outdoor dining areas, golf courses, swimming pools and recreation areas, and solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce.

Shading diagrams are presented in **Figures 4.A-14** through **4.A-17** for Winter and Summer solstices and Spring and Fall equinoxes. Shadows for all other times of the year can be interpolated between these four seasons and would not exceed the shadows identified as occurring at these four points in time. Shadow lengths based on the Project's building heights are identified for specific times of the day and vary according to the season. In the Project area, the nearest sensitive receptor sites include the swimming pool and deck for the Best Western hotel to the south, just across Gale Avenue, and the residential neighborhood also to the south, south of SR-60.

(i) Winter Solstice

Figure 4.A-14, Winter Solstice Shadows – December 21 illustrates the shading pattern that would occur during the winter solstice, which is when the longest shadows of the year are cast at this latitude. The diagram, which reflects the Project buildings' heights and massing, depicts shadows that would be cast by the six-story hotels and one- and two-story commercial buildings. As shown in Figure 4.A-14, the Project would not east elevation of the northernmost building and a portion of the east elevation of the southernmost building in The Concourse Business Park between 9:00 A.M. and 11:00 A.M. A section of the business park's surface parking lot would be shaded for approximately one hour after 9:00 A.M. By 11:00 A.M., western shadows would be well contained within the Project Site boundary.

The Project's hotels and commercial buildings would not shade any off-site uses to the east or south during morning or afternoon hours.

Because new shading would not occur for more than three consecutive hours at a single off-site location between 9:00 A.M. and 3:00 P.M. PST and no shade-sensitive uses would experience any new shading from the Project, shading would not substantially adversely affect surrounding uses in the area. Accordingly, Project shade/shadow impacts would be less than significant during the winter solstice.

(ii) Spring Equinox

Figure 4.A-15, Spring Equinox Shadows – March 21 illustrates future shade conditions during the spring equinox. As shown in Figure 4.A-15, the Project would not shade any residential or recreational sensitive areas. Shading from the hotel buildings would reach the east elevation of the northernmost industrial building and the northeast and southeast corners of the southernmost building in The Concourse Business Park to the west between 9:00 A.M. and 11:00 A.M. By 11:00 A.M., western shadows would be well contained within the Project Site boundary. A section of the business center's surface parking lot would be shaded for approximately one hour after 9:00 A.M.

The hotels and commercial buildings would not shade any off-site uses to the north or south during morning or afternoon hours. Because new shading would not occur for more than four consecutive hours between 9:00 A.M. and 5:00 P.M. PST and no off-site shade-sensitive uses would experience any new shading from the Project, the Project would not substantially adversely affect surrounding uses. Shade/shadow impacts would be less than significant during the spring equinox.

(iii) Summer Solstice

Figure 4.A-16, Summer Solstice Shadows – June 21 illustrates future shadow conditions during the summer solstice. As shown in Figure 4.A-16, the Project would not shade any off-site shade-sensitive areas. Minimal

off-site shading of The Concourse Business Park property to the west would occur at approximately 9:00 A.M. for less than one hour. Minimal off-site shading to the east from the Project's two-story commercial buildings would also cross the east property line for a short period before 5:00 P.M. No new shading would occur north or south of the Project Site. Because new shading would not affect any shade-sensitive sites and shading would not occur for more than four consecutive hours between 9:00 A.M. and 5:00 P.M. PDT, shading would not substantially adversely affect surrounding uses in the area. Shade/shadow impacts would be less than significant during the summer solstice.

(iv) Fall Equinox

Figure 4.A-17, Fall Equinox Shadows – September 21 illustrates future shade conditions during the fall equinox. As shown in Figure 4.A-17, the Project would not shade any off-site sensitive areas. As with the spring equinox, shading would reach the east elevation of the northernmost building and the northeast and southeast corners of the southernmost building in The Concourse Business Park during the hours of 9:00 A.M. and 11:00 A.M. By 11:00 A.M., Project shadows would be well contained within the Project Site boundary. The hotels and commercial buildings would not shade any off-site uses to the north or south during morning or afternoon hours. Because new shading would not affect any shade-sensitive sites for more four consecutive hours between 9:00 A.M. and 5:00 P.M. PDT, the Project would not substantially adversely affect surrounding uses in the area. Impacts would be less than significant impact during the fall equinox.

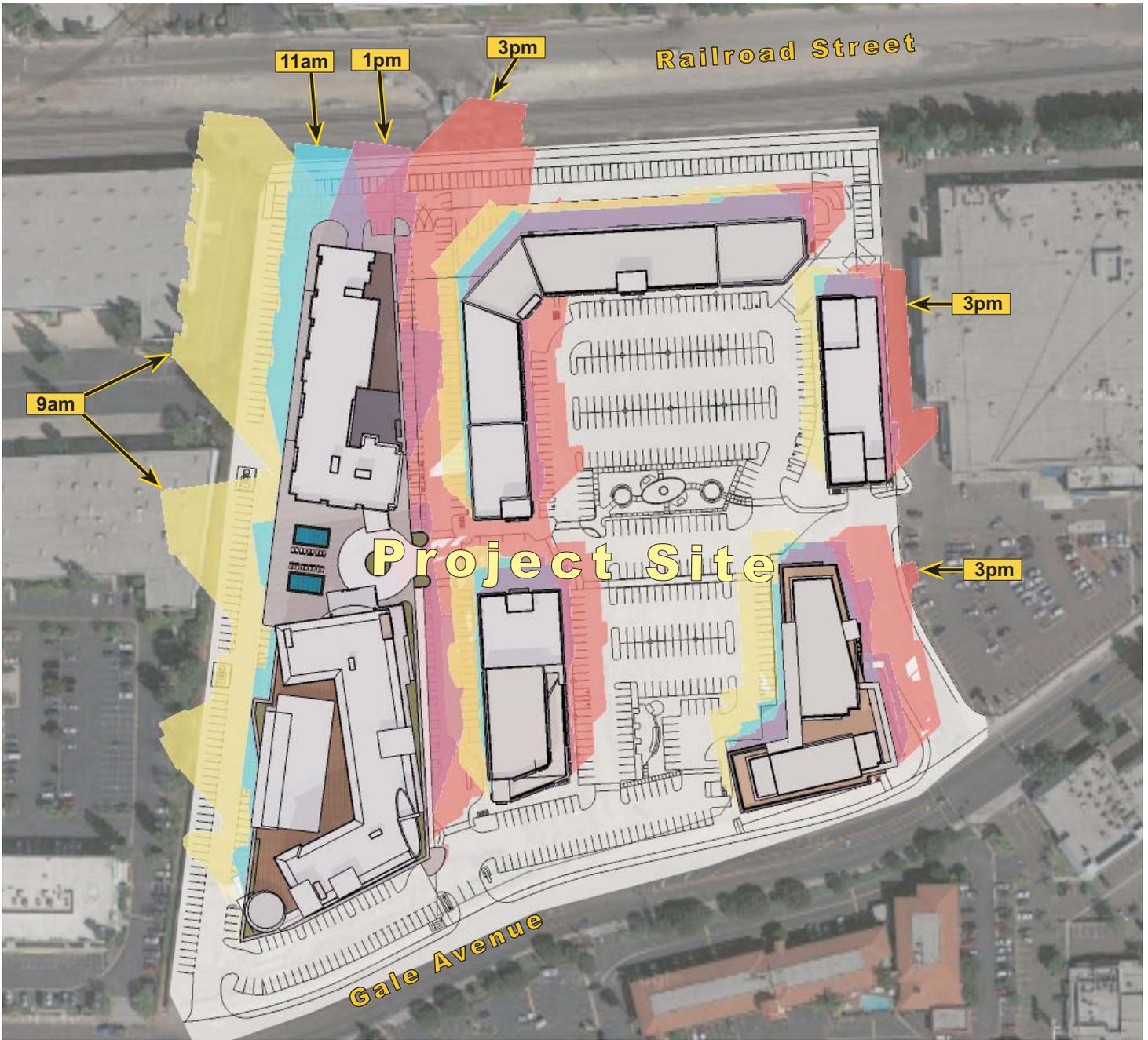
e. Cumulative Impacts

Chapter 3.0, General Description of Environmental Setting, of this Draft EIR provides a list of projects that are planned or are under construction in the Project area. These projects are summarized in **Table 3-1, Related Projects List**, and mapped in **Figure 3-1, Related Projects Map**, in Chapter 3.0. Three related projects are located in the Project vicinity, as follows:

- Restaurant southwest of the intersection of Colima Road and Nogales Street, approximately 0.6 mile to the southeast of the Project Site
- Specialty restaurant, medical/dental office, and specialty retail north of Colima Road, approximately 0.75 mile to the southwest of the Project Site
- Restaurant southeast of the interchange between the Pomona Freeway and Fullerton Road, approximately 0.77 mile to the west of the Project Site

(1) Project Construction

The relative small size of the related projects indicates that construction would occur over a short period of time. In addition, none of the related projects are along the same roadway as the Project or north of SR-60, so there would be limited disruption of change in character of the area associated with construction. Also, the distance between the related projects indicates that the visual effects of construction would not be within a common line-of-sight by residents or other sensitive viewers. No combination of related projects' construction sites would be visible from a stationary point. Also, because of the distance between the Project Site and the related projects' construction sites, any minor lighting needed for construction, would not be cumulative. Therefore, cumulative impacts related to visual character and lighting would be less than significant.

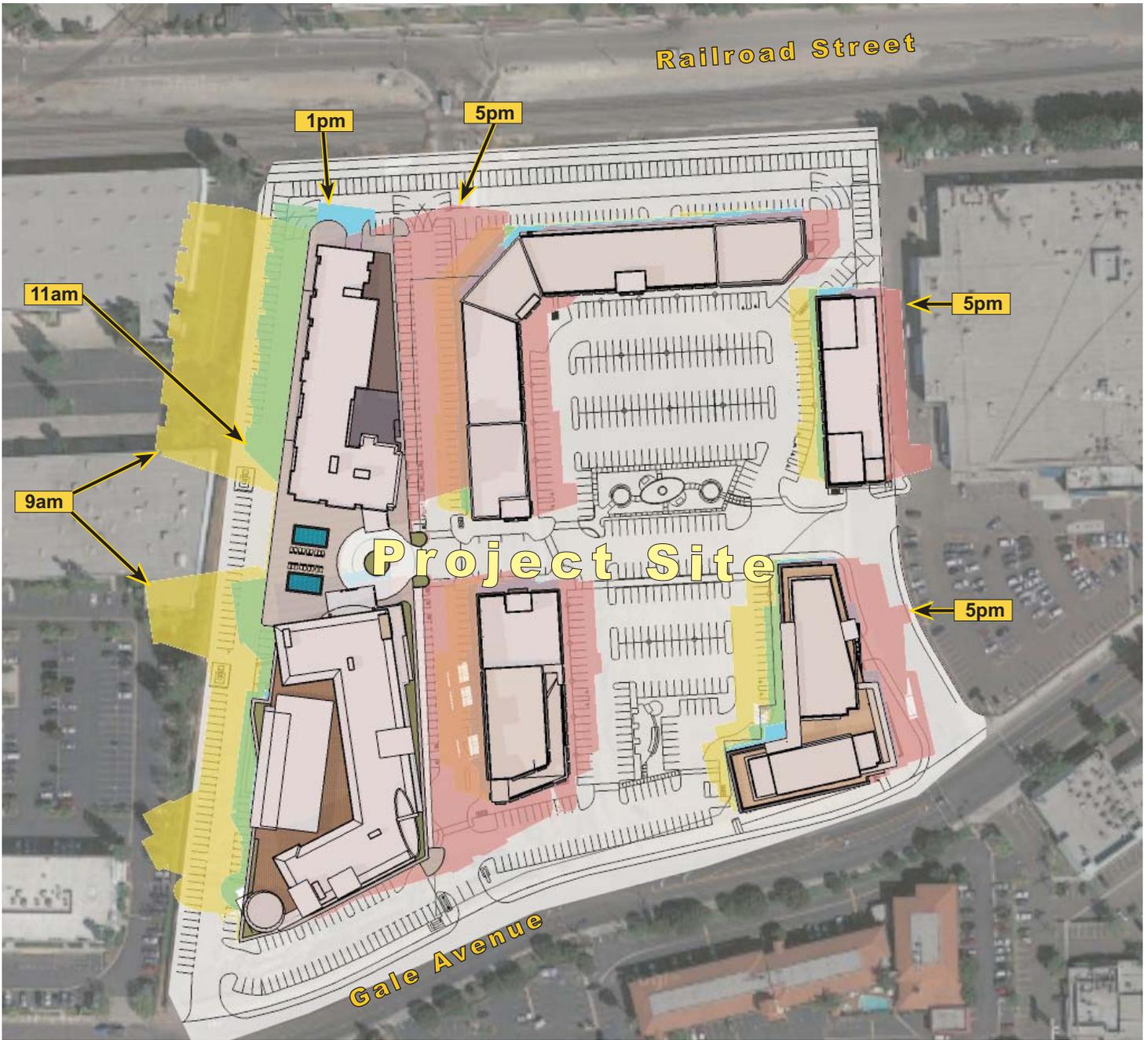


 Sensitive Receptors (None)

NOTE:
CEQA Thresholds Guide Standard:

A significant impact would occur if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between early November and early March).

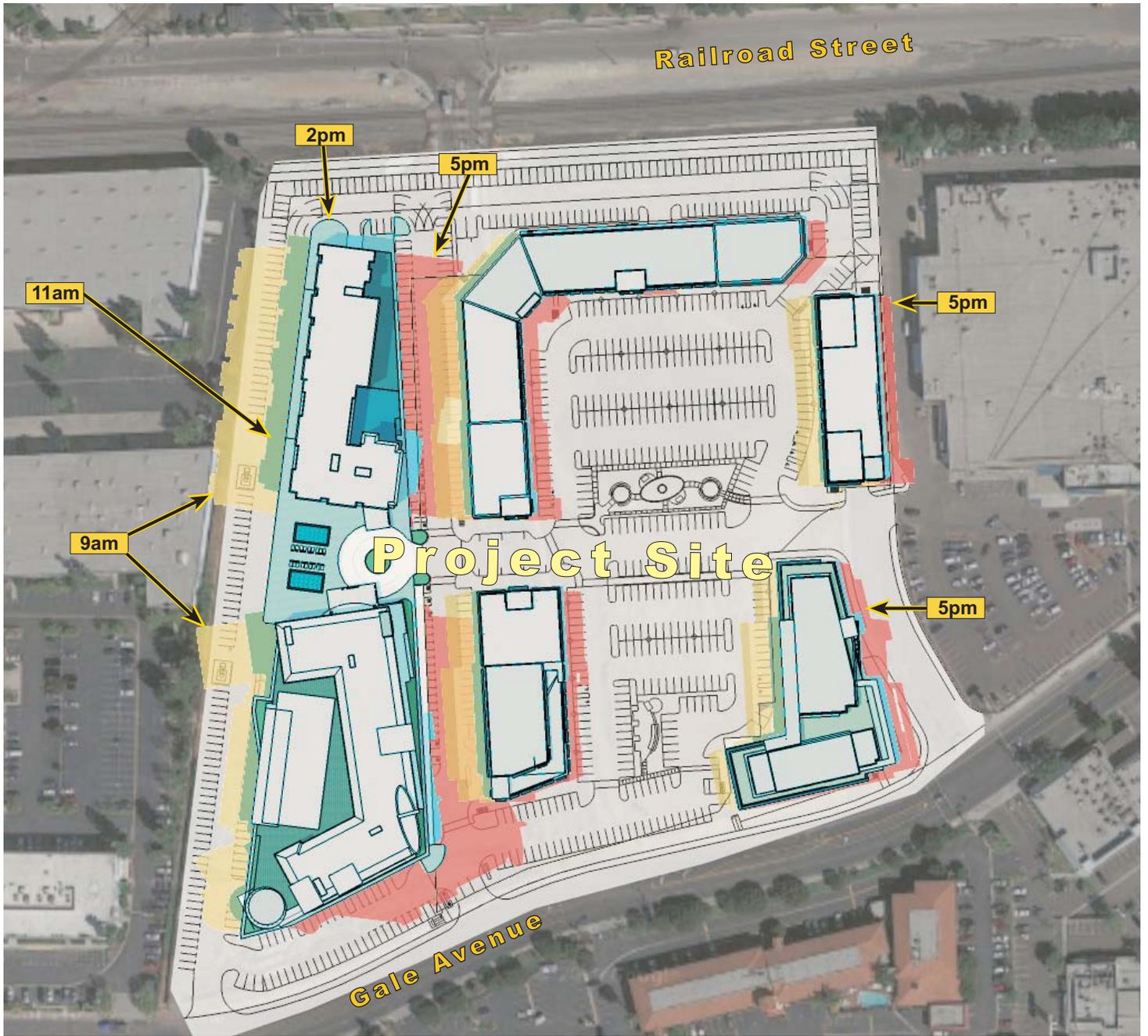




 Sensitive Receptors (None)

NOTE:
CEQA Thresholds Guide Standard:

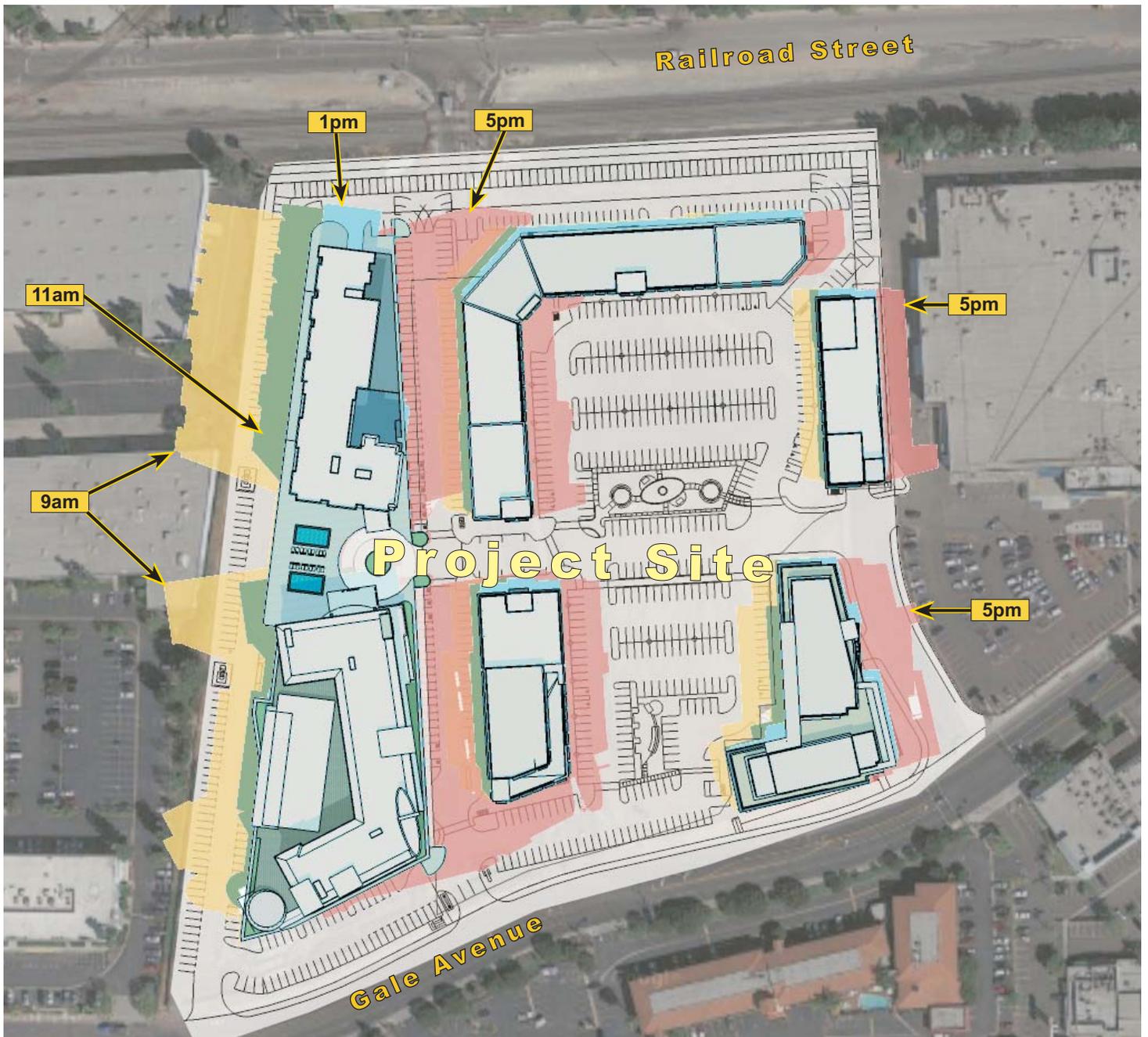
A significant impact would occur if shadow-sensitive uses would be shaded by project-related structures for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Saving Time (between early March and early November).



 Sensitive Receptors (None)

NOTE:
CEQA Thresholds Guide Standard:

A significant impact would occur if shadow-sensitive uses would be shaded by project-related structures for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Saving Time (between early March and early November).



 Sensitive Receptors (None)

NOTE:
CEQA Thresholds Guide Standard:

A significant impact would occur if shadow-sensitive uses would be shaded by project-related structures for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Saving Time (between early March and early November).



(2) Project Operations

The relative small size and dispersed nature of the related projects, and the existing developed character of the SR-60 corridor, indicate a minor effect relative to the visual character of the area. The proposed related projects (three restaurants and some office and retail space) would be consistent with existing low-rise development in their respective neighborhoods and would not contribute to or change the predominant visual character of the area from low-rise to high-rise. The relative distance of the related projects from the Project and common location of the related projects to the south of the SR-60 indicates that viewers would not likely see all of the new development and the Project in one driving period. No combination of the related projects would be visible from a stationary vantage point.

Illuminated signage associated with related projects would be similar to restaurant and other commercial signs that are visible and common along SR-60. Because of existing signage and relative high ambient light along the SR-60 corridor, the related projects combined with the Project would not cause a noticeable increase in ambient lighting. Because none of the related projects are high-rise and are located at a distance from the Project Site, no cumulative shade impacts are anticipated. The related projects would be consistent with commercial development in their proximities and, in combination with the Project, would not substantially degrade the visual character of the area as a result of height, bulk, pattern, scale, character, or other features. Cumulative impacts related to visual character, light and glare, and shade/shadow would, therefore, be less than significant.

4. MITIGATION MEASURES

The Project would have less than significant impacts on aesthetics. No mitigation measures are required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant impacts with respect to aesthetic character, light and glare, and shading are anticipated, and no mitigation would be required.

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4.B AIR QUALITY

1. INTRODUCTION

This section addresses potential effects on air quality associated with air emissions that could result from the Project. The analysis also addresses the consistency of the Project with applicable air quality policies. Calculation worksheets, assumptions, and model outputs used in the analysis are contained in Appendix B of this Draft EIR.

2. ENVIRONMENTAL SETTING

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the United States Environmental Protection Agency (USEPA) and are subject to emissions control requirements adopted by federal, State, and local regulatory agencies.

Ozone (O₃): Ozone is a secondary pollutant formed by the chemical reaction of volatile organic compounds and nitrogen oxides (NO_x) under favorable meteorological conditions such as high temperature and stagnation episodes. An elevated level of ozone irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower the lung efficiency.

Volatile Organic Compounds (VOCs): These are compounds comprised primarily of atoms of hydrogen and carbon. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons, as are architectural coatings. Emissions of VOCs themselves are not “criteria” pollutants; however, they contribute to formation of O₃ and are regulated as O₃ precursor emissions.

Nitrogen Dioxide (NO₂): Nitrogen dioxide is a reddish-brown, reactive gas that is formed in the ambient air through the oxidation of nitric oxide (NO). The principle form of NO₂ produced by combustion is NO, but NO reacts quickly to form NO₂, creating the mixture of NO and NO₂ referred to as nitrogen oxides (NO_x). Major sources of NO_x include power plants, large industrial facilities, and motor vehicles. Emissions of NO_x can potentially irritate the nose and throat and may increase susceptibility to respiratory infections, especially in people with asthma. According to the California Air Resources Board (CARB), “NO₂ is an oxidizing gas capable of damaging cells lining the respiratory tract. Exposure to NO₂ along with other traffic-related pollutants, is associated with respiratory symptoms, episodes of respiratory illness and impaired lung functioning. Studies in animals have reported biochemical, structural, and cellular changes in the lung when exposed to NO₂ above the level of the current State air quality standard. Clinical studies of human subjects

suggest that NO₂ exposure to levels near the current standard may worsen the effect of allergens in allergic asthmatics, especially in children.”¹

Carbon Monoxide (CO): Carbon monoxide is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Sulfur Dioxide (SO₂): Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. Sulfur dioxide potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Particulate Matter (PM₁₀ and PM_{2.5}): The human body naturally prevents the entry of larger particles into the body. However, small particles including fugitive dust, with an aerodynamic diameter equal to or less than ten microns (PM₁₀) and even smaller particles with a aerodynamic diameter equal to or less than 2.5 microns (PM_{2.5}), can enter the body and are trapped in the nose, throat, and upper respiratory tract. These small particulates could potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM₁₀ and PM_{2.5}. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates could become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Lead (Pb): Lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting or processing the metal is the primary source of lead emissions, which is primarily a regional pollutant. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

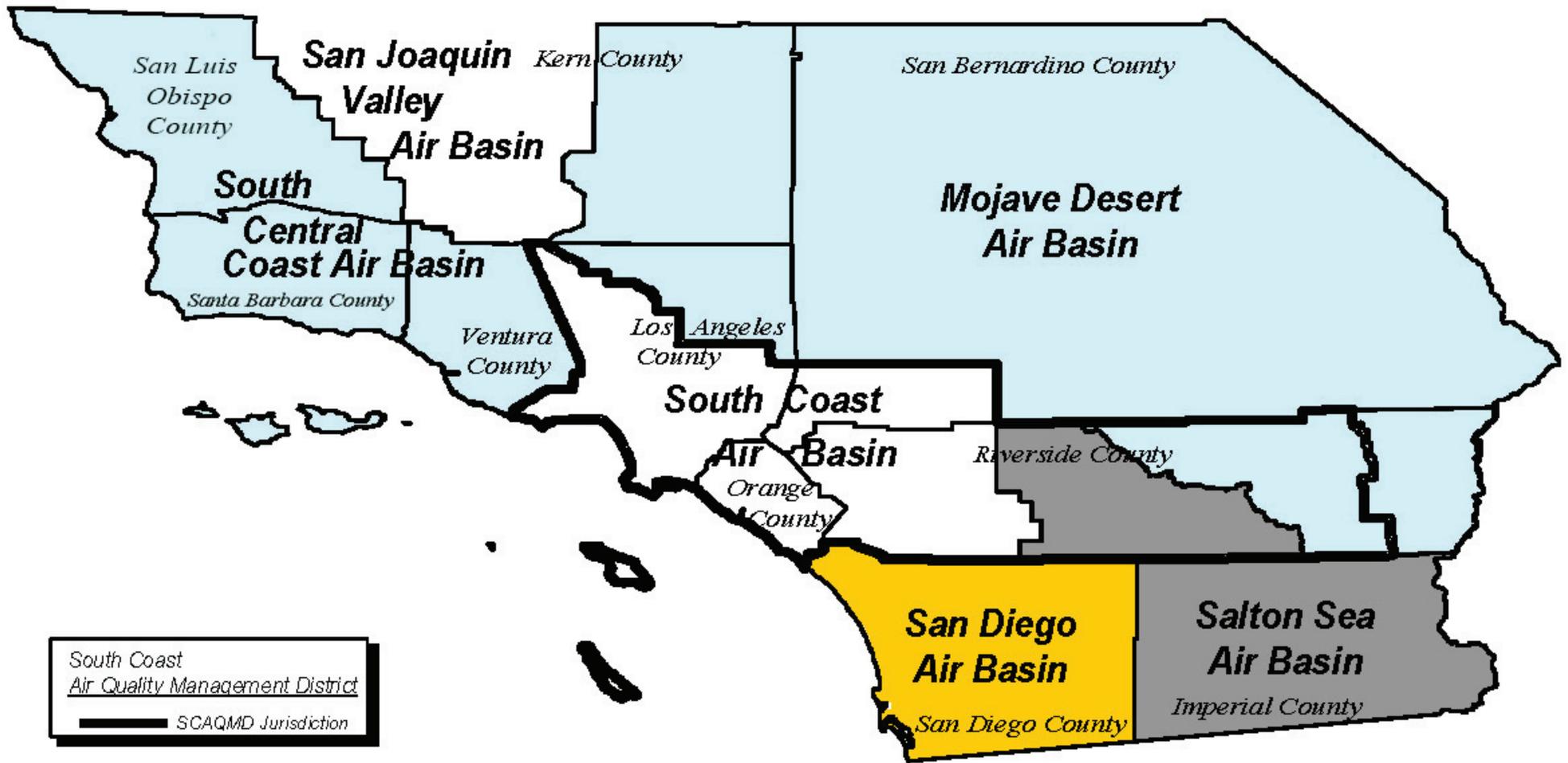
a. Existing Conditions

(1) Regional Conditions

(a) Criteria Pollutants

The Project Site is located within the South Coast Air Basin (Air Basin), which is shown in **Figure 4.B-1, Boundaries of the South Coast Air Quality Management District and Federal Planning Areas**. The Air Basin is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Air Basin consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western non-desert portions of San

¹ California Air Resources Board, "Nitrogen Dioxide – Overview," July 21, 2011, <http://www.arb.ca.gov/research/aaqs/caaqs/no2-1/no2-1.htm>. Accessed March 2015.



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Bernardino and Riverside counties, in addition to the San Geronio Pass area in Riverside County. The terrain and geographical location determine the distinctive climate of the Air Basin, as it is a coastal plain with connecting broad valleys and low hills.

The Air Basin lies in the semi-permanent high-pressure zone of the eastern Pacific Ocean. The usually mild climatological pattern is interrupted by periods of hot weather, winter storms, or Santa Ana winds. The extent and severity of pollutant concentrations in the Air Basin is a function of the area's natural physical characteristics (weather and topography) and man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential. The Air Basin's meteorological conditions, in combination with regional topography, are conducive to the formation and retention of O₃, which is a secondary pollutant that forms through photochemical reactions in the atmosphere. Thus, the greatest air pollution impacts throughout the Air Basin typically occur from June through September. This condition is generally attributed to the emissions occurring in the Air Basin, light winds, and shallow vertical atmospheric mixing. These factors reduce the potential for pollutant dispersion causing elevated air pollutant levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. Concentrations of O₃, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert.

(b) Air Toxics

In addition to criteria pollutants, the South Coast Air Quality Management District (SCAQMD) periodically assesses levels of toxic air contaminants (TACs) in the Air Basin. A TAC is defined by California Health and Safety Code Section 39655:

"Toxic air contaminant" means an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412(b)) is a toxic air contaminant.

July 2012 and June 2013, the SCAQMD conducted the Multiple Air Toxics Exposure Study (MATES IV), which is a follow-up to previous air toxics studies conducted in the Air Basin. The MATES IV Final Report was issued in October 2014. The study, based on actual monitored data throughout the Air Basin, consisted of several elements. The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Air Basin equates to a background cancer risk of approximately 418 in 1,000,000 primarily due to diesel exhaust, which is about 65 percent lower than the previous MATES III cancer risk.² Generally, the risk from air toxics is lower near the coastline: it increases inland, with higher risks concentrated near large diesel sources (e.g., freeways, airports, and ports). The California Environmental Protection Agency Office of Environmental Health Hazard Assessment (OEHHA) has recently updated the methods for estimating cancer risks.³ The new method utilizes higher estimates of cancer

² South Coast Air Quality Management District, Draft Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, 2014, page ES-2.

³ California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Risk Assessment Guidelines – The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, March 2015.

potency during early life exposures and uses different assumptions for breathing rates and length of residential exposures. When combined together, SCAQMD staff estimates that risks for the same inhalation exposure level will be about 2.7 times higher using the proposed updated methods.⁴ This would be reflected in the average lifetime air toxics risk estimated from the monitoring sites data going from 418 per million to an 1128 per million, with approximately 68 percent of the risk attributed to diesel particulate emissions.⁵ The study also found lower ambient concentrations of most of the measured air toxics compared to the levels measured in the previous study conducted during 2004 and 2006. Specifically, benzene and 1,3-butadiene, pollutants generated mainly from vehicles, were down 35 percent and 11 percent, respectively.⁶ The reductions were attributed to air quality control regulations and improved emission control technologies. In addition to air toxics, MATES IV included continuous measurements of black carbon and ultrafine particles (particles smaller than 0.1 microns in size), which are emitted by combustion of diesel fuels. Sampling sites located near heavily trafficked freeways or near industrial areas were characterized by increased levels of black carbon and ultrafine particles compared to more rural sites.

As part of the MATES IV, the SCAQMD prepared maps that show regional trends in estimated outdoor inhalation cancer risk from toxic emissions, as part of an ongoing effort to provide insight into relative risks. The maps represent the estimated number of potential cancers per million people associated with a lifetime of breathing air toxics (24 hours per day outdoors for 70 years). The Project Site spans across portions of two MATES IV grid spaces. The grids in which the Project Site is located are shown in **Figure 4.B-2, Background Inhalation Cancer Risk for Project Site Area**. As shown, the potential cancers per million people for the two grids are estimated at 421 to 493 per million (the majority of the Project Site is in the grid with a risk of 421 per million).⁷

(2) Local Conditions

(a) Existing Pollutants Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations. The monitoring station most representative of the Project Site is the Pomona Monitoring Station. Criteria pollutants monitored at this station include O₃, NO₂, and CO. The next most representative station is the Azusa Monitoring Station. Criteria pollutants monitored at this station include PM₁₀ and PM_{2.5}. The nearest representative station for lead is the Pico Rivera Monitoring Station. The closest SO₂ representative station is the Rubidoux/Mission Boulevard Monitoring Station. The most recent data available from the SCAQMD for these monitoring stations are from years 2009 to 2013.⁸ The pollutant concentration data for these years are summarized in **Table 4.B-1, Ambient Air Quality Data**.

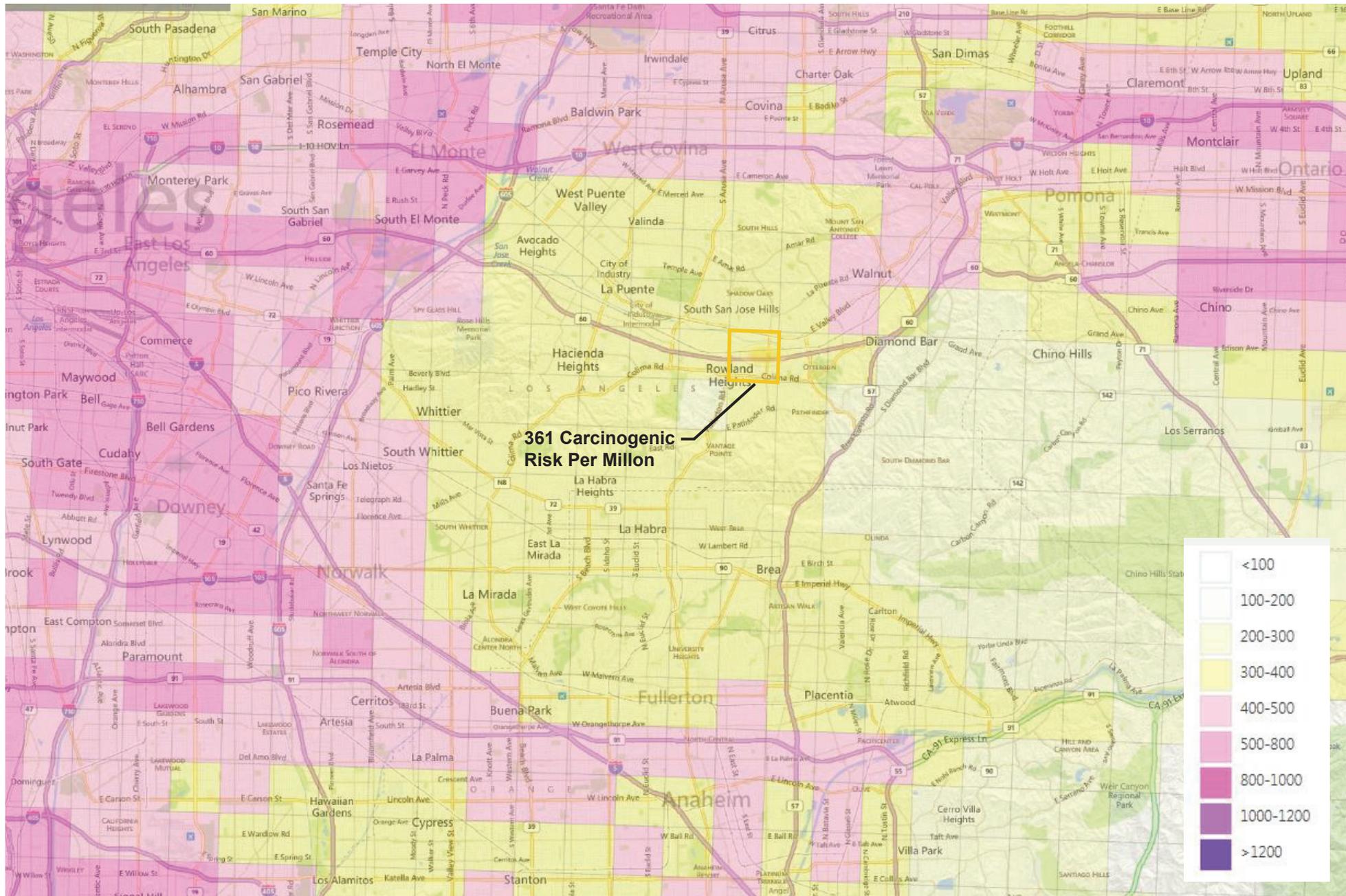
⁴ South Coast Air Quality Management District, *Agenda No. 8b, Potential Impacts of New OEHHA Risk Guidelines on SCAQMD Programs*, <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2014/may-specsess-8b.pdf?sfvrsn=4>. Accessed March 2015.

⁵ South Coast Air Quality Management District, *Draft Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, 2014, page ES-2*.

⁶ South Coast Air Quality Management District, *Draft Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, 2014 6-1*.

⁷ South Coast Air Quality Management District, *Multiple Air Toxics Exposure Study, MATES IV Carcinogenic Risk Interactive Map*, <http://www.aqmd.gov/home/library/air-quality-data-studies/health-studies/mates-iv>. Accessed March 2015.

⁸ South Coast Air Quality Management District, *Historical Data by Year*, <http://www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year>. Accessed March 2015.



Background Inhalation Cancer Risk for Project Site Area

FIGURE
4.B-2

Rowland Heights Plaza and Hotel Project
Source: South Coast Air Quality Management District, 2015.

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Table 4.B-1

Ambient Air Quality Data

Pollutant/Standard	2009	2010	2011	2012	2013
O₃ (1-hour)					
Maximum Concentration (ppm)	0.138	0.115	0.119	0.117	0.125
Days > CAAQS (0.09 ppm)	25	9	150	21	12
O₃ (8-hour)					
Maximum Concentration (ppm)	0.099	0.082	0.096	0.092	0.099
4 th High 8-hour Concentration (ppm)	0.095	0.076	0.086	0.085	0.085
Days > CAAQS (0.070 ppm)	37	20	24	28	22
Days > NAAQS (0.075 ppm)	23	40	160	15	15
NO₂ (1-hour)					
Maximum Concentration (ppm)	0.10	0.10	0.09	0.08	0.08
98 th Percentile Concentration (ppm)	0.08	0.07	0.07	0.06	0.06
Days > CAAQS (0.18 ppm)	0	0	0	0	0
NO₂ (Annual)					
Annual Arithmetic Mean (0.030 ppm)	0.0327	0.026	0.025	0.021	0.023
CO (1-hour)					
Maximum Concentration (ppm)	3	3	--	--	--
Days > CAAQS (20 ppm)	0	0	--	--	--
Days > NAAQS (35 ppm)	0	0	--	--	--
CO (8-hour)					
Maximum Concentration (ppm)	1.8	1.8	1.6	1.5	1.6
Days > CAAQS (9.0 ppm)	0	0	0	0	0
Days > NAAQS (9 ppm)	0	0	0	0	0
SO₂ (1-hour)					
Maximum Concentration (ppm)	0.01	0.02	0.051	0.004	0.008
99 th Percentile Concentration (ppm)	--	--	0.013	0.002	0.005
Days > CAAQS (0.25 ppm)	0	0	0	0	0
Days > NAAQS (0.075 ppm)	0	0	0	0	0
SO₂ (24-hour)					
Maximum Concentration (ppm)	0.003	0.005	-	-	-
Days > CAAQS (0.04 ppm)	0	0	-	-	-
Days > NAAQS (0.14 ppm)	0	0	-	-	-
PM₁₀ (24-hour)					
Maximum Concentration (µg/m ³)	74	70	065	780	076
Samples > CAAQS (50 µg/m ³)	7(13.5%)0	5(9.1%)	9(15%)	60	6(10%)
Samples > NAAQS (150 µg/m ³)	0	0	0	0	0
PM₁₀ (Annual Average)					
Annual Arithmetic Mean (20 µg/m ³)	32.0	29.8	32.7	30.3	33.0

Table 4.B-1 (Continued)

Ambient Air Quality Data

Pollutant/Standard	2009	2010	2011	2012	2013
PM_{2.5} (24-hour)					
Maximum Concentration ($\mu\text{g}/\text{m}^3$)	72.1	44.4	49.5	39.6	29.6
98 th Percentile Concentration ($\mu\text{g}/\text{m}^3$)	42.9	35.4	26.9	25.6	26.4
Samples > NAAQS (35 $\mu\text{g}/\text{m}^3$)	6(3.9)	1(1.1%)	1(0.8%)	1	0
PM_{2.5} (Annual)					
Annual Arithmetic Mean (12 $\mu\text{g}/\text{m}^3$)	12.8	10.9	11.4	11.0	10.5
Lead					
Maximum 30-day average ($\mu\text{g}/\text{m}^3$)	0.04	0.02	0.01	0.01	0.01
Samples > CAAQS (1.5 $\mu\text{g}/\text{m}^3$)	0.02	0.01	0.01	0.01	0.01

Notes: ppm = parts per million; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter

Sources: South Coast Air Quality Management District, *Historical Data by Year*, <http://www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year>. Accessed July 2015; California Air Resources Board, *Air Quality Data Statistics*, <http://www.arb.ca.gov/adam/>. Accessed July 2015; U.S. Environmental Protection Agency, *AirData*, http://www.epa.gov/airdata/ad_rep_mon.html. Accessed July 2015.

(b) Sensitive Receptors and Locations

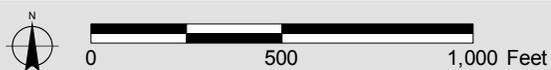
Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others. Sensitive land uses within 500 feet of the Project Site are shown in **Figure 4.B-3, Sensitive Receptor Locations Nearest to the Project Site**, and include the following:

- Single-Family Residential Areas: Located south of the Pomona Freeway (SR-60) are the Rowland Heights Mobile Estates mobile home park and primarily single-family residential neighborhoods, all accessed from Colima Road.

A Best Western Plus Executive Inn hotel is located south of the Project Site across East Gale Avenue, approximately 90 feet from the Project Site. Guests staying at this hotel are not expected to reside at this location for extended durations. Therefore, this land use is not considered a sensitive receptor for purposes of analysis of air quality impacts.

(c) Existing Site Emissions

The Project Site is currently a mostly undeveloped 13-acre property which generates no appreciable man-made emissions. Although wind-blown dust may emanate from the Project Site, it is considered negligible.



Sensitive Receptor Locations Nearest to the Project Site

Rowland Heights Plaza and Hotel Project
Source: Google Maps, 2015 (Aerial); PCR Services Corporation, 2015.

FIGURE

4.B-3

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Through traffic and commercial parking currently accessing the site due to the ACE construction are not considered relevant existing emissions. Thus, all development for the Project will be considered new emissions.

b. Regulatory Framework Summary

A number of statutes, regulations, plans, and policies have been adopted that address air quality issues. The Project is subject to air quality regulations developed and implemented at the federal, State, and local levels. This section provides a summary of pertinent air quality regulations affecting the Project at the federal, State, and local levels.

(1) Federal

The federal Clean Air Act of 1963 was the first federal legislation regarding air pollution control and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the USEPA is responsible for implementation of certain portions of the Clean Air Act including mobile source requirements. Other portions of the Clean Air Act, such as stationary source requirements, are implemented by State and local agencies.

The Clean Air Act establishes federal air quality standards, known as National Ambient Air Quality Standards (NAAQS) and specifies future dates for achieving compliance. The Clean Air Act also mandates that the State submit and implement a State Implementation Plan for areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. The 1990 amendments to the Clean Air Act identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the Clean Air Act which are most applicable to the Project include attaining NAAQS for the following criteria pollutants: (1) O₃; (2) NO₂; (3) CO; (4) SO₂; (5) PM₁₀; and (6) lead. The NAAQS were amended in July 1997 to include an 8-hour standard for O₃ and to adopt a NAAQS for PM_{2.5}. **Table 4.B-2, Ambient Air Quality Standards**, shows the NAAQS currently in effect for each criteria pollutant.

As noted above, the Project is located within the South Coast Air Basin, which is an area designated as nonattainment because it does not currently meet NAAQS for certain pollutants regulated under the Clean Air Act. The Clean Air Act sets certain deadlines for meeting the NAAQS within the Air Basin including the following: (1) 1-hour O₃ by the year 2010; (2) 8-hour O₃ by the year 2024;⁹ (3) PM₁₀ by the year 2006; and (4) PM_{2.5} by the year 2015. Nonattainment designations are categorized into seven levels of severity: (1) basic, (2) marginal, (3) moderate, (4) serious, (5) severe-15, (6) severe-17, and (7) extreme.¹⁰ On June 11, 2007, the USEPA reclassified the Air Basin as a federal “attainment” area for CO and approved the

⁹ The 8-hour ozone attainment deadline for the 1997 standard of 80 parts per billion is 2024. The 8-hour ozone attainment deadline for the 2008 standard of 75 parts per billion is 2032.

¹⁰ The “-15” and “-17” designations reflect the number of years within which attainment must be achieved.

Table 4.B-2

Ambient Air Quality Standards

Pollutant	Average Time	California Standards ^a		National Standards ^b		
		Concentration ^c	Method ^d	Primary ^{c,e}	Secondary ^{c,f}	Method ^g
O ₃	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m ³)		0.075 ppm (147 µg/m ³)		
NO ₂ ^h	1 Hour	0.18 ppm (338 µg/m ³)	Gas Phase Chemi- luminescence	100 ppb (188 µg/m ³)	None	Gas Phase Chemi- luminescence
	Annual Arithmetic Mean	0.030 ppm (56 µg/m ³)		53 ppb (100 µg/m ³)	Same as Primary Standard	
CO	1 Hour	20 ppm (23 mg/m ³)	Non-Dispersive Infrared Photometry NDIR)	35 ppm (40 mg/m ³)	None	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10mg/m ³)		9 ppm (10 mg/m ³)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		—	—	
SO ₂ ⁱ	1 Hour	0.25 ppm (655 µg/m ³)	Ultraviolet Fluorescence	75 ppb (196 µg/m ³)	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method) ⁹
	3 Hour	—		—	0.5 ppm (1300 µg/m ³)	
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (for certain areas) ⁱ	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) ⁱ	—	
PM ₁₀	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		—		
PM _{2.5}	24 Hour	No Separate State Standard		35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12.0 µg/m ³	15 µg/m ³	
Lead ^{j,k}	30 Day Average	1.5 µg/m ³	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m ³ (for certain areas) ^k	Same as Primary Standard	
	Rolling 3- Month Average ^k	--		0.15 µg/m ³		

Table 4.B-2 (Continued)

Ambient Air Quality Standards

Pollutant	Average Time	California Standards ^a		National Standards ^b		
		Concentration ^c	Method ^d	Primary ^{c,e}	Secondary ^{c,f}	Method ^g
Visibility Reducing Particles ^l	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No Federal Standards		
Sulfates (SO ₄)	24 Hour	25 µg/m ³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ^j	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography			

- a California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM₁₀, PM_{2.5}, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.*
- b National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms/per cubic meter (µg/m³) is equal to or less than one. For PM_{2.5}, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.*
- c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.*
- d Any equivalent procedure which can be shown to the satisfaction of the California Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.*
- e National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.*
- f National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.*
- g Reference method as described by the USEPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the USEPA.*
- h To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb.*
- i On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.*
- j The California Air Resources Board has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.*
- k The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.*
- l In 1989, the California Air Resources Board converted both the general Statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the Statewide and Lake Tahoe Air Basin standards, respectively.*

Source: California Air Resources Board, Ambient Air Quality Standards (6/4/13), <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>. Accessed March 2015.

CO maintenance plan for the Air Basin.¹¹ The Air Basin previously exceeded the NAAQS for PM₁₀, but has met the NAAQS at all monitoring stations and the USEPA approved the request for re-designation to attainment effective July 26, 2013.¹² The Air Basin does not meet the NAAQS for O₃ and PM_{2.5} and is classified as being in nonattainment for these pollutants. The Los Angeles County portion of the Air Basin is designated as nonattainment for lead; however, this is due to localized emissions from two lead-acid battery recycling facilities located in the City of Vernon and the City of Industry, which are the only two lead-acid battery recycling facilities in Los Angeles County.¹³ The attainment status of the Los Angeles County portion of the Air Basin with respect to the NAAQS is summarized in **Table 4.B-3, South Coast Air Basin Attainment Status (Los Angeles County)**.

Table 4.B-3**South Coast Air Basin Attainment Status (Los Angeles County)**

Pollutant	National Standards	California Standards
O ₃ (1-hour standard)	N/A ^a	Nonattainment – Extreme
O ₃ (8-hour standard)	Nonattainment – Extreme	Nonattainment
CO	Attainment	Attainment
NO ₂	Attainment	Attainment
SO ₂	Attainment	Attainment
PM ₁₀	Attainment	Nonattainment
PM _{2.5}	Nonattainment	Nonattainment
Lead	Nonattainment	Attainment
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride	N/A	N/A ^b

N/A = not applicable

^a The NAAQS for 1-hour ozone was revoked on June 15, 2005, for all areas except Early Action Compact areas.

^b In 1990 the California Air Resources Board identified vinyl chloride as a toxic air contaminant and determined that it does not have an identifiable threshold. Therefore, the California Air Resources Board does not monitor or make status designations for this pollutant.

Source: United States Environmental Protection Agency, *The Green Book Nonattainment Areas for Criteria Pollutants*, <http://www.epa.gov/oaqps001/greenbk/index.html>. Accessed March 2015; California Air Resources Board, *Area Designations Maps/State and National*, <http://www.arb.ca.gov/deg/adm/adm.htm>. Accessed March 2015.

¹¹ *Federal Register*, Vol. 72, 26718-26721, "Approval and Promulgation of Implementation Plans and Designation of Areas for Air Quality Planning Purposes: California, Final Rule." May 11, 2007.

¹² *Federal Register*, Vol. 78, No. 123, 38223-38226, June 26, 2013.

¹³ *South Coast Air Quality Management District, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.*

Title II of the federal Clean Air Act pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps are a few of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have strengthened in recent years to improve air quality. For example, the standards for NO_x emissions have been lowered substantially, and the specification requirements for cleaner burning gasoline are more stringent.

(2) State

(a) California Clean Air Act

The California Clean Air Act, signed into law in 1988, requires all areas of the State to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. The CAAQS apply to the same criteria pollutants as the federal Clean Air Act but also include State-identified criteria pollutants, which include sulfates, visibility-reducing particles, hydrogen sulfide, and vinyl chloride. CARB has primary responsibility for ensuring the implementation of the California Clean Air Act,¹⁴ responding to the federal Clean Air Act planning requirements applicable to the State, and regulating emissions from motor vehicles and consumer products within the State. Table 4.B-3 shows the CAAQS currently in effect for each of the criteria pollutants as well as the other pollutants recognized by the State. As shown in Table 4.B-3, the CAAQS include more stringent standards than the NAAQS for most of the criteria air pollutants.

Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. Table 4.B-3 provides a summary of the attainment status of the Los Angeles County portion of the Air Basin with respect to the State standards. The Air Basin is designated as attainment for the California standards for sulfates and unclassified for hydrogen sulfide and visibility-reducing particles. Because vinyl chloride is a carcinogenic toxic air contaminant, the CARB does not classify attainment status for this pollutant.

(b) California Air Resources Board Air Quality and Land Use Handbook

The CARB published the *Air Quality and Land Use Handbook* in April 2005 to serve as a general guide for considering impacts to sensitive receptors from facilities that emit TAC emissions.¹⁵ The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors—such as children, the elderly, acutely ill, and chronically ill persons—from exposure to TAC emissions. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more such machines.

¹⁴ California Air Resources Board, *California Clean Air Act, Chapter 1568 of the Statutes of 1988*.

¹⁵ California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective, 2005*.

(c) California Air Resources Board On-Road and Off-Road Vehicle Rules

In 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time.

In 2010, CARB amended the Truck and Bus regulation to reduce NO_x, PM₁₀, and PM_{2.5} emissions from existing diesel vehicles operating in California with a gross vehicle weight rating greater than 14,000 pounds. For the largest trucks in the fleet, those with a gross vehicle weight rating greater than 26,000 pounds, fleet owners can either retrofit or replace engines to achieve 2010 engine standards or better by 2023 or they can install diesel particulate filters achieving at least 85 percent removal efficiency fleet-wide by January 1, 2016 and attain 2010 engine standards or better for NO_x by 2020.

In addition to limiting exhaust from idling trucks, CARB adopted regulation in 2007 that addresses emission standards for off-road diesel construction equipment of greater than 25 horsepower, such as bulldozers, loaders, backhoes and forklifts, by installing diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models. Implementation is staggered based on fleet size (which is the total of all off-road horsepower under common ownership or control), with the largest fleets to begin compliance by January 1, 2014. Each fleet must demonstrate compliance through either calculating and maintaining fleet average emissions targets or meeting the Best Available Control Technology (BACT) requirements by turning over or installing Verified Diesel Emission Control Strategies (e.g., engine retrofits) on a certain percentage of its total fleet horsepower by 2023 for large and medium fleets or by 2028 for small fleets.

(3) Local

(a) South Coast Air Quality Management District

The SCAQMD has jurisdiction over air quality planning for all of Orange County, Los Angeles County except for the Antelope Valley, the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The Air Basin is a subregion within SCAQMD jurisdiction. While air quality in the Air Basin has improved, the Air Basin requires continued diligence to meet the air quality standards.

(i) Air Quality Management Plan

The SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the CAAQS and NAAQS. In December 2012, the SCAQMD adopted the *2012 Air Quality Management Plan*, which incorporates the latest scientific and technological information and planning assumptions, including growth projections from the Southern California Association of Government's (SCAG) *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy*, and updated emission inventory methodologies for various source categories.¹⁶ The 2012 AQMP is the most recent plan to achieve air quality attainment within the region and

¹⁶ *South Coast Air Quality Management District, 2012 Air Quality Management Plan, <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>. Accessed March 2015.*

builds upon other agencies' plans to achieve federal standards for air quality in the Air Basin. It incorporates a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, and on-road and off-road mobile sources. The 2012 AQMP builds upon improvements in previous plans, and includes new and changing federal requirements, implementation of new technology measures, and the continued development of economically sound, flexible compliance approaches. In addition, it highlights the significant amount of emission reductions needed and the urgent need to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the timeframes allowed under the federal Clean Air Act.

The key undertaking of the 2012 AQMP is to bring the Air Basin into attainment with the NAAQS for the 24-hour PM_{2.5} standard by 2014. It also intensifies the scope and pace of continued air quality improvement efforts toward meeting the 2024 8-hour O₃ standard deadline with new measures designed to reduce reliance on the federal Clean Air Act Section 182(e)(5) long-term measures for NO_x and VOC reductions. The SCAQMD expects exposure reductions to be achieved through implementation of new and advanced control technologies as well as improvement of existing technologies.

The control measures in the 2012 AQMP consist of four components: (1) Air Basin-wide and Episodic Short-term PM_{2.5} Measures; (2) Contingency Measures; (3) 8-hour O₃ Implementation Measures; and (4) Transportation and Control Measures provided by the SCAG. In general, the SCAQMD's control strategy for stationary and mobile sources is based on the following approaches: (1) available cleaner technologies; (2) best management practices; (3) incentive programs; (4) development and implementation of zero- near-zero technologies and vehicles and control methods; and (5) emission reductions from mobile sources.

(ii) SCAQMD Air Quality Guidance Documents

The *CEQA Air Quality Handbook* was published by the SCAQMD in November 1993 to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. However, the SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*. While this process is underway, the SCAQMD recommends that lead agencies avoid using the screening tables in Chapter 6 (Determining the Air Quality Significance of a Project) of the *CEQA Air Quality Handbook*, because the tables were derived using an obsolete version of CARB's mobile source emission factor inventory, and the trip generation characteristics of the land uses identified in these screening tables were based on the fifth edition of the Institute of Transportation Engineer's *Trip Generation Manual*, instead of the most current edition. Additionally, the lead agency should avoid using the on-road mobile source emission factors in Table A9-5-J1 through A9-5-L (EMFAC7EP Emission Factors for Passenger Vehicles and Trucks, Emission Factors for Estimating Material Hauling, and Emission Factors for Oxides of Sulfur and Lead).¹⁷

The SCAQMD has published a guidance document called the *Localized Significance Threshold Methodology* for CEQA Evaluations that is intended to provide guidance in evaluating localized effects from mass emissions during construction.¹⁸ The SCAQMD adopted additional guidance regarding PM_{2.5} in a document called *Final*

¹⁷ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, November 1993.

¹⁸ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, 2008.

*Methodology to Calculate Particulate Matter (PM)_{2.5} and PM_{2.5} Significance Thresholds.*¹⁹ This latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and *Localized Significance Threshold Methodology*.

The SCAQMD has also adopted land use planning guidelines in the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, which considers impacts to sensitive receptors from facilities that emit TACs.²⁰ The SCAQMD's distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity of freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities). The guidance document introduces land use related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. The SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

(iii) SCAQMD Rules and Regulations

Several SCAQMD rules adopted to implement portions of the AQMP may apply to the proposed Project. For example, SCAQMD Rule 403 requires implementation of best available fugitive dust control measures during active construction periods capable of generating fugitive dust emissions from on-site earth-moving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads. The Project may be subject to the following SCAQMD rules and regulations:

Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions, and breakdown events. The following is a list of rules which may apply to the Project:

- **Rule 402 – Nuisance:** This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM₁₀ emissions to less than 50 micrograms per cubic meter (µg/m³) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for different specific sources. The following is a list of rules which may apply to the Project:

¹⁹ *South Coast Air Quality Management District, Final Methodology to Calculate Particulate Matter (PM)_{2.5} and PM_{2.5} Significance Thresholds, 2006.*

- **Rule 1113 – Architectural Coatings:** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- **Rule 1138 – Control of Emissions from Restaurant Operations:** This applies to owners and operators of commercial cooking operations, preparing food for human consumption. The rule requires the installation of emissions controls on chain-driven charbroilers used to cook meat.
- **Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_x emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule (greater than 2 million British thermal units [Btu] per hour and less than 5 million Btu per hour).
- **Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_x emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule (less than or equal to 2 million Btu per hour).
- **Rule 1186 – PM₁₀ Emissions from Paved and Unpaved Roads, and Livestock Operations:** This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM₁₀ emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XI sets emissions standards for TACs and other non-criteria pollutant emissions. The following is a list of rules which may apply to the Project:

- **Rule 1402 – Control of Toxic Air Contaminants from Existing Sources:** This rule sets standards for health risk associated with emissions of TACs from existing sources by specifying limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index (HI) applicable to total facility emissions and by requiring facilities to implement risk reduction plans to achieve specified risk limits, as required by the AB 2588 Air Toxics Hot Spots Program and this rule. The rule also specifies public notification and inventory requirements.
- **Rule 1472 – Requirements for Facilities with Multiple Stationary Emergency Standby Diesel-Fueled Internal Combustion Engines:** This rule regulated diesel particulate matter emissions from facilities with three or more stationary emergency standby diesel-fueled internal combustion engines. Facilities which comply with all applicable requirements of Rule 1402, including emissions from diesel engines at the facility, may be exempt from this rule.

²⁰ *South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, 2005.*

(b) Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties and addresses regional issues relating to transportation, the economy, community development, and the environment. SCAG is the federally designated Metropolitan Planning Organization for the majority of the Southern California region. With regard to air quality planning, SCAG adopted the *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy* in April 2012, which addresses regional development and growth forecasts and forms the basis for the land use and transportation control portions of the AQMP. The growth forecasts are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. The Regional Transportation Plan/Sustainable Communities Strategy and AQMP are based on projections originating within local jurisdictions.

SCAG's Sustainable Communities Strategy provides specific strategies for successful implementation. These strategies include supporting projects that encourage a diverse job opportunities for a variety of skills and education, recreation and culture, and a full-range of shopping, entertainment, and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles. It is anticipated that SCAG will update the Sustainable Communities Strategy in 2016 and evaluate progress in implementing the strategies.

In 2008, SCAG released the Regional Comprehensive Plan, which addresses regional issues such as housing, traffic/transportation, water, and air quality. The Regional Comprehensive Plan serves as an advisory document to local agencies in the Southern California region for their information and voluntary use for preparing local plans and handling local issues of regional significance. The Regional Comprehensive Plan presents a vision of how Southern California can balance air quality with growth and development by including goals such as: reducing emissions of criteria pollutants to attain federal air quality standards by prescribed dates and stated ambient air quality standards as soon as practicable; reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas; and to minimize land uses that increase the risk of adverse air pollution-related health impacts from exposure to TACs, particulates (PM₁₀ and PM_{2.5}), and CO.

(c) County of Los Angeles General Plan

Local jurisdictions, such as the County, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the County is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The County is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the County assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation measures.

The adopted 1980 County General Plan provides the fundamental basis for the County's land use and development policy. Within the Conservation and Open Space Element, the following policy statement and related policy apply to air quality:

Improve Air Quality: Air Quality in Los Angeles is severe enough to threaten health. Unfocused development and the dependence of the population on the automobile contribute to the problem.

- **Policy 1:** Actively support strict air quality regulations for mobile and stationary sources, and continued research to improve air quality. Promote vanpooling, carpooling and improved public transportation.

Project compliance with this policy is evaluated in Section 4.H, Land Use and Planning, of this Draft EIR.

(d) City of Industry General Plan

The City of Industry General Plan also contains a number of policies aimed at improving air quality within the City. Although the General Plan does not contain an Air Quality element, other General Plan elements such as Circulation and Resource Management contain policies related to air quality within the City. The City of Industry General Plan was updated in 2014 to set forth objectives, policies, standards, and programs for land use and new development, including Circulation and Resource Management for the Community as a whole. Applicable measures of the City of Industry General Plan Air Quality element are specified below as being the most current standards. These measures will be implemented in connection with development of the Project.²¹

Goal RM2: Improved air quality and reduced greenhouse gas emissions

- **Policy RM2-1** Comply with State building codes relative to indoor air quality
- **Policy RM2-2** Support efforts to reduce pollutants to meet State and Federal Clean Air Standards
- **Policy RM2-3** Collaborate with the CARB and other agencies within the South Coast Air Basin to improve regional air quality and achieve GHG reduction targets
- **Policy RM2-4** Prohibit siting of sensitive land uses within distances defined by CARB unless sufficient mitigation is provided.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The evaluation of potential impacts to local and regional air quality that may result from the construction and long-term operations of the Project is conducted as follows:

(1) Consistency with Air Quality Management Plan

The SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Air Basin is in nonattainment of the NAAQS (e.g., ozone and PM_{2.5}). The SCAQMD's 2012 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the NAAQS.

²¹ *City of Industry General Plan, June 2014. Accessed July 2015.*

These strategies are developed, in part, based on regional growth projections prepared by the SCAG. As part of its air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide and the *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy*, which provide the basis for the land use and transportation control portions of the AQMP and are used in the preparation of the air quality forecasts and the consistency analysis included in the AQMP. Both the Regional Comprehensive Plan and AQMP are based, in part, on projections originating with County and city general plans.

The 2012 AQMP was prepared to accommodate growth, reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are considered to be consistent with the assumptions used in the AQMP do not interfere with attainment because the growth is included in the projections utilized in the formulation of the AQMP. Thus, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's numeric indicators. The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by SCAG.

(2) Construction Impacts

Construction of the proposed uses pursuant to the Rowland Heights Plaza and Hotel Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. Mobile source emissions, primarily NO_x, would result from the use of construction equipment such as bulldozers, wheeled loaders, cranes, and haul trucks. Workers commuting to and from the Site would also generate mobile source emissions from passenger vehicles. Fugitive dust emissions would result from grading soil movement and excavation activities. Evaporative emissions of VOCs would be generated from the application of architectural coatings (i.e., paints) and asphalt paving.

As stated in Section 2.0, Project Description, of this Draft EIR, Project construction is proposed in two major phases. Phase 1 involves buildout of Parcel 1 (the Commercial Center) and Parcel 2 (the full-service Hotel A and associated subterranean parking). Phase 2 involves the buildout of Parcel 3 (the extended-stay Hotel B and associated subterranean parking). Construction of the two phases may overlap or be consecutive, depending on market conditions, but are not expected to commence simultaneously. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Mass daily emissions during construction were calculated using the California Emissions Estimator Model (CalEEMod), which is an emissions estimation/evaluation model developed in conjunction with SCAQMD and other California Air Districts. CalEEMod was used to assist in quantifying emissions from construction activities for buildout of the proposed Rowland Heights Plaza and Hotel Project. The output values used in this analysis were adjusted to be Project-specific based on construction equipment types and the construction schedule. For fugitive dust, consistent with Rule 403, water would be applied to disturbed areas of the Site with a control efficiency of 61 percent. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in Appendix B of this Draft EIR.

The potential for localized effects from the on-site portion of daily emissions are evaluated at nearby sensitive receptor locations that could be impacted by the Project based on the SCAQMD's Localized Significance Threshold (LST) methodology, which utilizes on-site mass emission rate look-up tables and Project-specific modeling, where appropriate. LSTs are applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard. For NO_x and CO emissions, LSTs are developed based on the local ambient concentrations of that pollutant and distance to the nearest sensitive receptor. For PM₁₀ and PM_{2.5}, LSTs were derived based on requirements in SCAQMD Rule 403, Fugitive Dust. The SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The screening criteria depend on: (1) the area in which the project is located, (2) the size of the project site, and (3) the distance between the project site and the nearest sensitive receptor (e.g., residences, schools, hospitals).

The screening criteria are generally applicable to projects five acres or less in disturbed area. Although the Project is larger than five acres, a mass rate look-up threshold was used as a conservative approach. Maximum on-site emissions from all phases of construction across the approximate 14-acre Site were compared to mass rate look-up thresholds for a five-acre site. Nearby receptors representing locations of off-site sensitive uses (i.e., residential uses) were assumed to be located over 100 meters south of the Project Site.

(3) Operational Impacts

Operation of the Project has the potential to generate criteria pollutant emissions from vehicle trips traveling to and from the Site. In addition, emissions would result from area sources such as fossil fuel combustion from landscaping equipment and evaporative loss emissions associated with cleaning and maintenance activities (consumer product usage, solvents, adhesives, coatings, etc.).

The operational emissions were estimated for the buildout year (2020). The mobile and area source emissions were estimated using CalEEMod. In calculating mobile source emissions, the trip length values were based on the distances provided in CalEEMod. The trip distances were applied to the maximum daily trip estimates based on trip generation rates provided by the Project traffic study²² to estimate the total vehicle miles traveled (VMT). The trips take into account VMT reductions from characteristics including the Site's proximity to existing public transit and internal capture of trips due to the mix of uses proposed. Stationary source emissions were estimated separately using emissions factors from the USEPA and SCAQMD as appropriate.

The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's LST methodology for NO_x, CO, PM₁₀, and PM_{2.5}. Sources of on-site emissions include natural gas combustion for heating or hot water and architectural coatings.

²² Kunzman Associates, Inc., Rowland Heights Plaza Traffic Impact Analysis, May 2015.

Localized CO concentrations are evaluated based on prior dispersion modeling of the four busiest intersections in the Basin that has been conducted by the SCAQMD for its CO Attainment Demonstration Plan in the AQMP. The analysis compares the intersections with the greatest peak-hour traffic volumes that would be impacted by the Project to the intersections modeled by the SCAQMD. Project-impacted intersections with peak-hour traffic volumes that are lower than the intersections modeled by the SCAQMD, in conjunction with lower background CO levels, would result in lower overall CO concentrations compared to the SCAQMD modeled values in its AQMP. Therefore, a qualitative analysis is sufficient to address localized CO impacts.

(4) Toxic Air Contaminants Impacts (Construction and Operations)

Potential TAC impacts are evaluated by conducting a qualitative screening-level analysis followed by a more detailed analysis (i.e., dispersion modeling), as necessary. The screening-level analysis applies only to operations of projects and consists of identification of new TAC emissions sources. If it is determined that a proposed project would introduce a potentially significant new source, then downwind sensitive receptor locations are identified and site-specific dispersion modeling is conducted to determine proposed project impacts.

The CARB screening criteria does not provide methodologies to address construction impacts of TAC emissions, i.e. diesel particulate matter. Diesel exhaust particulate matter (DPM) is a TAC of particular concern during construction projects for its potential to cause adverse respiratory and cardiovascular health effects. DPM is emitted by heavy equipment and generators, as well as by the trucks that transport large quantities of materials to and from construction sites.

TAC impacts also take into account separation distances between sensitive receptors and the TAC source. The Project is not expected to emit large quantities of TACs and the closest sensitive receptors are over 300 feet away. Therefore, a qualitative analysis would be sufficient to address TAC impacts.

(5) Odor Impacts (Construction and Operations)

Potential odor impacts are evaluated by conducting a screening-level analysis followed by a more detailed analysis (i.e., dispersion modeling) as necessary. The screening-level analysis consists of reviewing the Project's site plan and Project description to identify new or modified odor sources. If it is determined that the proposed Project would introduce a potentially significant new odor source, then downwind sensitive receptor locations are identified and site-specific dispersion modeling is conducted to determine proposed Project impacts.

b. Thresholds of Significance

The potential for air quality impacts is based on thresholds derived from Los Angeles County Department of Regional Planning Initial Study Checklist screening questions, which are based in part on Appendix G of the State *CEQA Guidelines*. These questions are as follows:

3. Air Quality. Would the project:

- a) Conflict with or obstruct implementation of applicable air quality plans of either the South Coast Air Quality Management District (SCAQMD) or the Antelope Valley AQMD?
- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
- d) Expose sensitive receptors to substantial pollutant concentrations?
- e) Create objectionable odors affecting a substantial number of people?

The State *CEQA Guidelines* (Section 15064.7) provide that, when available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make determinations of significance. The potential air quality impacts of the proposed project are, therefore, evaluated according to thresholds developed by SCAQMD in the *CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook*, and subsequent guidance, discussed below. These thresholds generally incorporate the checklist questions stated above. Based on these factors, the Project would have a potentially significant impact on air quality, including: (1) consistency with air quality plans and policies, (2) ambient air quality standards, (3) considerable net increase of any nonattainment criteria pollutant, (4) substantial pollutant concentrations, or (5) odors if the following were to occur:

(1) Consistency with Air Quality Plans and Policies

The Project would have a significant impact if it would:

- AQ-1:** Substantially conflict with or obstruct implementation of relevant air quality policies in the General Plan or other adopted regional and local plans adopted for reducing air quality impacts.

The SCAQMD is required, pursuant to the CAA, to reduce emissions of criteria pollutants for which the Air Basin is in nonattainment of Federal standards. Development of the Project would be subject to the SCAQMD's 2012 AQMP.²³ The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by SCAG.

A project is consistent with the AQMP if it is consistent with the applicable rules and regulations and the population, housing, and employment assumptions which were used in the development of the AQMP. The 2012 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy socioeconomic forecast projections of regional population and employment growth.

(2) Ambient Air Standards

The SCAQMD has established numerical emission indicators of significance for construction and operation. The numerical emission indicators are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.²⁴ Based on the indicators in the SCAQMD *CEQA Air Quality Handbook*, the Project would potentially cause or contribute to an exceedance of an ambient air quality standard if either of the following would occur:

AQ-2: Regional construction emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed daily emissions thresholds:²⁵

- 75 pounds a day for VOC;
- 100 pounds per day for NO_x;
- 550 pounds per day for CO;
- 150 pounds per day for SO₂;
- 150 pounds per day for PM₁₀; or
- 55 pounds per day for PM_{2.5}.

AQ-3: Operational emissions exceed any of the following SCAQMD prescribed daily regional numeric indicators:²⁶

- 55 pounds a day for VOC;
- 55 pounds per day for NO_x;
- 550 pounds per day for CO;
- 150 pounds per day for SO_x;
- 150 pounds per day for PM₁₀; or
- 55 pounds per day for PM_{2.5}.

(3) Considerable Net Increase of any Nonattainment Criteria Pollutant

The Air Basin fails to meet national and State standards for O₃ (for both the 1-hour and 8-hour standard), PM₁₀ (24 hour and annual), and PM_{2.5}, and therefore is considered a federal and State “nonattainment” area for these pollutants. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or State nonattainment pollutant.

²⁴ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, November 1993, page 6-2.

²⁵ South Coast Air Quality Management District, *SCAQMD Air Quality Significance Thresholds*, Revised March 2015, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed July 2015.

²⁶ South Coast Air Quality Management District, *SCAQMD Air Quality Significance Thresholds*, Revised March 2015, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed July 2015. The L.A. CEQA Thresholds Guide also includes a threshold of 10 tons per year of VOCs; however, this is equivalent to the SCAQMD daily threshold of 55 pounds per day.

- AQ-4:** Project construction or operational emissions exceed any of the SCAQMD prescribed daily regional numeric indicators for nonattainment criteria pollutants or ozone.

(4) Substantial Pollutant Concentrations

LSTs were developed in response to the SCAQMD Governing Board's Environmental Justice Enhancement Initiative (I-4). LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard, and are developed based on the local ambient concentrations of that pollutant and distance to the nearest sensitive receptor.

LSTs, which are voluntary, only apply to CO, NO₂, PM₁₀, and PM_{2.5} emissions during construction and operation at the discretion of the lead agency. Screening-level analysis of LSTs is only recommended for construction activities at project sites that are five acres or less. However, as a conservative assumption, mass rate look-up thresholds were used for analysis of localized construction emissions.

As discussed previously under Subsection 3.a.(2), the SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards or ambient concentration limits without project-specific dispersion modeling. This analysis will use the screening criteria to evaluate impacts from localized emissions.

The SCAQMD has developed a methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards or ambient concentration limits. Impacts would be considered significant if any of the following would occur:

- AQ-5:** Maximum daily localized emissions of NO_x and/or CO during construction or operations are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for NO₂ and/or CO.²⁷
- AQ-6:** Maximum daily localized emissions of PM₁₀ and/or PM_{2.5} during construction or operations are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 10.4 µg/m³ over 24 hours (SCAQMD Rule 403 control requirement) during construction or 2.5 µg/m³ over 24 hours during operations.

Based on criteria set forth in the SCAQMD *CEQA Air Quality Handbook*, the Project would have a significant impact with regard to operational emissions if the following would occur:

²⁷ South Coast Air Quality Management District, *Localized Significance Thresholds*, 2003, revised 2008, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds..> Accessed September 2014.

- Traffic generated by the Project causes an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively, at an intersection or roadway within one-quarter mile of a sensitive receptor.

Impacts would be considered significant if the following would occur:

- AQ-7:** Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
- The Project would cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 parts per million (ppm), respectively.

Based on the criteria set forth by the SCAQMD, the Project would expose sensitive receptors to substantial concentrations of toxic air contaminants if any of the following would occur:²⁸

- AQ-8:** The Project emits carcinogenic materials or TACs that exceed the maximum incremental cancer risk of ten in one million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) or an acute or chronic hazard index of 1.0.

As discussed under Subsection 3.a.(4), construction impacts from TACs are evaluated qualitatively because of the sporadic and temporary nature of construction emissions and the limited sources of TACs associated with operations. Therefore, a qualitative assessment will be used to determine whether the Project would result in a significant impact by exceeding the above-referenced standard. Impacts regarding TACs exposure are also evaluated in Section 4.H, Land Use and Planning.

(5) Odors

The SCAQMD *CEQA Air Quality Handbook* contains secondary thresholds consistent with Appendix G CEQA guidelines regarding odors. More specifically, the Project would have a significant impact if it:

- AQ-9:** Has the potential to create, or be subjected to, an objectionable odor that could impact a substantial number of sensitive receptors.

c. Project Characteristics or Design Features

(1) Project Characteristics

The Project would be located at a location in close proximity to existing and future public transit stops, which would result in reduced vehicle trips and VMT, as compared to a business-as-usual (BAU), that is, emissions that would occur for greenfield projects without close access to off-site destinations and public transit stops. As such, the Project would result in a corresponding reduction in transportation-related emissions compared to a BAU project.

²⁸ *South Coast Air Quality Management District, CEQA Air Quality Handbook, Chapter 6, Determining the Air Quality Significance of a Project, and Chapter 10, Assessing Toxic Air Pollutants, November 1993; South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, Revised March 2015, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed July 2015.*

The California Air Pollution Control Officers Association (CAPCOA) has provided guidance on mitigating or reducing emissions from land use development projects. In September 2010, CAPCOA released a guidance document titled *Quantifying Greenhouse Gas Mitigation Measures* which provides emission reduction values for recommended mitigation measures. The CAPCOA guidance document was utilized in this analysis for quantifying reductions from physical and operational Project characteristics and Project Design Features in CalEEMod.

The Project characteristics listed below are consistent with the CAPCOA guidance document, and would reduce vehicle trips to and from the Project Site compared to a BAU project without these Project characteristics. They would therefore result in a corresponding reduction in VMT and associated GHG emissions.

- **Increased Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies such as enhanced transit services. When compared to existing zoning or BAU conditions for the Project Site, the increase in job density would result in fewer trips and distance travelled for workers which would also reduce GHG emissions. The Project would increase the Project Site density to approximately 78 jobs per acre compared to the undeveloped condition of the Site. The Project would also result in increased job density compared to existing zoning of the site.
- **Location Efficiency:** Location efficiency describes the location of the Project relative to the type of urban landscape such as an urban area, compact infill, or suburban center. In general, compared to the Statewide average, a project could realize VMT reductions up to 65 percent in an urban area, up to 30 percent in a compact infill area, or up to 10 percent in a suburban center from land use/location strategies. The Project Site represents a suburban center within the Rowland Heights community of the unincorporated County of Los Angeles. The Project Site is served by existing public transportation located within a quarter-mile. The Project Site is surrounded by many existing off-site commercial and residential buildings. The location efficiency of the Project Site would result in synergistic benefits that would reduce vehicle trips and VMT compared to the Statewide average and would result in corresponding reductions in transportation-related emissions.
- **Increased Land Use Diversity and Mixed-Uses:** The Project would co-locate complementary commercial and office land uses in close to proximity to existing off-site commercial and residential uses. The Project would include on-site retail and recreational land uses and would be located within a quarter-mile of off-site commercial and residential uses. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.
- **Increased Transit Accessibility:** The Project would be located within a quarter-mile of public transportation, including existing Foothill Transit bus routes (e.g., 178 and 289). The Project would provide access to on-site uses from existing pedestrian pathways. The increased transit accessibility would reduce vehicle trips and VMT versus the Statewide average and encourage walking and non-automotive forms of transportation and would result in corresponding reductions in transportation-related emissions.

- **Provide Pedestrian Network Improvements:** Providing pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets encourages people to walk instead of drive. The Project would provide an internal pedestrian network that links to the existing off-site pedestrian network and thus would result in a small reduction in VMT and associated transportation-related emissions.

(2) Project Design Features

The Project would achieve several objectives of the County of Los Angeles General Plan Air Quality Element, SCAG Regional Transportation Plan, and SCAQMD Air Quality Management Plan for establishing a regional land use pattern that promotes sustainability. The Project would provide for retail uses which reduces vehicle trips and distance travelled as well as air pollution by locating retail uses near residential uses. Although the project would not be located in a residential neighborhood (walking distance), the project would place retail uses closer to residential uses resulting in shorter travel distances.

The Project would be designed to meet the standards for Leadership in Energy and Environmental Design® (LEED®) Silver Certification by the United States Green Building Council (USGBC) through the incorporation of green building techniques and other sustainability features. Key Project Design Features that would contribute to energy efficiencies include the use of glass/window areas for ventilation and daylight accessibility, and landscaping of roof decks. Other building features would include such items as stormwater retention; installation of heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; use of materials and finishes that emit low quantities of VOCs; use of high-efficiency fixtures and appliances and water conservation features; and recycling of solid wastes. The Project would also be designed to comply with the County of Los Angeles Green Building Standards and Low Impact Development (LID) requirements. The following Project Design Features would reduce air pollutant emissions:

PDF-AQ-1: The Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and achieve the equivalent of USGBC LEED® Silver Certification. These measures would also include consistency with Los Angeles County Green Building Standards and Low Impact Development requirements. The Project would incorporate measures and performance standards which include but are not limited to the following:

- The Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous construction debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area.
- The Project would be designed to optimize energy performance and reduce building energy cost by 10 percent for new construction compared to ASHRAE 90.1-2010, Appendix G, and the Title 24 Building Standards Code.
- The Project would reduce indoor water use by a minimum of 35 percent by installing water fixtures that exceed applicable standards.

d. Project Impacts

(1) Consistency of the Project with Applicable Plans and Policies

Threshold AQ-1: A significant impact would occur if the Project would substantially conflict with relevant air quality policies in the General Plan or other adopted regional and local plans adopted for reducing air quality impacts.

Impact Statement AQ-1: Project uses, including hotel, retail, and restaurant uses, would be consistent with adopted regulatory policies and guidance regarding air quality. Impacts would be less than significant.

(2) Consistency with Air Quality Management Plan

(a) Construction

Under this criterion, the SCAQMD recommends that lead agencies demonstrate that a project would not directly obstruct implementation of an applicable air quality plan and that a project be consistent with the assumptions (typically land use related, such as resultant employment or residential units) upon which the air quality plan are based. The Project would result in an increase in short-term employment compared to existing conditions. Being relatively small in number and temporary in nature, construction jobs under the Project would not conflict with the long-term employment projections upon which the AQMP is based. Control strategies in the AQMP with potential applicability to short-term emissions from construction activities include strategies denoted in the AQMP as ONRD-04 and OFFRD-01, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. The Project would not conflict with implementation of these strategies. Additionally, the Project would comply with CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment. The Project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403.

Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Because the Project would not conflict with the control strategies intended to reduce emissions from construction equipment, the Project would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

(b) Operations

The 2012 AQMP was prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used in the formulation of the AQMP.

As discussed in Section 4.H, Land Use and Planning, of this Draft EIR, the County portion of the Project Site is zoned M-1.5-BE, where "M-1.5" denotes Restricted Heavy Manufacturing, which permits a broad range of industrial and commercial uses, including most commercial uses permitted in the C3 Unlimited Commercial

zone, but prohibits (among other uses) heavy manufacturing, residential uses, and hotels or motels (considered transitory residential uses).²⁹ Thus, the Project is seeking a change in zoning to C-3 (DP) (Unlimited Commercial-Development Program) for the proposed hotel uses. The portion of the Project Site within the City of Industry is designated on the City of Industry General Plan Land Use as Employment and carries a zoning designation of Industrial (I), which permits a broad range of commercial and industrial uses including manufacturing.

The Project Site is consistent with the underlying General Plan Land Use designation for the Project Site, and, with the exception of the requested Zone Change for Parcels 2 and 3, which total approximately 5.15 acres or a third of the Project Site area, is consistent with the underlying zoning. The Project Site as a whole is proposed to provide approximately 26.6 percent lot coverage at buildout, well under the permitted 40 percent lot coverage maximum stipulated in the Rowland Heights Community Standards District. The Project proposes no residential uses or permanent population increase in the Project area.

Existing zoning for the Project Site permits a considerably greater maximum commercial development density than is proposed for the Commercial Center retail uses, which would be limited only by the maximum permitted lot coverage and building height. Even though a Zone Change is sought for a portion of the Project Site (Parcels 2 and 3) to allow development of the two proposed hotels, because of their relatively small size, hotel-related trip generation would still be less than if the entire Project Site were developed to its maximum permitted density). As a result, trip generation under the Project, considering the relatively small size of the proposed Commercial Center, would be less than the maximum allowed under existing zoning. Since the AQMP is based on growth assumptions under current zoning, and the Project would generate fewer trips and lower emissions than the maximum permitted under the existing zoning assuming development of the Project Site with all commercial uses, the Project would be consistent with overall growth on a regional level. As such, the Project would be consistent with the growth projections as contained in the County and City's General Plans and thus be consistent with the growth projections in the AQMP.

The AQMP includes Transportation Control Measures that are intended to reduce regional mobile source emissions. While the majority of the measures are implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, the Project would be supportive of measures related to reducing vehicle trips for patrons and employees and increasing commercial density near public transit (see discussion under Subsection 3.c, Project Characteristics or Design Features).

As the Project would be consistent with the growth projections in the AQMP and would be supportive of relevant Transportation Control Measures aimed at reducing vehicle trips, impacts related to consistency with these plans would be less than significant.

²⁹ *Los Angeles County Code, Title 22, Planning and Zoning Code, Chapter 22.32.100 et seq.*

(3) Violation of Air Quality Standards

Threshold AQ-2: A significant impact would occur if regional construction emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed daily regional numeric indicators: 75 pounds a day for VOC; 100 pounds per day for NO_x; 550 pounds per day for CO; 150 pounds per day for SO₂; 150 pounds per day for PM₁₀; 55 pounds per day for PM_{2.5}.

Impact Statement AQ-2: *Construction of the Project would not exceed the applicable SCAQMD daily numeric indicators for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Project-related construction emissions would result in a less than significant impact.*

(a) Construction

Construction of the proposed uses has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from excavation and debris removal. The maximum daily regional construction emissions were calculated for the two phases of construction. It should be noted that the maximum daily emissions are predicted values for the worst-case day and do not represent the emissions that would occur for every day within the construction period. Detailed emissions calculations are provided in Appendix B of this Draft EIR. Results of the criteria pollutant calculations are presented in **Table 4.B-4, Maximum Unmitigated Regional Construction Emissions (pounds per day)**. As shown, construction-related daily emissions for the criteria and precursor pollutants would not exceed the SCAQMD regional thresholds of significance for VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. These calculations include appropriate dust control measures that would be implemented during each phase of construction, as required by SCAQMD Rule 403 (Control of Fugitive Dust). Therefore, with respect to regional emissions from construction activities, impacts would be less than significant.

(b) Operation

Threshold AQ-3: A significant impact would occur if regional operational emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed daily regional numeric indicators: 55 pounds a day for VOC; 55 pounds per day for NO_x; 550 pounds per day for CO; 150 pounds per day for SO₂; 150 pounds per day for PM₁₀; 55 pounds per day for PM_{2.5}.

Impact Statement AQ-3: *Operational emissions from the Project would potentially exceed the threshold of significance for VOC and NO_x. As a result, operation of the Project would result in a potentially significant air quality impact for VOC and NO_x. At full buildout, the Project could potentially result in emissions that lead to a violation of an air quality standard or contribute substantially to an existing or projected air quality violation; thus, operational impacts would be significant.*

Operational emissions were assessed for mobile, area, and stationary sources. Operational criteria pollutant emissions were calculated for the Project for an interim year which corresponds to buildout of Phase 1 (2018) with concurrent construction of Phase 2 and the full buildout year (2020). Daily trip generation rates for the Project were provided by the Project traffic study³⁰ and include trips associated with the proposed

³⁰ Kunzman Associates, Inc., Rowland Heights Plaza Traffic Impact Analysis, May 2015.

Table 4.B-4

Maximum Unmitigated Regional Construction Emissions^a
(pounds per day)

Construction Source	Regional Emissions					
	VOC	NO _x	CO	SO _x	PM ₁₀ ^c	PM _{2.5} ^b
Phase 1						
Site Preparation	2	19	15	<1	4	2
Grading	3	36	24	<1	3	2
Building Foundation	2	18	11	<1	1	1
Concrete Pour (Podium)	3	21	20	<1	2	1
Building Construction	4	24	39	<1	5	2
Paving	1	5	5	<1	0	0
Finishes	60	4	7	<1	1	0
Maximum Phase 1 Emissions	64	54	50	<1	6	3
Phase 2						
Building Foundation	2	29	25	<1	2	1
Concrete Pour (Podium)	<1	<1	1	<1	<1	<1
Building Construction	2	15	17	<1	2	1
Paving	1	14	15	<1	1	1
Finishes	43	2	3	<1	<1	<1
Maximum Phase 2 Emissions	46	29	34	<1	3	2
Maximum Regional Emissions	64	54	50	<1	6	3
Regional Significance Threshold	75	100	550	150	150	55
Over (Under)	(11)	(46)	(500)	(150)	(144)	(52)
Exceed Threshold?	No	No	No	No	No	No

^a Emission quantities are rounded to "whole number" values. As such, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod printout sheets and/or calculation worksheets that are presented in Appendix B of this Draft EIR.

^b PM₁₀ and PM_{2.5} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

Source: PCR Services Corporation, 2015

hotel, office, retail space, and restaurants. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

Results of the criteria pollutant calculations are presented in **Table 4.B-5, Maximum Unmitigated Regional Operational Emissions (pounds per day)**. The operational-related daily emissions for the criteria and precursor pollutants (VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}) would exceed the threshold of significance for VOC and NO_x during interim operations when combined with ongoing construction emissions. Therefore, with respect to regional emissions from operations, impacts would be potentially significant for VOC and NO_x during interim operations. As discussed previously, NO₂-related health impacts include irritation of the nose and throat, aggravation of lung and heart problems, and may increase susceptibility to respiratory infections,

Table 4.B-5

Maximum Unmitigated Regional Operational Emissions – Interim and Buildout ^a
(pounds per day)

Operational Source	VOC	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
Interim (2019-2020)						
Area (Coating, Consumer Products, Landscaping)	23	<1	<1	<1	<1	<1
Energy (Natural Gas, Electricity)	1	5	4	<1	<1	<1
Mobile (Motor Vehicles)	30	64	269	1	43	12
Maximum Construction Emissions (Phase 2)	46	29	34	<1	3	2
Maximum Emissions	99	97	307	1	46	14
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	44	42	(243)	(149)	(104)	(41)
Exceed Threshold?	Yes	Yes	No	No	No	No
Buildout Year (2020)						
Area (Coating, Consumer Products, Landscaping)	22	0	0	0	0	0
Energy (Natural Gas, Electricity)	0	4	3	0	0	0
Mobile (Motor Vehicles)	34	71	308	1	53	15
Max Emissions	57	75	311	1	53	15
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	2	20	(239)	(149)	(97)	(40)
Exceed Threshold?	Yes	Yes	No	No	No	No

^a Emission quantities are rounded to “whole number” values. As such, the “total” values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod printout sheets and/or calculation worksheets that are presented in Appendix B.

Source: PCR Services Corporation, 2015

especially in people with asthma. At full buildout, long-term operational impacts would continue to exceed thresholds for regional VOC and NO_x emissions. Therefore, Project related operational emissions would result in a significant impact.

(4) Nonattainment Pollutants

Threshold AQ-4: A significant impact would occur if Project construction or operational emissions exceed any of the SCAQMD prescribed daily regional numeric indicators for nonattainment criteria pollutants or ozone.

Impact Statement AQ-4: Construction of the Project would not exceed the SCAQMD daily regional numeric indicators for emissions of ozone precursors (NO_x, VOC). The incremental change in interim operational emissions, when combined with concurrent Phase 2 construction emissions, would exceed the daily threshold of significance for VOC and NO_x. Peak-day operational emissions at full buildout of the Project would be less than those during operational/construction overlap, but would also exceed the SCAQMD

daily regional numeric indicator for VOC and NO_x. As a result, operation of the Project would result in a potentially significant air quality impact for VOC and NO_x (ozone precursor).

Thus, construction and interim operations of the Project would potentially result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is nonattainment, and impacts would be potentially significant. Project construction and operational emissions would remain below numeric indicators for PM₁₀ and PM_{2.5}. (a) Construction

(a) Construction

Construction of the Project would result in the emission of criteria pollutants for which the region is in nonattainment. The Los Angeles County portion of the Air Basin is designated nonattainment for the ozone and PM_{2.5} NAAQS and nonattainment for the ozone, NO₂, PM₁₀, and PM_{2.5} CAAQS. As shown in Table 4.B-4, maximum daily emissions from construction of the Project would not exceed SCAQMD significance thresholds. In addition, Project compliance with CARB and SCAQMD control measures would be implemented to minimize and reduce construction emissions. As construction of the Project would not exceed regional SCAQMD significance thresholds, the Project would result in a less than significant impact with regard to cumulative emissions.

(b) Operations

Operation of the Project would result in the emission of criteria pollutants for which the region is in nonattainment. As shown in Table 4.B-5, maximum daily emissions from operation of the Project would exceed the threshold of significance for VOC and NO_x during interim operations when combined with ongoing construction emissions as well as full buildout. Therefore, with respect to regional emissions from operations, impacts would be potentially significant for VOC and NO_x during interim operations and full buildout. Project operational emissions of PM₁₀ and PM_{2.5} would remain below SCAQMD daily significance thresholds.

(5) Substantial Pollutant Concentrations

Threshold AQ-5: A significant impact would occur if the maximum daily localized emissions of NO_x and/or CO during construction or operations are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for NO₂ and/or CO.

Threshold AQ-6: A significant impact would occur if the maximum daily localized emissions of PM₁₀ and/or PM_{2.5} during construction or operations are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 10.4 µg/m³ over 24 hours (SCAQMD Rule 403 control requirement) during construction and 2.5 µg/m³ over 24 hours during operations.

Impact Statement AQ-5: *Impacts regarding the Project's contribution to local CO and NO₂ concentrations would be less than significant. Construction and operation of the Project would not exceed the SCAQMD localized significance thresholds for CO and NO_x at nearby sensitive receptors.*

Impact Statement AQ-6: *Impacts regarding the Project's contribution to local PM₁₀ and PM_{2.5} concentrations would be less than significant. Localized PM₁₀ and PM_{2.5} emissions would not exceed the SCAQMD localized significance threshold.*

(a) Construction

(i) Localized Impacts

The localized construction air quality analysis was conducted using the methodology described in the SCAQMD *Localized Significance Threshold Methodology* (June 2003, revised July 2008).³¹ The screening criteria provided in the *Localized Significance Threshold Methodology* were used to determine localized construction emissions thresholds for the Project at the nearest residential receptor approximately 300 feet away. The maximum daily localized emissions for each of the construction phases and localized significance thresholds are presented in **Table 4.B-6, Maximum Unmitigated Localized Construction Emissions (pounds per day)**. As shown therein, criteria pollutant emissions would not exceed the allowable thresholds. Therefore, with respect to localized construction emissions, impacts would be less than significant.

(b) Operations

(i) Localized Impacts

The localized operational air quality analysis was conducted using the methodology described in the SCAQMD *Localized Significance Threshold Methodology* (June 2003, revised July 2008).³² The screening criteria provided in the *Localized Significance Threshold Methodology* were used to determine localized operational emissions thresholds for the Project. The maximum daily localized emissions and localized significance thresholds are presented in **Table 4.B-7, Maximum Unmitigated Localized Operational Emissions – Interim and Buildout (pounds per day)**. As shown therein, maximum localized operational emissions for sensitive receptors would not exceed the localized thresholds for NO_x, CO, PM₁₀ and PM_{2.5}. Therefore, with respect to localized operational emissions, impacts would be less than significant.

(ii) Carbon Monoxide Hotspots (Construction and Operations)

Threshold AQ-7: A significant impact would occur if either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:

- The Project would cause or contribute to an exceedance of the one-hour CO CAAQS of 20 parts per million (ppm), or
- The Project would cause or contribute to an exceedance of the eight-hour CO CAAQS of 9.0 ppm.

Impact Statement AQ-7: *Project impacts regarding the concentration of CO at intersections in the Project vicinity would be less than significant. The number of traffic trips generated by the Project would not contribute to the formation of CO hotspots in excess of the applicable standards.*

³¹ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology, 2008*.

³² South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology, 2008*.

Table 4.B-6

**Maximum Unmitigated Localized
Construction Emissions^a (pounds per day)**

Construction Source	Regional Emissions			
	NO _x	CO	PM ₁₀ ^b	PM _{2.5} ^b
Phase 1				
Site Preparation	19	15	3	2
Grading	33	21	2	2
Building Foundation	18	10	1	1
Concrete Pour (Podium)	21	19	1	1
Building Construction	14	10	1	1
Paving	5	4	<1	<1
Finishes	3	4	<1	<1
Maximum Phase 1 Emissions	51	31	3	3
Phase 2				
Building Foundation	19	15	1	1
Concrete Pour (Podium)	<1	<1	<1	<1
Building Construction	12	10	1	1
Paving	14	14	1	1
Finishes	2	2	<1	<1
Maximum Phase 2 Emissions	27	26	2	2
Maximum Localized Emissions	51	31	3	3
Localized Significance Threshold^c	330	3,691	51	15
Over (Under)	(279)	(3660)	(48)	(12)
Exceed Threshold?	No	No	No	No

^a Emission quantities are rounded to "whole number" values. As such, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod printout sheets and/or calculation worksheets that are presented in Appendix B.

^b PM₁₀ and PM_{2.5} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

^c LSTs based on SRA 10 (Pomona/Walnut Valley) for a five-acre site at 100 meters.

Source: PCR Services Corporation, 2015

The potential for the Project to cause or contribute to CO hotspots is evaluated by comparing Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of its AQMPs and considering existing background CO concentrations. As discussed below, this comparison provides evidence that the Project would not cause or contribute to the formation of CO hotspots, that CO concentrations at Project impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

As shown previously in Table 4.B-1, CO levels in the Project area are substantially below the federal and State standards. Maximum CO levels in recent years are 3 ppm (one-hour average) and 2.4 ppm (eight-hour

Table 4.B-7

Maximum Unmitigated Localized Operational Emissions – Interim and Buildout^{a, b}
(pounds per day)

Operational Source	NO _x	CO	PM ₁₀	PM _{2.5}
Interim Year (2019-2020)				
Area (Coating, Consumer Products, Landscaping)	<1	<1	<1	0
Energy (Natural Gas, Electricity)	5	4	<1	0
Max Emissions	5	4	<1	0
SCAQMD Significance Threshold	330	3,691	13	4
Over/(Under)	(325)	(3687)	(13)	(4)
Exceed Threshold?	No	No	No	No
Buildout Year (2020)				
Area (Coating, Consumer Products, Landscaping)	<1	<1	<1	<1
Energy (Natural Gas, Electricity)	4	3	<1	<1
Max Emissions	4	4	<1	<1
SCAQMD Significance Threshold	330	3,691	13	4
Over/(Under)	(326)	(3687)	(13)	(4)
Exceed Threshold?	No	No	No	No

^a Emission quantities are rounded to “whole number” values. As such, the “total” values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod printout sheets and/or calculation worksheets that are presented in Appendix B.

^b SCAQMD LST Look-Up Table from SRA 10 (Pomona/Walnut Valley Monitoring Station) for a five-acre site with source receptors at 100 meters.

Source: PCR Services Corporation, 2015

average) compared to the thresholds of 20 ppm (one-hour average) and 9.0 (eight-hour average). Carbon monoxide decreased dramatically in the Air Basin with the introduction of the catalytic converter in 1975.

No exceedances of CO have been recorded at monitoring stations in the Air Basin for some time, and the Air Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Thus, it is not expected that CO levels at Project-impacted intersections would rise to the level of an exceedance of these standards.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin. These include: (a) Wilshire Boulevard and Veteran Avenue, (b) Sunset Boulevard and Highland Avenue, (c) La Cienega Boulevard and Century Boulevard, and (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County with an average daily traffic volume of about 100,000 vehicles per day.³³ This intersection is located near the on- and off-ramps to Interstate 405 in

³³ South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, 2003, page V-4-24.

West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue.³⁴ When added to the existing background CO concentrations, the screening values would be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average).

Based on the Project traffic study, of the studied intersections that are predicted to operate at a Level of Service (LOS) of D, E, or F under Future (2020) With Project Plus Cumulative conditions, no intersections would have peak traffic volumes exceeding 100,000 per day.³⁵ As a result, CO concentrations are expected to be less than 7.7 ppm (one-hour average) and 5.7 ppm (eight-hour average), which would not exceed the thresholds.³⁶ Thus, this comparison provides evidence that the Project would not contribute to the formation of CO hotspots and no further CO analysis is required. Therefore, the Project would result in less than significant impacts with respect to CO hotspots.

(6) Toxic Air Contaminants

Threshold AQ-8: The Project would have a significant impact with respect to exposure of sensitive receptors to substantial concentrations of TACs if it emits carcinogenic materials or TACs that exceed the maximum incremental cancer risk of ten in one million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) or an acute or chronic hazard index of 1.0.

Impact Statement AQ-8: *Impacts from the emission of TACs would be less than significant for Project construction and less than significant with respect to Project operations. Receptors are located over 300 feet away from the Project Site. Based on this distance and the short-term nature of construction emissions, Project construction and operational TAC emissions would not result in a significant impact to off-site sensitive receptors. Therefore, the Project would result in a less than significant impact with regard to construction and operational TAC emissions.*

(a) Construction

The greatest potential for TAC emissions would be related to diesel particulate matter emissions associated with heavy equipment operations during demolition, grading, and trenching activities. In addition, incidental amounts of toxic substances such as oils, solvents, and paints would be used. These products would comply with all applicable SCAQMD rules for their manufacture and use. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Individual cancer risk is the likelihood that a person exposed to concentrations of TACs over a lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the temporary and short-term construction schedule, Project construction would not result in a long-term substantial source of

³⁴ The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

³⁵ Kunzman Associates, Inc., Rowland Heights Plaza Traffic Impact Analysis,, May 2015.

³⁶ The expected CO concentrations are calculated based on the ratio of 101,700/100,000 multiplied by the screening values of 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average). Actual CO value would likely be less than the expected values reported in the analysis as the average CO emissions from motor vehicles operating today have declined as compared to motor vehicles operating in year 2003.

TAC emissions. In addition, the Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. Based on the temporary and short-term construction schedule and required regulatory compliance, impacts would be less than significant.

(b) Operations

The SCAQMD recommends that a health risk assessment (HRA) be conducted for substantial sources of diesel particulates (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.³⁷ The CARB siting guidelines, *Air Quality and Land Use Handbook*,³⁸ which the SCAQMD cites in its own guidelines, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (May 2005), defines a warehouse as having more than 100 truck trips or 40 refrigerated truck trips per day. The Project would generate minor amounts of diesel emissions from delivery trucks and incidental maintenance activities. Trucks would comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce PM and NO_x emissions from existing diesel trucks. The Project would not generate diesel emissions equivalent to 100 or more truck trips per day. Therefore, the Project would not be considered a substantial source of diesel particulates.

In addition, typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, automotive repair facilities, and dry cleaning facilities. The Project does not propose these activities on site. Minimal emissions of air toxics may result from maintenance, such as from the use of architectural coatings and other products. Toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed land uses within the Project Site. The Project would also not introduce new sensitive (residential, school) uses near existing sources of TACs. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be less than significant.

(7) Odors

Threshold AQ-9: A significant impact would occur if the Project has the potential to create, or be subjected to, an objectionable odor that could impact a substantial number of sensitive receptors.

Impact Statement AQ-9: *Construction and operation of the Project would not generate substantial odorous emissions. Construction equipment would comply with CARB anti-idling regulations to minimize diesel emissions. Architectural coatings would comply with CARB and SCAQMD regulations regarding VOC content. During operations, food would be prepared in indoor kitchen areas, and refuse would be disposed of in accordance with applicable regulations. As a result, the Project would not create objectionable odors affecting a substantial number of people, and impacts would be less than significant.*

³⁷ South Coast Air Quality Management District, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions*, December 2002.

³⁸ California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective*, 2005.

(a) Construction

Potential activities that may emit odors during construction activities include the use of architectural coatings and solvents and the combustion of diesel fuel in on- and off-road equipment. As discussed in Subsection 2.b.(3)(a)(iii), SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, the Project would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD Rules, no construction activities or materials are expected to create objectionable odors affecting a substantial number of people. Therefore, construction of the Project would result in less than significant impacts.

(b) Operations

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any uses identified by the SCAQMD as being associated with substantial odors. Operation of the Project could include potential sources of odors associated with the preparation and disposal of food products. However, food would be prepared and disposed of in accordance with local regulations relating to ventilation control and refuse disposal. In addition, the food would normally be prepared within an enclosed kitchen area and not outdoors. Therefore, it is unlikely for substantial nuisance odors to permeate to the outside environment. It is assumed that the restaurant uses may charbroil meat during food preparation. Such charbroiling activities would be required to comply with applicable provisions of SCAQMD Rule 1138, which requires the control of smoke (PM₁₀ and PM_{2.5}) and gas (VOCs) generated by the cooking of meat. Compliance with Rule 1138 would reduce the emissions of odorous compounds. As a result, the Project is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. Therefore, the Project would not create adverse odors affecting a substantial number of people and impacts would be less than significant.

e. Cumulative Impacts**(1) Construction**

A number of related projects in the Project area have not yet been built or are currently under construction. Since the Applicant has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple and concurrent construction projects would be speculative. For this reason, the SCAQMD's methodology to assess a project's cumulative impact differs from the cumulative impacts methodology employed elsewhere in this Draft EIR.

With respect to the Project's short-term construction-related air quality emissions and cumulative conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. As such, construction of the Project would comply with SCAQMD Rule 403 requirements and the ATCM to limit heavy duty diesel motor vehicle idling to no more than five minutes at any given time. In addition, the Project would utilize a construction contractor(s) that complies with required and applicable BACT and the In-Use Off-Road Diesel Vehicle Regulation. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be

imposed on construction projects in the Air Basin, which would include each of the related projects in the Project area. As shown above in Table 4.B-4 and Table 4.B-6, regional and localized construction emissions associated with the Project would not exceed the SCAQMD numeric indicators. Since construction would not exceed the regional numeric indicator of significance for criteria pollutants, the Project would result in a less than significant impact with regard to cumulative construction emissions.

(2) Operations

The SCAQMD's approach for assessing cumulative impacts related to operations or long-term implementation is based on attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. As discussed earlier, the SCAQMD has developed a comprehensive plan, the AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or State nonattainment pollutant. Because the Los Angeles County portion of the Air Basin is currently in nonattainment for ozone, PM₁₀, and PM_{2.5}, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, Section 15064(h)(3) of the CEQA *Guidelines* provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency...

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2012 AQMP. As described above, the Project would not conflict with or obstruct implementation of AQMP and thus would be consistent with the growth projections in the AQMP.

Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As discussed above, peak daily operation-related emissions for the Project would exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, the proposed Project would result in an addition of criteria pollutants such that cumulative impacts, in conjunction with related projects in the region, would occur. Therefore, the emissions of nonattainment pollutants and precursors generated by Project operation in excess of the SCAQMD project-level thresholds would be cumulatively significant.

(3) Consistency with General Plans

(a) Consistency with County of Los Angeles General Plan

With respect to air quality, the pertinent County General Plan policy recommends strict regulation of mobile and stationary sources as well as vanpooling, carpooling and improved public transportation. The Project would comply with applicable air quality rules and regulations, and would implement a number Project Design Features, as set forth in Section 4.F, Greenhouse Gas Emissions, of this Draft EIR, that would reduce the generation of criteria pollutant. Several transit options are available in the Project vicinity as an alternative to private vehicles. The Project would allow for nearby residents to find goods and services in their immediate vicinity. Finally, the Project would provide the Code-required amount of short- and long-term bicycle parking as well as amenities such as lockers and showers. Accordingly, the Project would be consistent with General Plan policy concerning Project sources of stationary and mobile emissions as well as alternatives to private vehicle use.

(b) Consistency with City of Industry General Plan

As a portion of the Project is also located within the City of Industry, City's General Plan also defines policies relevant to air quality. **Table 4.B-8, Comparison of the Project to Applicable Air Quality Policies of the General Plan (City of Industry)**, evaluates the consistency of the Project with the applicable air quality goals, objectives, and policies in the Resource Management Element of the General Plan.

4. MITIGATION MEASURES

a. Construction

Construction emissions from the Project would not exceed SCAQMD significance thresholds. With implementation of the Project Design Features provided in this section, the Project would have less than significant impacts on air quality with regard to Project construction emissions. No mitigation measures are required during construction activities.

b. Operations

As discussed above, operation of the proposed Project would cause emissions of VOC and NO_x to exceed the SCAQMD regional daily thresholds. It should be noted that the scenarios analyzed presented conservative, worst-case emissions and that numerical exceedances of mass emissions thresholds do not equal a violation of ambient air quality standards. Localized impacts from emissions of CO—the pollutant of greatest concern—would be less than significant, as mentioned above.

The Project would incorporate a Project Design Feature to meet requirements of LEED Silver certification, which would reduce energy usage (natural gas and electricity) and associated emissions. As shown on Table 4.B-7, the majority of emissions associated with the operation of the Project are from vehicles access the site to work, shop, dine, or visit the commercial and hotel uses. Vehicle trip reductions due to internal capture (resulting from the co-location of mixed uses) or reliance on mass transportation have already been accounted for in the mobile source emission calculations. Thus, no additional feasible mitigation measures are available to further reduce emissions.

Table 4.B-8

Comparison of the Project to Applicable Air Quality Policies of the General Plan (City of Industry)

Recommendation	Analysis of Project Consistency
Air Quality Element	
Goal RM2: Improved air quality and reduced greenhouse gas emissions	Consistent. The Project would incorporate Project Design Features which serve to reduce criteria pollutants and greenhouse gas emissions.
Policy RM2-1: Comply with State Building Codes relative to indoor air quality.	Consistent. The Project would incorporate Project Design Features that would meet and exceed the applicable requirements of the State of California Green Building Standards Code.
Policy RM2-2: Support efforts to reduce pollutants to meet State and federal Clean Air Standards.	Consistent. The Project analysis of potential air quality impacts relied upon the numeric indicators established by the SCAQMD, which considers attainment of the ambient air quality standards. The Project also incorporates Project characteristics that would reduce land use planning-related air pollutant emissions consistent with recommended strategies from the CAPCOA (see Section 4.F, Greenhouse Gas Emissions, of this Draft EIR, for additional information regarding the CAPCOA recommended strategies).
Policy RM2-3: Collaborate with the CARB and other agencies within the South Coast Air Basin to improve regional air quality and achieve GHG reduction targets.	Consistent. The Project would coordinate with appropriate regional agencies. The Project would comply with applicable CARB and SCAQMD air quality rules and regulations and submit air quality modeling files pertaining to the Draft EIR to the SCAQMD for review, as appropriate.
Policy RM 2-4: Prohibit siting of sensitive land uses within distances defined by CARB unless sufficient mitigation is provided.	Consistent. The Project would not site sensitive uses near major sources of pollution.

Source: PCR Services Corporation, 2015.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

a. Construction

Impacts would be less than significant for regional and localized construction emissions, and no mitigation measures would be required.

b. Operations

Implementation of the proposed Project Design Features would reduce operational VOC and NO_x emissions during Project operations. However, regional VOC and NO_x emissions would still potentially exceed the regional numeric indicator. In addition, regional NO_x emissions would also exceed significance thresholds during operation of Phase 1 uses when overlapping with Phase 2 construction activities, and would therefore be significant and unavoidable for the duration of grading activities for Hotel B, which are expected to last for several months. As long-term Project operational emissions following Phase 2 buildout would continue to exceed significance thresholds as the result of Project trips, the Project would result in a significant and unavoidable impact with regard to operational emissions.

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4.C BIOLOGICAL RESOURCES

1. INTRODUCTION

This section describes biological resources that occur or have the potential to occur on the Project Site or in the Site vicinity. In addition, a description of applicable regulations is provided. The analysis evaluates the potential impacts to biological resources that could occur in association with implementation of the Project. The analysis in this section is based on Project Site visits made on June 18, 2015 and August 10, 2015.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Project Site and Vicinity

The topography on the Project Site is generally flat, and elevations range from the lowest of approximately 432 feet above mean sea level (AMSL) near the northwest boundary, to a height of approximately 471 feet AMSL near the southeast corner of the Project Site. The only soil type mapped in the Project area is the Urban Land-Sorrento-Hanford series.

The Project Site is immediately surrounded by urban development in all directions, with commercial and industrial areas to the north, east, and west and residential areas to the south, south of the Pomona Freeway (SR-60). The UPRR/Metrolink railroad tracks run in an east-west direction directly north of the Project Site and SR-60 is to the south, separating the Site from the residential areas of Rowland Heights.

(2) Methodology

(a) Field Investigation

A general biological field assessment and special-status plant survey were conducted by PCR biologist Dr. Daryl Koutnik on June 18, 2015. The observed vegetation communities, jurisdictional features, and other biological features or species observations of interest were mapped on aerial photographs. Survey coverage of the entire Project Site was ensured using the aerial photographs, with special attention to sensitive habitats or jurisdictional features. All accessible portions of the 14.84-acre Project Site were walked, and special-status plants (if observed) were documented on a 1" = 100' scale aerial photograph. The general methods for these field investigations are described in detail below. PCR Principal Regulatory Specialist Amir Morales and Biologist Lauren Singleton conducted a jurisdictional delineation on August 10, 2015.

(b) Jurisdictional Features

During the general biological assessment conducted on June 18, 2015, jurisdictional features present on the Project Site were noted as drainages, as shown in **Figure 4.C-1, Plant Communities and Land Uses**. A formal delineation of jurisdictional features was conducted on August 10, 2015, as shown in **Figure 4.C-2, Jurisdictional Features**. A brief description of potential jurisdictional features is provided below.

A single drainage occurs on the Project Site, the two segments of which are referred to as Drainage A and Drainage A1, which are connected by a culvert beneath a former farm road. Both drainage segments are soft-bottom and occur in the northern portion of the Project Site. The drainage generally flows east to west until it exits the Project Site, at which point flows are discharged off site (westerly) into an underground City of Industry-owned and maintained storm drain, eventually connecting downstream to Walnut Creek, which ultimately drains into the San Gabriel River.

Drainage A runs parallel to the northern Project boundary for approximately 631 feet, exiting the Project Site at its northwest corner. This length is inclusive of concrete/grouted riprap and culverts. A temporary detour road, installed through the center of the Project Site in conjunction with the Nogales Street Grade Separation Project, bisects Drainage A. Two associated culverts were installed to allow water flows to pass under the detour road.

Drainage A1 accepts discharge from an underground storm drain that daylights on the Project Site at its eastern boundary, and conveys stormwaters and urban runoff from upstream sources (to the south) for approximately 190 feet in a curved alignment in the Project Site's northeastern corner, where it meets Drainage A at the culvert beneath the unpaved road.

(c) Biological Resource Assessment

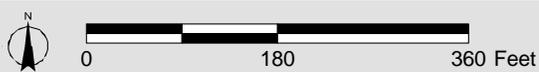
Plant community boundaries were delineated directly on the aerial photograph while in the field. Plant community boundaries were then digitized using Geographic Information System (GIS) technology to calculate acreages. Plant community names and hierarchical structure follows the California Department of Fish and Game (CDFG) *List of Vegetation Alliances and Associations* (2010) where such plant communities are consistent. Plant community descriptions were based on PCR findings and descriptions contained in Sawyer, Keeler-Wolf and Evens *A Manual of California Vegetation, second edition* (2011), if such exists for the highly disturbed plant communities occurring on the Project Site. Scientific names are employed upon initial mention of each species; common names are employed thereafter.

All plant species observed were identified and recorded in field notes or collected and later identified using taxonomic keys. Plant taxonomy follows Baldwin (2012).

All wildlife species observed during the field investigation by sight, call, tracks, nests, scat (fecal droppings), remains, or other sign were recorded. Binoculars and taxonomic keys were utilized in the field for the identification of wildlife, as necessary. Wildlife taxonomy follows Stebbins (2003) for amphibians and reptiles, the Kaufman (2000) for birds, and Jameson and Peeters (1988) for mammals.

(3) Plant Communities and Land Uses

Descriptions of the plant communities and land uses mapped within the Project area are included below. Locations of each of the plant communities and land uses are shown in Figure 4.C-1, and acreages are summarized in **Table 4.C-1**, *Plant Communities and Land Uses*.



Plant Communities and Land Uses

Rowland Heights Plaza and Hotel Project
 Source: Google Earth, 2014-04-23 (Aerial); PCR Services Corporation, 2015.

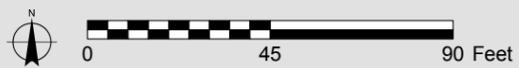
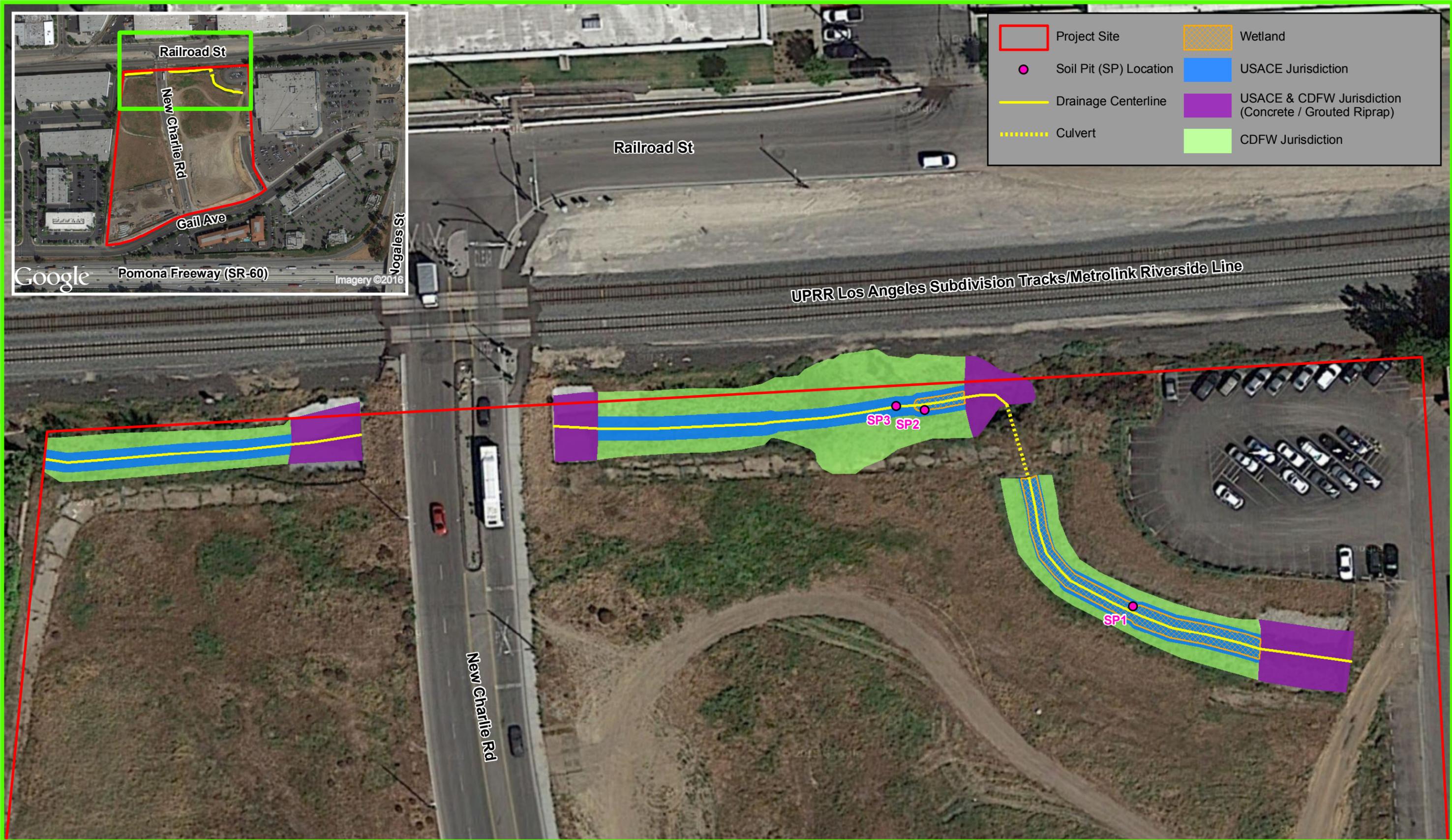
FIGURE

4.C-1

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Project Site	Wetland
Soil Pit (SP) Location	USACE Jurisdiction
Drainage Centerline	USACE & CDFW Jurisdiction (Concrete / Grouted Riprap)
Culvert	CDFW Jurisdiction



Jurisdictional Features

Rowland Heights Plaza and Hotel Project
 Source: Google Maps, 2015 (Aerial); PCR Services Corporation, 2015.

FIGURE
4.C-2

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Table 4.C-1

Plant Communities and Land Uses

Plant Community	Acres
Drainages	0.40
Ruderal	8.23
Developed	
Access Driveway	0.34
Bypass Road	0.98
Parking Lot	0.33
Disturbed	
Construction Staging Area	2.22
Stockpile Area	2.35
Total	14.85

Source: PCR Services Corporation, 2015.

(a) Drainages

A single jurisdictional drainage, designated as Drainage A and A1, occurs on the Project Site, as described in Subsection 2.a.(2)(b) above. Within the open portions of the channel, a variety of native and non-native riparian/wetland species occurs. Native species include two black willows (*Salix gooddingii*), one red willow (*Salix laevigata*), and a southern California black walnut (*Juglans californica*) growing within Drainage A. A small (0.01 acres), isolated patch of broadleaf cattail (*Typha latifolia*) occurs in the downstream portion of Drainage A1, just upstream from the culvert that connects Drainage A1 to Drainage A, along with marsh purslane (*Ludwigia peploides*). Non-native species include shamel ash (*Fraxinus uhdei*), flaxleaved fleabane (*Erigeron bonariensis*), Mexican fan palm (*Washingtonia robusta*), and castor bean (*Ricinus communis*). Since the drainage channel is cleared periodically to maintain stormwater capacity, the channel currently provides little water quality stormwater function. The drainages occupy a total of roughly 0.40 acres of the northern portion of the Project Site.

(b) Ruderal

Ruderal vegetation is found in areas heavily disturbed by human activities, such as roadsides, graded fields, former agricultural areas, or dump sites, and frequently the plants are introduced as a consequence of the activity. Ruderal areas comprise the majority of the Project Site; the community is dominated by wild radish (*Raphanus sativus*), tree tobacco (*Nicotiana glauca*), and nettle-leaved goosefoot (*Chenopodium murale*). Other species include primarily non-native species such as glaucous foxtail barley (*Hordeum murinum*), ripgut grass (*Bromus diandrus*), Johnson grass (*Sorghum halepense*), Russian thistle (*Salsola kali*), shortpod mustard (*Hirschfeldia incana*), prickly lettuce (*Lactuca serriola*) and slender wild oat (*Avena barbata*). A few native species also are present, including American bird's-foot trefoil (*Acmispon americanus*), alkali mallow (*Malvella leprosa*), Jimson weed (*Datura wrightii*), telegraph weed (*Heterotheca grandiflora*), Canadian horseweed (*Erigeron canadensis*), and narrowleaf milkweed (*Asclepias fascicularis*). Ruderal areas occupy approximately 8.23 acres.

(c) Developed

Developed areas lack vegetation and consist of man-made structures such as paved roadways, parking lots, and buildings. Developed areas include the access driveway, the bypass road, and the parking lot. These areas are described in further detail below.

(i) Access Driveway

The paved access driveway is located in southeastern corner of the Project Site, which is a paved driveway that accesses the adjacent commercial uses and currently allows construction machinery a point of access into the Project Site. The access driveway occupies approximately 0.34 acres.

(ii) Bypass Road

The paved bypass road bisects the entire Project Site in a north-south direction. The bypass road was developed to provide an alternate route during ongoing construction on Nogales Street Grade Separation Project and connects Railroad Street to Gale Avenue. The bypass road occupies approximately 0.98 acres of the Project Site.

(iii) Parking Lot

The paved parking lot that provides overflow parking for the adjacent commercial uses is in the northeastern corner of the Project Site and occupies approximately 0.33 acres.

(d) Disturbed

Disturbed habitat has been physically disturbed and is no longer recognizable as a native or naturalized vegetation association. Disturbed areas on the Project Site lack vegetation and are composed of nonpaved areas. There are two distinct disturbed areas: the construction staging area and the stockpile area, both associated with the Nogales Street Grade Separation Project. These areas are described in further detail below.

(i) Construction Staging Area

The construction staging area is located in the southwestern corner of the Project Site and is primarily for storage of construction machinery and equipment while the property is used during the Nogales Street Grade Separation Project. The construction staging area comprises approximately 2.22 acres.

(ii) Stockpile Area

The stockpile area is located in the southeastern portion of the Project Site and is currently used for temporary storage of excavation materials removed from the Nogales Street Grade Separation Project. The construction staging area comprises approximately 2.35 acres.

(4) Sensitive Plant Communities

A review of the most current edition of California Department of Fish and Wildlife (CDFW) *List of Vegetation Alliances and Associations* developed for the California Natural Diversity Database (CNDDDB) (CDFG 2010) and the *County of Los Angeles Oak Woodlands Conservation Management Plan* (County 2011) was conducted

to determine if any of the plant communities mapped within the Project Site are considered "rare and worthy of consideration" by lead and trustee agencies when reviewing project-related impacts assessed in environmental documents. The Project Site does not support any plant communities considered sensitive by CDFW or the County of Los Angeles.

(5) Special-Status Species

During the June 18, 2015 Site visit, only a single special-status species, the southern California black walnut, was observed on the Project Site. A single individual of southern California black walnut, a California Native Plant Society (CNPS) Rank 4 species (see Subsection 3.c.(1) below), was found growing within the northern drainage channel within a cluster of native willow trees. No special-status wildlife species were observed on the Project Site, and it is assumed that the Site does not support habitat for any special-status wildlife species considering the disturbed condition of the biological habitats.

b. Regulatory Framework Summary

(1) Federal

(a) Endangered Species Act

The federal Endangered Species Act (ESA) protects plants and wildlife that are listed as endangered or threatened by the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS). ESA Section 9 prohibits the taking of endangered wildlife, where taking is defined as to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct" (50 Code of Federal Regulations [CFR] 17.3). For plants, this statute governs removing, possessing, maliciously damaging, or destroying any endangered plant on federal land, as well as removing, cutting, digging up, damaging, or destroying any endangered plant on nonfederal land in knowing violation of state law. Under ESA Section 7, agencies are required to consult with the USFWS or NMFS if their actions, including permit approvals or funding, could adversely affect an endangered species (including plants) or its critical habitat. Through consultation and the issuance of a biological opinion, the USFWS or NMFS may issue an incidental take statement allowing take of the species that is incidental to another authorized activity, provided the action will not jeopardize the continued existence of the species. In cases where the federal agency determines its action may affect, but would be unlikely to adversely affect, a federally listed species, the agency informally consults with the USFWS and/or NMFS. This informal consultation typically involves incorporating measures intended to ensure effects would not be adverse. Concurrence from the USFWS and/or NMFS concludes the informal process. Without such concurrence, the federal agency formally consults to ensure full compliance with the ESA.

(b) Clean Water Act

The federal Water Pollution Control Act Amendments of 1972 (33 United States Code [USC] 1251–1376), as amended by the Water Quality Act of 1987, and better known as the federal Clean Water Act (CWA), is the major federal legislation governing water quality. The purpose of the federal CWA is to "restore and maintain the chemical, physical, and biological integrity of the nation's waters." Discharges into waters of the United States are regulated under CWA Section 404. Waters of the United States include: 1) all navigable waters (including all waters subject to the ebb and flow of the tide); 2) all interstate waters and wetlands; 3) all other waters, such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, or natural ponds; 4) all impoundments of waters mentioned above; 5) all tributaries

to waters mentioned above; 6) the territorial seas; and 7) all wetlands adjacent to waters mentioned above. Important applicable sections of the CWA are discussed below.

- Section 303 requires states to develop water quality standards for inland surface and ocean waters and submit to the U.S. Environmental Protection Agency (USEPA) for approval. Under Section 303(d), the State is required to list waters that do not meet water quality standards and to develop action plans, called Total Maximum Daily Loads (TMDLs), to improve water quality.
- Section 304 provides for water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the State that the discharge will comply with other provisions of the CWA. Certification is provided by the respective Regional Water Quality Control Board (RWQCB). A Section 401 permit from the Los Angeles RWQCB would be required for the proposed Project if a Section 404 permit were required.
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredge or fill material) into waters of the United States. The NPDES program is administered by the RWQCB. Conformance with Section 402 is typically addressed in conjunction with water quality certification under Section 401.
- Section 404 provides for issuance of dredge/fill permits by the United States Army Corps of Engineers (USACE). Permits typically include conditions to minimize impacts on water quality. Common conditions include: 1) USACE review and approval of sediment quality analysis before dredging, 2) a detailed pre- and post-construction monitoring plan that includes disposal site monitoring, and 3) requiring compensation for loss of waters of the United States. The areas of the Project Site that occur below mean higher high water (MHHW) would be subject to regulation under Section 404.

(c) Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) prohibits take of nearly all native birds. Under the MBTA, “take” means to kill, directly harm, or destroy individuals, eggs, or nests, or to otherwise cause failure of an ongoing nesting effort.

(2) State

(a) California Endangered Species Act

The California Endangered Species Act (CESA) authorizes the California Fish and Game Commission (Commission) to designate endangered, threatened, and rare species and to regulate the taking of these species (California Fish and Game Code [FGC] Sections 2050–2098). The CESA defines endangered species as those whose continued existence in California is jeopardized. State-listed threatened species are those not presently facing extinction, but that may become endangered in the foreseeable future. FGC Section 2080 prohibits the taking of State-listed plants and animals. The California Department of Fish and Wildlife (CDFW, formerly the CDFG prior to January 1, 2013) also designates fully protected or protected species as those that may not be taken or possessed without a permit from the Commission and/or CDFW. Species designated as fully protected or protected may or may not be listed as endangered or threatened. When a species is both State- and federally listed, an expedited request for consistency with the USFWS biological opinion may be issued through a request for Section 2080.1 consistency determination.

(b) California Fish and Game Code

The FGC is implemented by the Commission, as authorized by Article IV, Section 20, of the Constitution of the State of California. FGC Sections 3503, 3503.5, 3505, 3800, and 3801.6 protect all native birds, birds of prey, and nongame birds, including their eggs and nests, that are not already listed as fully protected and that occur naturally within the State. Section 3503.5 specifically states that it is unlawful to take, possess, or destroy any raptors (e.g., hawks, owls, eagles, and falcons), including their nests or eggs. The CDFW is the State agency that manages native fish, wildlife, plant species, and natural communities for their ecological value and their benefits to people.

(c) California Native Plant Society

The CNPS is a private plant conservation organization dedicated to the monitoring and protection of sensitive species in California. CNPS has compiled an inventory comprised of the information focusing on geographic distribution and qualitative characterization of rare, threatened, and endangered vascular plant species of California. The list has served as a potential candidate list for listing as Threatened and Endangered by CDFW. CNPS has developed five categories of rarity, referred to as California Rare Plant Ranks (CRPRs), of which CRPRs 1A, 1B, 2A, and 2B are considered particularly sensitive:

- CRPR 1A Presumed Extirpated in California and either Rare or Extinct elsewhere
- CRPR 1B Plants Rare, Threatened, or Endangered in California and elsewhere
- CRPR 2A Presumed Extirpated in California, but more common elsewhere
- CRPR 2B Plants Rare, Threatened, or Endangered in California, but more common elsewhere
- CRPR 3 Plants about which we need more information – a review list
- CRPR 4 Plants of limited distribution – a watch list

The CNPS appends CRPR categorizations with “threat ranks” that parallel the ranks used by the CNDDB, and are added as a decimal code after the CRPR (e.g., CRPR 1B.1). The threat codes are as follows:

- 1 – Seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat)
- 2 – Fairly endangered in California (20 – 80% occurrences threatened)
- 3 – Not very endangered in California (<20% of occurrences threatened or no current threats known)

(3) County

(a) Significant Ecological Areas

The County of Los Angeles’s (County) Significant Ecological Area (SEA) Program began in 1980 with the adoption of SEAs as Special Management Areas in the Los Angeles County General Plan (existing General Plan). The objective of the SEA Program is to preserve the genetic and physical ecological diversity of the Los Angeles County by designing biological resource areas capable of sustaining themselves into the future. The SEA designation is given to land that contains irreplaceable biological resources, and includes undisturbed or lightly disturbed habitats that supporting valuable and threatened species, and linkages and corridors to promote species movement.

SEAs are not wilderness preserves, and much of the land within SEAs is privately held, used for public recreation, or abuts developed areas. The SEA Program is intended to ensure that privately held lands within the SEAs retain the right of reasonable use, while avoiding activities and developments that are incompatible with the long-term survival of the SEAs. The County has regulated development within the SEAs with the SEA Conditional Use Permit. The Project Site is not located within any designated SEA.

(b) Oak Tree Ordinance

The County Oak Tree Ordinance applies to all unincorporated areas of Los Angeles County. The Oak Tree Ordinance requires that a person shall not cut, destroy, remove, relocate, inflict damage, or encroach into the protected zone of any tree of the oak tree genus that is 25 inches or more in circumference (8 inches in diameter) as measured 4.5 feet above mean natural grade, or in the case of an oak with more than one trunk, whose combined circumference of any two trunks is at least 38 inches (12 inches in diameter) as measured 4.5 feet above mean natural grade (i.e., diameter at breast height [DBH]), or (b) any tree that has been provided as a replacement tree, without first obtaining an oak tree permit. There are no oak trees present; therefore, this ordinance does not apply.

(c) Oak Woodlands Conservation Management Plan

To further the County's compliance with Public Resources Code Section 21083.4, which provides for the conservation of oak woodlands, the County adopted the Los Angeles County Oak Woodlands Conservation Management Plan (OWCMP) in 2012. The OWCMP develops a consistent policy for the management of oak woodlands by providing a voluntary conservation strategy in order to meet the requirements of the California Oak Woodlands Conservation Act (AB 242). The OWCMP extends CEQA consideration of impacts to oak woodlands comprised of oaks greater than 5 inches at DBH and recognizes that conservation of oak woodland habitat extends beyond the protection of individual trees.

3. ENVIRONMENTAL IMPACTS

a. Thresholds of Significance

The potential for impacts related to biological resources is based on thresholds derived from the County's Initial Study Checklist questions, which are based, in part, on Appendix G of the State CEQA Guidelines. These questions are as follows.

4. Biological Resources. Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?
- b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?
- c) Have a substantial adverse effect on federally or state protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, and drainages) or waters of the United

- States, as defined by § 404 of the federal Clean Water Act or California Fish & Game code § 1600, et seq. through direct removal, filling, hydrological interruption, or other means?
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
 - e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or otherwise contain oak or other unique native trees (junipers, Joshuas, southern California black walnut, etc.)?
 - f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.56, Part 16), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, § 22.56.215), and Sensitive Environmental Resource Areas (SERAs) (L.A. County Code, Title 22, Ch. 22.44, Part 6)?
 - g) Conflict with the provisions of an adopted state, regional, or local habitat conservation plan?

The Initial Study determined that the Project would have no impact with respect to oak woodland or unique trees, local policies, or habitat conservation plans. Therefore, the environmental topics of local policies or habitat conservation plans are not evaluated in this EIR. However, based on a Site visit conducted on June 18, 2015, one single specimen of Southern California black walnut (a unique native tree) was identified. Therefore the potential impact on unique native trees is further evaluated in this EIR. .

Based on these factors, the Project would have a potentially significant impact related to biological resources if it would:

- BIO-1** Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.
- BIO-2** Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS.
- BIO-3** Have a substantial adverse effect on federally or State protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, and drainages) or waters of the United States, as defined by Section 404 of the federal Clean Water Act or California Fish and Game Code Section 1600, et seq. through direct removal, filling, hydrological interruption, or other means.
- BIO-4** Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- BIO-5** Convert oak woodlands (as defined by the State, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean

natural grade) or otherwise contain oak or other unique native trees (junipers, Joshuas, southern California black walnut, etc.).

b. Project Characteristics or Design Features

Because the entire Project Site would be developed for the Rowland Heights Plaza and Hotel Project, no native biological resources would remain. The Project Site is essentially completely disturbed as a result of past agricultural activities and the current Nogales Street Grade Separation Project construction. As such, no Project Design Features apply to the Project in regard to biological resources.

c. Project Impacts

(1) Special Status Species

Threshold BIO-1: A potentially significant impact on biological resources would occur if the Project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

Impact Statement BIO-1: *The Project Site does not support any candidate, sensitive, or special status wildlife species. A single individual of southern California black walnut (CNPS Rank 4) was observed growing within the northern drainage channel; however, the CNPS Rank 4 is a low-level watch list sensitivity, and removal of one specimen from a highly disturbed location would not be considered an adverse effect to the species. Therefore, Project impacts would be less than significant for special status species.*

The Project Site is heavily disturbed and dominated by non-native ruderal plant species. Because the Project Site is primarily vegetated by low-growing weedy species, few areas offer habitat for wildlife in general and special status species in particular. However, a single individual of southern California black walnut (CNPS Rank 4) was observed growing within the northern drainage channel. This individual native tree was growing among both native willows and non-native shamel ash, castor bean, and an adventitious peach (*Prunus persica*). The CNPS Rank 4 is a low-level watch list sensitivity, and removal of one specimen from a highly disturbed location would not be considered an adverse effect to the species. Due to the high level of disturbance, limited number of plant species, and lack of habitat on the Project Site, Project impacts would be less than significant for species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS during either Project construction or operations.

(2) Sensitive Plant Communities

Threshold BIO-2: A potentially significant impact on biological resources would occur if the Project would have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS.

Impact Statement BIO-2: *The Project Site does not support any sensitive plant communities. Therefore, Project impacts would be less than significant.*

While plant communities dominated by willows are identified as sensitive habitats by CDFW, the Project Site supports only a few willow trees within Drainage A, which in the past have periodically been removed to allow unimpeded flow within the northern drainage channel. The vegetation on Site is primarily composed of non-native weedy, ruderal species, none of which comprise a sensitive plant community. Therefore, Project impacts resulting from construction or operational activities to sensitive natural communities identified in local or regional plans, policies, and regulations or by CDFW or USFWS would be less than significant.

(3) Jurisdictional Resources

Threshold BIO-3: A potentially significant impact on biological resources would occur if the Project would have a substantial adverse effect on federally or State protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, and drainages) or waters of the United States, as defined by Section 404 of the federal Clean Water Act or California Fish and Game Code Section 1600, et seq. through direct removal, filling, hydrological interruption, or other means.

Impact Statement BIO-3: *The Project Site contains wetlands and supports jurisdictional waters of the U.S. and CDFW jurisdictional streambed and associated riparian habitat. Potentially significant impacts to wetlands could occur as the result of Project implementation.*

The Project Site supports a single drainage, comprised of segment Drainages A and A1, that totals approximately 0.40 acres of CDFW jurisdictional resources. A formal delineation of jurisdictional resources was completed and found 0.035 acres of wetland, 0.209 acres of USACE jurisdictional area, and 0.405 acres of CDFW jurisdiction. The preceding acreages include a 0.089 acre contribution of concrete/grouted riprap for both USACE and CDFW acreages. A total jurisdictional length of 631 feet was calculated, inclusive of 465 feet of drainage, 128 feet of concrete/grouted riprap, and 39 feet of culvert. The drainage is considered jurisdictional waters; therefore, potentially significant impacts to jurisdictional waters of the U.S. and CDFW jurisdictional streambed and associated riparian habitat would result from Project implementation. Additionally, a small patch of cattails (approximately 0.01 acres) located within the downstream portion of Drainage A1 was identified during the field investigation. The cattails are presumably considered a federally protected wetland and fall within the wetland delineated area. Impacts to jurisdictional waters and wetlands are considered potentially significant. The Project would replace the current open drainage channel with a buried storm drain, connecting the existing upstream storm drain that conveys storm flows to the Project Site with the downstream storm drain. As a consequence of constructing a new storm drain segment, the Project Site drainage would no longer support vegetation, including cattails. (It should be noted that the partially channelized drainage does not provide biofiltration because of the periodic channel clearing.) This is a potentially significant impact on protected wetlands.

Once the Project is constructed and the drainage replaced with a storm drain, the Project would not result in operational impacts to federally or State protected wetlands or waters.

(4) Wildlife Movement

Threshold BIO-4: A potentially significant impact on biological resources would occur if the Project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Impact Statement BIO-4: *The Project Site does not function as a regional or local wildlife movement corridor and would not substantially interfere with movement of native wildlife species. However, the Project Site contains vegetation suitable for nesting birds. Therefore, the Project may result in significant impacts to nesting bird species that are protected under the California Fish and Game Code and the MBTA if removal, clearing, or grubbing were to occur during the general avian nesting season (February 15 to August 31).*

(a) Wildlife Movement

The Project Site is currently an active construction site associated with the Nogales Street Grade Separation Project. In addition, the Project Site was disturbed by past agricultural activities, and the Site now supports mostly ruderal vegetation, with little native habitat. The Project Site is completely surrounded by urban development with the closest location suitable for wildlife being located about 1.5 miles to the south in the Puente Hills. The Project Site does not provide or function as a wildlife movement corridor or linkage because no wildlife habitats can be accessed from the Project location. Consequently, the Project would not impact the movement of any native resident or migratory fish or wildlife species, nor would it interfere with established native resident or migratory wildlife corridors. Therefore, impacts on wildlife movement would be less than significant.

(b) Migratory Species

The Project Site has the potential to support both songbird and raptor nests due to the presence of small trees, shrubs, and ground cover. Nesting activity typically occurs from February 15 to August 31 for songbirds and January 15 to August 31 for raptors. Disturbing or destroying active nests is a violation of the Migratory Bird Treaty Act (16 U.S.C. 703 et seq.). In addition, nests and eggs are protected under Fish and Wildlife Code Section 3503. The removal of vegetation during the breeding season is considered a potentially significant impact.

(5) Oak Woodlands or Unique Native Trees

Threshold BIO-5: A potentially significant impact on biological resources would occur if the Project would convert oak woodlands (as defined by the State, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or otherwise contain oak or other unique native trees (junipers, Joshuas, southern California black walnut, etc.).

Impact Statement BIO-5: *No oak trees are found on the Project Site, the only regulated tree species. However, development of the Project would result in the removal of one unique native tree, the southern California black walnut, within a highly disturbed area. Therefore, Project impacts to unique native trees would be less than significant.*

No oak trees grow within the boundaries of the Project Site. The northern drainage does contain one unique native tree, southern California black walnut, which was discovered during the June 18, 2015 Site visit. As previously described, removal of one specimen of a unique native tree from a highly disturbed location would be considered a less than significant impact.

d. Cumulative Impacts

Chapter 3.0, General Description of Environmental Setting, of this Draft EIR provides a list of projects that are planned or are under construction in the Project area. Three such related projects are located in the Project vicinity. All related projects are located within urbanized settings and contain little or no biological resources.

Considered together with the related project, the Project's contribution to cumulatively significant impacts on biological resources observed on the Project Site would be less than significant following implementation of the required mitigation measures. Because the Project Site was found not to support special status wildlife species, sensitive plant communities, or protected oak trees; nor function as a regional wildlife movement corridor, the potential for cumulative impacts with respect to these significance thresholds requires no further analysis. In addition, given that a single individual of the CNPS Rank 4 special status plant species (southern California black walnut) is on the Site, the Project-related removal of which was determined to be a less than significant impact. Since Project impacts are less than significant, cumulative impacts are also less than significant because they are not cumulatively considerable.

The proposed mitigation measures for jurisdictional drainages and nesting/migratory birds would result in less than significant impacts to these biological resources, and therefore impacts would not be considered cumulatively significant. A summary is provided below.

Jurisdictional Drainages: Impacts to jurisdictional features would be subject to permitting with the regulatory agencies, including USACE, RWQCB or CDFG. With the proposed mitigation and compliance with existing regulations through the permitting process, no net loss of drainages would occur since permits typically require a minimum of 1:1 mitigation-to-impact ratio, and impacts would not be considered cumulatively significant.

Nesting and Migratory Birds: Mitigation is proposed to require the permittee to conduct pre-construction nesting bird surveys if Project activities occur during the avian breeding season (February 1-August 31, and as early as January 1 for some raptors); this will avoid disturbance to any active nest. With this mitigation measure, no net loss to active bird nests would occur; thus, any impacts would not be considered cumulatively significant.

With the implementation of Project mitigation measures and compliance with existing regulations, there will be no cumulatively considerable impacts to special status plant species, special status wildlife species, sensitive plant communities, migratory or nesting birds, wildlife movement, jurisdictional features, or protected trees.

Thus, the Project would not have a cumulatively considerable contribution, when considered together with the related projects, to a cumulatively significant impact to biological resources.

4. MITIGATION MEASURES

The following mitigation measure is required to reduce impacts under Threshold BIO-3 to a less than significant level.

MM-BIO-1: Prior to the issuance of any grading permit for permanent impacts in the areas designated as jurisdictional features, the Project Applicant shall obtain a CWA Section 404 permit from the USACE, a CWA Section 401 permit from the RWQCB, and Streambed Alteration Agreement permit under Section 1602 of the California Fish and Game Code from the CDFW. The Project would impact: 1) 0.035 acres of federal wetland, 0.120 acres of USACE drainage, and an additional 0.089 acres of USACE concrete/grouted riprap for a total of 0.209 acres of USACE jurisdictional resources; and 2) 0.316 acres of CDFW drainage, and an additional 0.089 acres of CDFW concrete/grouted riprap, for a total of 0.405 acres of CDFW jurisdictional resources. The following would be incorporated into the permitting, subject to approval by the regulatory agencies:

- On- or off-site restoration or enhancement of USACE/RWQCB jurisdictional “waters of the U.S.”/“waters of the State” and wetlands at a ratio no less than 1:1 for permanent impacts, and for temporary impacts, restore impact area to pre-Project conditions (i.e., revegetate with native species, where appropriate). Off-site restoration or enhancement at a ratio no less than 1:1 may include the purchase of mitigation credits at an agency-approved off-site mitigation bank or in-lieu fee program within Los Angeles County.
- On- or off-site restoration or enhancement of CDFW jurisdictional streambed and associated riparian habitat at a ratio no less than 1:1 for permanent impacts, and for temporary impacts, restore impact area to pre-project conditions (i.e., revegetate with native species, where appropriate). Off-site restoration or enhancement at a ratio no less than 1:1 may include the purchase of mitigation credits at an agency-approved off-site mitigation bank or in-lieu fee program within Los Angeles County.

The following mitigation measure is required to reduce impacts under Threshold BIO-4 to a less than significant level.

MM-BIO-2: Prior to the issuance of any grading permit that would require removal of potential habitat for raptor or other bird nests, the Project Applicant shall demonstrate to the satisfaction of the County of Los Angeles that either of the following have been or will be accomplished:

- Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.

- If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning 30 days prior to the initiation of Project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 500 feet of the disturbance area. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of Project activities. If a protected native bird is found, the Project Applicant shall delay all Project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, Project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing shall be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the Project activities and the nest. Project personnel, including all contractors working on Site, shall be instructed on the sensitivity of the area. The Project Applicant shall provide the Department of Regional Planning the results of the recommended protective measures described above to document compliance with applicable State and federal laws pertaining to the protection of native birds.
- If the biological monitor determines that a narrower buffer between the Project activities and observed active nests is warranted, he/she shall submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the Project activities and the nest and foraging areas) to the Department of Regional Planning and, upon request, the CDFW. Based on the submitted information, the Department of Regional Planning (and the CDFW, if the CDFW requests) will determine whether to allow a narrower buffer.
- The biological monitor shall be present on Site during all grubbing and clearing of vegetation to ensure that these activities remain within the Project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to Project activities. The biological monitor shall send weekly monitoring reports to the Department of Regional Planning during the grubbing and clearing of vegetation, and shall notify the Department of Regional Planning immediately if Project activities damage active avian nests.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures MM-BIO-1 and MM-BIO-2, impacts associated with biological resources would be reduced to less than significant levels.

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4.D CULTURAL RESOURCES

4.D.1 ARCHAEOLOGICAL RESOURCES

1. INTRODUCTION

This section evaluates potential impacts on archaeological resources that could occur with implementation of the Project. The analysis and recommendations are based on a cultural resource records search conducted through the California Historical Resources Information System (CHRIS), South Central Coastal Information Center (SCCIC), a review of the Phase I Environmental Site Assessment (ESA),¹ the Geotechnical Report,² and the Updated Geotechnical Report³, a Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC), follow-up Native American consultation, and a pedestrian survey of the Project Site. The results of the SLF search and Native American consultation are included in Appendix C-1, Native American Consultation Documentation, of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Prehistoric Background (13,500 Years Before Present to 1769 A.D.)

Prehistoric archaeological resources identified in the greater urban Los Angeles area include remains with very old dates, such as the Los Angeles Man remains recovered in 1936 by Work Progress Administration workers digging a storm drain along the Los Angeles River. Radiocarbon dates have indicated an age greater than 20,000 years old, although a small amount of collagen tested from the remains makes the date suspect. The remains were found in association with mammoth bones, however, so the remains can be considered Pleistocene or early Holocene (i.e., 12,000 to 8,000 years before present) in age.⁴ One of the oldest sets of securely dated human remains discovered in North America, with an age between 13,000 and 13,500 years ago, were identified at Arlington Springs on Santa Rosa Island, which is located approximately 100 miles west-northwest of the Project Site.⁵

(a) Gabrielino

In the Project Site vicinity, prehistoric archaeological resources are most likely to represent past occupation by the Gabrielino (or Gabrieleño, Tongva, or Kizh). The Gabrielino occupied territory that included the Los Angeles Basin, the coast of Aliso Creek in Orange County to the south to Topanga Canyon in the north, the

¹ *Leymaster Environmental Consulting, LLC, Phase I Environmental Site Assessment Report, Vacant Lot, 18800 E. Gale Avenue, Rowland Heights, California, November 22, 2012 and included in Appendix A-2 of this Draft EIR*

² *Southern California Geotechnical, Geotechnical Investigation and Liquefaction Evaluation, Proposed Mixed Use Development, 18800 East Gale Avenue, Los Angeles County, California, February 3, 2014 and included as Appendix D-1 of this Draft EIR.*

³ *Southern California Geotechnical, Update of Geotechnical Report and Conceptual Grading Plan Review, Proposed Mixed Use Development, 18800 East Gale Avenue, Los Angeles County, California, September 10, 2014 and included as Appendix D-2 of this Draft EIR.*

⁴ *Moratto, Michael J., California Archaeology, 1984.*

⁵ *Johnson, John R., Thomas W. Stafford, Jr., Henry O. Ajie, and Don P. Morris, Proceedings of the Fifth California Islands Symposium, edited by David R. Brown, Kathryn C. Mitchell and Henry W. Chaney, 2002, pages 541-545.*

four southern Channel Islands, and watersheds of the Los Angeles, San Gabriel, and Santa Ana Rivers. The Gabrielino were not the first inhabitants of the Los Angeles Basin, but arrived around 500 B.C. The language of the Gabrielino people has been identified as a Cupan language within the Takic family, which is part of the larger Uto-Aztecan language family. Uto-Aztecan speakers arrived in Southern California in what is known as the Shoshonean migration, which current archaeological and linguistic evidence suggests originated in the Great Basin⁶ and displaced the already established Hokan speakers. The Gabrielino were advanced in their culture, social organization, religious beliefs, and art and material production. Class differentiation, inherited chieftainship, and intervillage alliances were all components of Gabrielino society.

Population estimates are based solely on estimates gleaned from historical reports. There were possibly more than 100 mainland villages, Spanish reports suggested village populations ranged from 50 to 200 people.⁷ Prior to actual Spanish contact the Gabrielino population had been decimated by diseases.⁸ The diseases were probably European diseases spread by early Spanish maritime explorers during coastal stopovers. The closest known Gabrielino village site to the Project Site is the village of *Awingna* located in the modern-day La Puente Valley, approximately four miles north of the Project Site.

(2) Historic Background (1769 to 1950 A.D.)

European contact with the Gabrielino that likely inhabited the Project Site and surrounding region began in 1542 when Spanish explorer, Juan Rodriguez Cabrillo, arrived by sea during his navigation of the California coast. In 1769, another Spanish explorer, Gaspar de Portola, passed through Gabrielino territory by land and interacted with the local indigenous groups. In 1771, Mission San Gabriel was established 15 miles northwest of the Project Site, and it slowly integrated the Gabrielino from the surrounding region. El Pueblo de La Reina de Los Angeles (i.e., the modern day City of Los Angeles) was established in 1781 approximately 20 miles west of the Project Site. Spanish soldiers and missionaries continued to travel through the area on their way to visit various missions and outposts in the vicinity. In the beginning of the nineteenth century, some Spaniards who had worked at the missions began to set up what would later be known as the Ranchos. The Rancho era in California history was a period when the entire State was divided into large parcels of land equaling thousands of acres apiece. These large estates were ruled over in a semi-feudal manner by men who had been deeded the land first by the Spanish crown, and later the Mexican government. In 1821, Mexico won independence from Spain and began to dismantle the mission system in California. As the missions began to secularize, they were transformed into small towns, and most Gabrielinos would later be marginalized into reservations or into American society. It was during this time that Americans began to enter California. Many American Californians married into the Rancho families, a development that would transform land ownership in Mexican California. By the time the United States annexed California after the Mexican-American War, much of the Rancho lands were already in the hands of Americans. Residential and commercial development of the immediate Project area was underway by the late nineteenth century.⁹

⁶ *The Great Basin is a desert region of the western United States comprising most of Nevada and parts of Utah, California, Idaho, Wyoming, and Oregon.*

⁷ *Bean, Lowell J., and C. R. Smith, Gabrielino, in R. F. Heizer (editor) Handbook of North American Indians, Vol. 8, California, 1978, pages 538-549.*

⁸ *Tac, Pablo, Conversion de los San Luisenos de Alta California, Proceedings of the 23rd International Congress of Americanists, 1930.*

⁹ *Leymaster Environmental Consulting, LLC, Phase I Environmental Site Assessment Report, op. cit. page 4.*

(a) John A. Rowland and the Community of Rowland Heights

John A. Rowland was an early settler and rancher of the eastern San Gabriel Valley area. He and his family were very prominent in the region's early development, and the unincorporated community of Rowland Heights, California is named for him. Rowland Heights is located in and below the Puente Hills in the San Gabriel Valley on the land formerly known as La Puente Rancho, a grant totaling nearly 49,000 acres and granted to the American settlers John Rowland and William Workman by the Mexican government in 1842. In 1851, Rowland and Workman decided to split the lands between themselves. Rowland took possession of 29,000 acres to the east and encompassing the proposed Project Site. Workman acquired the remaining lands to the west. Before 1960, the land is known to have been used for agricultural purposes and was dotted with a multitude of walnut, avocado, and citrus trees. By 1960, the area changed, with farms giving way to housing tracts¹⁰. The ranch of Rowland's grandson, John A. Rowland III encompasses the Project Site, and the Rowland family formerly owned part of that property until recently, leasing most of it for commercial use. The structures that once existed within the Project Site, as depicted in the historic aerials from 1928 to 2008, and referenced in the Project's ESA, are associated with John A. Rowland III's ranch complex, which included access roads, a farmhouse, and other ancillary structures. These structures were razed sometime between 2007 and 2008, as they are not depicted on aerial photographs after those years. In addition, the ESA report indicates that the Project Site is located within "a portion of the John A. Rowland 166.64-acre allotment of the partition of part of Rancho La Puente"¹¹.

(3) Resources Identified within the Project Site and Vicinity

(a) Methods

(i) Cultural Resources Records Search

On July 20, 2015, PCR archaeologists conducted a cultural resource records search at the CHRIS-SCCIC at California State University, Fullerton. This records search included a review of all recorded archaeological resources within a one-half mile radius of the Project Site, as well as a review of cultural resource reports and historic topographic maps on file. In addition, PCR reviewed the California Points of Historical Interest, the California Historical Landmarks, the California Register, the National Register, and the California State Historical Resources Inventory listings. The purpose of the record search is to determine whether previously recorded archaeological resources exist on the Project Site and surrounding vicinity that require evaluation and treatment. The results also provide a basis for assessing the sensitivity of the Project Site in regards to the potential for encountering additional archaeological resources.

(ii) Sacred Lands File Search and Native American Consultation

On July 23, 2015, PCR archaeologists commissioned a SLF records search through the NAHC and conducted follow-up consultation with Native American groups and/or individuals (on August 12, 2015) identified by the NAHC as having affiliation with the Project Site vicinity. Each Native American group and/or individual listed was sent a Project notification letter and map, and was asked to convey any knowledge regarding Native American cultural resources (archaeological sites, sacred lands, or artifacts) located within the Project Site or surrounding vicinity. The letter included information such as Project location and a brief

¹⁰ *Rowland Heights Community Newsletter, 2007. Accessed online, September 2015: <http://ceo.lacounty.gov/OUAS/pdf/Community%20Connection/07/Rowland%20Heights.pdf>*

¹¹ *Leymaster Environmental Consulting, LLC, Phase I Environmental Site Assessment Report, op. cit. page 4.*

description of the proposed Project. The purpose of the search and follow-up consultation is to obtain information regarding the nature and location of additional prehistoric or Native American resources whose records may not be available at the CHRIS-SCCIC.

(iii) Pedestrian Survey

On August 10, 2015, PCR archaeologists conducted a cultural resources pedestrian survey of the Project Site. The pedestrian survey consisted of transect intervals spaced approximately 33 to 49 feet apart. Detailed notes and digital photographs were taken of the Project Site and surrounding vicinity. Ground visibility, disturbances, and survey coverage information is provided in the results section, below.

(b) Results

(i) Cultural Resources Records Search

Results of the records search revealed that 17 cultural resource studies have been previously conducted within the one-half mile radius of the Project Site. Two of the 17 studies encompassed a small portion of the Project Site (southernmost area) and did not identify any new resources within the Project Site. Three cultural resources (P-19-186112, 19-000179, and 19-001044) have been recorded within a one-half mile of the Project Site. Resource 19-186112 is a built-environment resource and is described as the Union Pacific Railroad located immediately adjacent to the northern portion of the Project Site.¹² Resource 19-000179 is a prehistoric archaeological site located approximately 500 feet north of the Project Site and is described as lithic waste flakes, a flake scraper, and a mano.¹³ According to the latter resource's Department of Parks and Recreation (DPR) Site Form, it appears to no longer exist due to road and commercial construction in the area where it was originally mapped.¹⁴ Resource 19-001044 is a prehistoric archaeological site situated approximately 1,500 feet northwest of the Project Site and is composed of midden/habitation debris on the slopes of a knoll adjacent to San Jose Creek. The DPR Site Form for the resource indicates that there was a possibility for the site to be destroyed as the area was being slated for construction.¹⁵ Lastly, another prehistoric archaeological resource (19-001045) was also recorded immediately outside of the one-half mile radius and is described as consisting of two separate loci - Locus A and Locus B. Locus A is described as an area that has surface exposures of a midden-like soil associated with ground stone and a lithic scatter. Locus B is described as ground stones and mortar fragments.¹⁶

(ii) Sacred Lands File Search and Native American Consultation

On August 12, 2015, pursuant to NAHC suggested procedure, follow-up letters were sent via certified mail to the eight Native American individuals and organizations (for which addresses were available) and via email to one Native American individual (for which only an email address was available), as identified by the NAHC as being affiliated with the vicinity of the Project Site. As of September 3, 2015, PCR has received a response from Mr. Andrew Salas of the Gabrieleño Band of Mission Indians-Kizh Nation and Mr. John Tommy Rosas of the Tongva Ancestral Territorial Tribal Nation. On August 12, 2015, Mr. Rosas replied via email asking for

¹² Ashkar, S., DPR Site Form for 19-186112, 1999. Record on file at the SCCIC.

¹³ A mano is a prehistoric stone tool that fits in the palm of one's hand and was used to grind seeds, acorns, and other plant materials.

¹⁴ Blackburn, T., DPR Site Form for 19-00179, 1967. Record on file at the SCCIC.

¹⁵ Colquehoun, Carole, DPR Site Form for 19-001044. Record on file at the SCCIC.

¹⁶ Colquehoun, Carole, DPR Site Form for 19-001045. Record on file at the SCCIC.

additional information regarding the Project and the contact information for the County Planner for the Project. A response by PCR was provided on August 31, 2015.

Mr. Salas responded via email on August 23, 2015 and requested formal consultations with the Lead Agency pursuant to Assembly Bill 52. He also recommended that a Native American monitor be present during construction excavations associated with Project implementation. PCR submitted a response via email on September 8, 2015.

No other responses have been received from the Native American community. Copies of the correspondence between PCR and the NAHC and the individual Native American groups are provided in Appendix C-1 of this Draft EIR.

(iii) Pedestrian Survey

The pedestrian survey revealed that the Project Site has been bisected into an eastern and western section by a recently-paved detour road—New Charlie Road—between Gale Avenue and Railroad Street. Other disturbances to the Project Site include a parking lot on the northeast corner, an active construction storage yard on the southwest corner, a paved access road (which leads to a shopping center) on the southeast corner, and a concrete ditch which follows on a north-south direction along the western edge of the Project Site. The pedestrian survey also revealed that the southeast portion of the Project Site has been previously graded and or cleared, and that dirt paths lead onto the northeast portion of the Project Site. A partially channelized storm drain crosses the northeastern and northern portions of the Project Site. PCR surveyed approximately 85 percent of the Project Site since access to the construction storage yard area was denied. However, this area was viewed by PCR from outside the fence that bordered the yard and it appeared to have been previously graded and or cleared. PCR observed no resources on the surface from outside the fence. The remaining areas of the Project Site (outside of the construction storage yard) were covered in seasonal grasses or had been previously cleared (southeast portion). Rodent burrowing and modern cultural materials (clothes, blankets, plastics, paper scraps, metal posts, glass fragments, butchered cow bone, etc.) was observed throughout the Project Site. Ground surface visibility for all areas within the Project Site (except for the southeast portion which had been previously cleared and the construction storage yard) was poor (i.e., zero to 25 percent visibility) due to grasses that covered the ground surface. During the pedestrian survey, two historic period archaeological resources (RH-Brick Scatter and RH-Concrete Chunks) and two built-environment resources (RH-Road and RH-Fence) were identified. These resources are described in detail below. No prehistoric archaeological resources were identified during the pedestrian survey.

RH-Brick Scatter

This resource consists of a scatter of whole red bricks and red brick fragments (n=30) without maker's marks. The scatter was identified along a sloping hill on the northeast portion of the Project Site and east of the existing detour road. The scatter measures approximately 100 feet long (north-south) and eight feet wide (east-west). It is possible that the brick scatter is associated with the structures that once existed on the Project Site, as depicted in the historic aerials from 1928 to 2008, and referenced in the Project's ESA.

RH-Concrete Chunks

This resource consists of concrete foundation chunks found along a dirt road, east of the detour road (between Gale Avenue and Railroad Street) and on the northeastern portion of the Project Site. The concrete chunks were found in an area measuring approximately 26 feet long by approximately seven feet wide. Items found associated with this resource include several red brick fragments (without maker's marks), clear glass fragments, butchered animal bone, and a turquoise-glazed ceramic fragment. This portion of the Project Site also exhibited major disturbances from rodent burrowing, and grasses that covered the ground surface at the time of PCR's pedestrian survey.

RH-Road

This resource consists of an older asphalt paved road which starts on the northeast portion of the Project Site, just west of an existing parking lot (approximately 50 feet south of the Union Pacific Railroad [UPRR] tracks) and follows east until it reaches a modern detour route (between Gale Avenue and Railroad Street). RH-Road starts again on the west side of the detour road (50 feet south of UPRR) and follows west until almost reaching the western edge of the property where it turns south for approximately 300 feet. From that point, RH-Road continues east for about 180 feet where it terminates. Based on a review of the historic aerials found on the ESA for the Project, RH-Road was present at least since 1928. Originally, RH-Road commenced at the intersection with Nogales Street and followed west until the western edge of the property, then south, and finally east until reaching the once existing properties at the Project Site. The historic aerials from Nationwide Environmental Title Research, LLC (NETR) Online indicate that sometime between 1980 and 1995, the northeasternmost portion (outside of the Project Site) was destroyed by development. Review of Google Earth images from 2012 indicates that RH-Road within the Project Site was intact at that time. However, by 2013, the modern detour road was constructed, cutting the northernmost portion of RH-Road in half. Some portions of RH-Road were noted as being covered by grasses during the pedestrian survey, and some portions have been deteriorated in several areas.

RH-Fence

This resource consists of a dilapidated and incomplete L-shaped wood post and barbed wire fence located on the western half of the Project Site. The remaining portion of resource RH-Fence is located immediately next to the western section of RH-Road. During the pedestrian survey, the ground surface surrounding the resource was covered in grasses.

Resource Associations

Based on information acquired from the ESA and historic aerial photography review, the four aforementioned historic period resources identified by PCR during the pedestrian survey appear to be associated with the former structures depicted in the historic aerials from 1928 up to 2008 that were razed sometime between 2007 and 2008. The ESA also noted that the Project Site is located within "a portion of the John A. Rowland 166.64-acre allotment of the partition of part of Rancho La Puente"¹⁷. Information gathered from the Rowland Heights Library indicated that these former structures were associated with the ranch of John A. Rowland's grandson, John A. Rowland III, and included access roads, a farmhouse, and other ancillary structures.

¹⁷ *Leymaster Environmental Consulting, LLC, Phase I Environmental Site Assessment Report, op. cit. page 4*

(iv) Evaluation of Resources within the Project Site**Methods**

As discussed above, PCR identified four historic period resources located within the Project Site (RH-Brick Scatter, RH-Concrete Chunks, RH-Road and RH-Fence). In order to determine whether the identified resources qualify as an archaeological or historical resource pursuant to Section 15064.5 of the State *CEQA Guidelines*, PCR conducted an eligibility evaluation of the four resources identified within the Project Site. Evaluation of cultural resources is determined by conducting an “evaluation” of a resource’s eligibility for listing in the California Register (per CEQA), determining whether it qualifies as a “unique archaeological resource” (per CEQA), and determining whether the resource retains integrity. This is achieved by applying the California Register criteria (including criteria for a “unique archaeological resource” per CEQA) to the resources set out in the Subsection 2.a.(3), Resources Identified within the Project Site and Vicinity of this section. If a resource is determined eligible for listing or qualifies as a “unique archaeological resource”, then the resource is considered an archaeological or historical resource pursuant to State *CEQA Guidelines* Section 15064.5 and any substantial adverse change to the resource is considered a significant impact on the environment.

RH-Brick Scatter and RH-Concrete Chunks

Although it is likely that RH-Brick Scatter and RH-Concrete Chunks are associated with the former ranch of John A. Rowland III, PCR was unable to find information that suggested John A. Rowland III was an important person in the Rowland Heights region as his grandfather was. Moreover, these resources have more than likely been displaced from their original location and do not retain integrity. In addition, the resources are not associated with events that have made a significant contribution to the broad patterns of California’s history; are not associated with the lives of persons important in our past; do not embody characteristics of a type, period, region, or method of construction; do not represent the work of an important creative individual; and do not or are not likely to yield information important in history. As a result, the resources are not eligible for the California Register, nor do they qualify as unique archaeological resources and therefore they are not historical resources under CEQA.

RH-Road and RH-Fence

Although it is likely that RH-Road and RH-Fence resources are associated with the former ranch of John A. Rowland III, PCR was unable to find information that suggested John A. Rowland III was an important person in the Rowland Heights region as his grandfather was. The resources are not associated with events that have made a significant contribution to the broad patterns of California’s history; are not associated with the lives of persons important in our past; do not embody characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual; and are not likely to yield information important in history.

Moreover, RH-Road is in a deteriorating condition, and the northern portion has been destroyed within the Project Site for construction of a modern detour road between Gale Avenue and Railroad Street, while RH-Fence is in a dilapidated and incomplete condition along the northwest portion of the Project Site. Therefore, these resources do not retain integrity. As a result, the resources are not eligible for the California Register nor do they qualify as unique archaeological resources; therefore, they are not considered historical resources under CEQA.

b. Regulatory Framework Summary

(1) State

(a) California Register of Historical Resources

Created by Assembly Bill 2881, which was signed into law on September 27, 1992, the California Register of Historical Resources (California Register) is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”¹⁸ The criteria for eligibility for the California Register are based upon National Register criteria.¹⁹ Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.²⁰

To be eligible for the California Register, a prehistoric or historic property must be significant at the local, State, and/or federal level under one or more of the following criteria:

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

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register of Historic Places, but it may still be eligible for listing in the California Register.

(b) California Environmental Quality Act

CEQA requires lead agencies to determine if a proposed project would have a significant effect on archaeological resources (Public Resources Code Sections 21000 et seq.). As defined in Section 21083.2 of the Public Resources Code, a “unique” archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, and there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.

¹⁸ *California Public Resources Code, Section 5024.1(a).*

¹⁹ *California Public Resources, Code Section 5024.1(b).*

²⁰ *California Public Resources, Code Section 5024.1(d).*

- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

In addition, State *CEQA Guidelines* Section 15064.5 broadens the approach of classifying archaeological resources by using the term “historical resource” instead of “unique archaeological resource.” The State *CEQA Guidelines* recognize that certain archaeological resources may also have significance. The State *CEQA Guidelines* recognize that a historical resource includes: (1) a resource in the California Register of Historical Resources; (2) a resource included in a local register of historical resources, as defined in Public Resources Code Section 5020.1 (k) or identified as significant in a historical resource survey meeting the requirements of Public Resources Code Section 5024.1 (g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency’s determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of Section 21084.1 of the Public Resources Code and Section 15064.5 of the State *CEQA Guidelines* apply. If an archaeological site does not meet the criteria for a historical resource contained in the State *CEQA Guidelines*, then the site is to be treated in accordance with the provisions of Public Resources Code Section 21083.2, which refer to a unique archaeological resource. The State *CEQA Guidelines* note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (Section 15064.5(c)(4)).

(2) County

(a) Los Angeles County General Plan

The County of Los Angeles General Plan’s Conservation and Open Space Element (1980) indicates that the County has many archaeological sites from the Indian, Hispanic, and American periods. Prior to the arrival of the Europeans, the Native Americans had a complex culture as evidenced by archaeological finds. Evidence of the historic past is also available from missions, remains of the great ranchos, and historical trails/routes of early explorers. Due to insufficient funds, sites and structures are haphazardly protected. The General Plan mentions that programs and procedures are needed for the identification and protection of cultural resources, which includes archaeological resources.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of archaeological resources is based on a cultural resource records search conducted through CHRIS-SCCIC, a review of the ESA, the Geotechnical Report and Updated Geotechnical Report, a SLF search through the NAHC and follow-up Native American consultation, and a pedestrian survey of the Project Site. The records search and pedestrian survey reveal whether known or previously unknown archaeological resources, respectively, exist on the Project Site and in the surrounding vicinity that require evaluation and treatment. The sensitivity of the Project Site with respect to encountering previously unknown buried archaeological resources during construction was assessed based on the finding of the records search (i.e.,

proximity to known resources), pedestrian survey, SLF search and follow up consultation, depth and age of native versus fill soils, land use history, and proposed excavation parameters for the Project.

b. Thresholds of Significance

The potential for impacts to archaeological resources is based on thresholds derived from Los Angeles County Department of Regional Planning Initial Study Checklist screening questions, which are based in part on Appendix G of the State *CEQA Guidelines*. These questions are as follows:

5. Cultural Resources Would the project:

- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or contain rock formations indicating potential paleontological resources?
- d) Disturb any human remains, including those interred outside of formal cemeteries?

Based on these factors, the Project would have a potentially significant impact on archaeological resources if it would:

ARCHAEO-1: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State *CEQA Guidelines*.

ARCHAEO-2: Disturb any human remains, including those interred outside of formal cemeteries.

c. Project Characteristics or Design Features

Excavations for an underground storm drain, subterranean parking structures and building footings for the Project are expected to reach depths between five and 25 feet below existing grade.

The Geotechnical Report prepared for the Project indicates that during soil boring operations at the Project Site, artificial fill was encountered in several different areas at depths between 1.5 to 8.5 feet below the ground surface. Below the artificial fill, native colluvium was encountered throughout the Site between depths of 4.5 and 12± feet below existing grade. The colluvium consists of dark gray brown to black, medium stiff to hard silty clays. Alluvium was encountered beneath the fill and colluvium materials between depths of 14.5 and 47± feet. Bedrock of the Monterey Formation was found beneath the colluvium and alluvium deposits at most of the boring locations extending from depths of 4.5 to 47± feet.

d. Project Impacts

Threshold ARCHAEO-1 A potentially significant impact on archaeological resources would occur if the Project would cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State *CEQA Guidelines*.

Impact Statement ARCHAEO-1: *Implementation of the Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines.*

As discussed above, three cultural resources (P-19-186112, 19-000179, and 19-001044) have been recorded within a one-half mile radius of the Project Site: the Union Pacific Railroad and two prehistoric archaeological sites. These three resources are either located outside of the Project Site (19-186112) or far enough away that they would not be affected by the proposed Project. Two previous studies have encompassed a small portion of the Project Site, but these did not yield identification of resources within the Project Site. The pedestrian survey revealed that many areas of the Project Site had been previously disturbed for the construction of New Charlie Road, a temporary surface parking lot, a shared paved access road (with the adjacent Rowland Heights Plaza), a construction storage yard, a concrete ditch, and a partially channelized storm drain. In addition, the southeast portion of the Project Site appeared to have been previously graded and or cleared, and dirt access paths were observed in the northeast portion of the Project Site. No prehistoric archaeological resources were found.

Two historic archaeological resources (RH-Brick Scatter and RH-Concrete Chunks) and two built-environment resources (RH-Road and RH-Fence) were identified. These resources are not considered historical resources under CEQA, and impacts to them are not considered a significant impact on the environment. Therefore, no mitigation is warranted. Thus, the Project would not cause a substantial adverse change in the significance of an archaeological or historical resource, as defined in Section 15064.5 of the State *CEQA Guidelines*.

Prehistoric archaeological resources are known to have been recorded within the one-half mile radius of the Project Site, and the San Gabriel River is located one-quarter mile to the north. Although no prehistoric archaeological resources were encountered during the pedestrian survey, the fact that resources have been recorded nearby and given the presence of a fresh water resource near the Project Site (including a potential Waters of the U.S. feature within the Project Site) that would have attracted prehistoric inhabitants to the area, the potential to encounter buried archaeological resources during excavations at the Project Site (which could reach depths of between five and 25 feet below existing grade) is considered moderate to high. Therefore, impacts on unknown or buried archaeological resources are potentially significant.

Threshold ARCHAEO-2 A potentially significant impact on archaeological resources would occur if the Project would disturb any human remains, including those interred outside of formal cemeteries.

Impact Statement ARCHAEO-2: *Implementation of the Project could disturb human remains, including those interred outside of formal cemeteries.*

No known human remains have been identified from the CHRIS-SCCIC records for the Project Site or within a half-mile radius. The results of the pedestrian survey and SLF search did not reveal the existence of human remains within the Project Site or nearby. However, the Project Site is known to have been habited during the historic period, and Native Americans inhabited the region prior to European settlement. Thus, the findings do not preclude the existence of previously unknown human remains located below the ground surface that may be encountered during construction excavations associated with the Project. This is a potentially significant impact.

e. Cumulative Impacts

The three related projects identified in Chapter 3.0, are located south of the SR-60 and not contiguous with the Project Site. In addition, those projects with potential for substantial excavation would be subject to

individual environmental review. If potential for significant impacts on archaeological resources or human remains is identified, mitigation measures similar to those proposed for the Project would be implemented. Moreover, none of the three related projects is in the Project vicinity. Nonetheless, since the potential for existence of archaeological resources and human remains on the Project Site is unknown, the Project has the potential to result in a cumulatively considerable contribution to cumulatively significant impacts on these resources.

4. MITIGATION MEASURES

Mitigation Measures MM-ARCHAEO-1 through MM-ARCHAEO-3 are required to reduce potentially significant impacts to previously unknown or buried archaeological resources that may be encountered during Project implementation.

MM-ARCHAEO-1: The Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor who shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be determined by the archaeological monitor based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus fill or young versus old soils), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Excavations into the Puente/Monterey Formation are not required to be monitored by the archaeologist since these sediments are too old to contain archaeological resources. Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the qualified archaeologist.

MM-ARCHAEO-2: In the event that archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by a qualified archaeologist. The developer shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources if they are determined to be potentially eligible for the California Register or potentially qualify as unique archaeological resources pursuant to CEQA. The treatment plan may include preservation in place (if feasible) and/or the implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The developer, in consultation with the archaeologist and the County, shall designate repositories that meet State standards to curate the archaeological material recovered. Project material shall be curated in accordance with the State Historical Resources Commission's *Guidelines for Curation of Archaeological Collections*.

MM-ARCHAEO -3: The archaeological monitor shall prepare a final report at the conclusion of archaeological monitoring. The report shall be submitted by the Applicant or developer to the County, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures. The report shall include a description of resources unearthed, if any, treatment of the resources, and evaluation of the resources with respect to the California Register.

Mitigation Measure MM-ARCHAEO-4 is required to reduce potentially significant impacts to previously unknown human remains that may be discovered during Project implementation to a less than significant level.

MM-ARCHAEO-4: If human remains are encountered unexpectedly during implementation of the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the developer, inspect the site of the discovery of the Native American remains and may recommend means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete inspection and make a recommendation within 48 hours of being granted access by the developer to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Upon the discovery of the Native American remains, the developer shall ensure that the immediate vicinity where the Native American human remains are located, according to generally accepted cultural or archaeological standards or practices, are not damaged or disturbed by further development activity until the developer has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The developer shall discuss all reasonable options with the descendants regarding the descendants' preferences for treatment.

Whenever the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the developer or the authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Public Resources Code Section 5097.94, if invoked, fails to provide measures acceptable to the developer, the developer or authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measures MM-ARCHAEO-1 through MM-ARCHAEO-4 would ensure avoidance and recovery of previously unknown resources, if encountered, and would reduce Project-level and cumulative impacts to archaeological resources or human remains to a less-than-significant level.

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4.D CULTURAL RESOURCES

4.D.2 PALEONTOLOGICAL RESOURCES

1. INTRODUCTION

This section evaluates potential impacts on paleontological resources that could occur with implementation of the Project. The analysis and recommendations are based on a paleontological resources records search commissioned by PCR through the Natural History Museum of Los Angeles County (NHMLAC), a review of the Geotechnical Report¹ and the Updated Geotechnical Report², and a pedestrian survey of the Project Site. The results of the paleontological records search are included in Appendix C-2, Paleontological Records Search Results of this Draft EIR.

As defined in this section, paleontological resources are the fossilized remains or traces of multicellular invertebrate and vertebrate animals and multicellular plants, including their imprints from a previous geologic period. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (i.e., rock formations) where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the collecting localities and the geologic formations containing those localities.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Geologic Setting

The geologic map of the Whittier and La Habra Quadrangles (Dibblee 2001) indicates that the Project Site is underlain by the Yorba member shale of the Puente Formation bedrock, also known as the Monterey Formation in the area. The Yorba member is described as thin-bedded, white-weathering, platy, siliceous, to light gray and semi-siliceous to silty. Locally thin layers of fine-grained sandstone and a few thin layers of hard dolomite are known to be found within this member.

(2) Resources Identified within the Project Site and Vicinity

(a) Methods

(i) Paleontological Resources Records Search

On July 15, 2015, PCR commissioned a paleontological resources records search through the Vertebrate Paleontology Section of the NHMLAC. This records search included an examination of current geologic maps and known fossil localities inside and within the general vicinity of the Project Site. The objective of the

¹ Southern California Geotechnical, *Geotechnical Investigation and Liquefaction Evaluation, Proposed Mixed Use Development, 18800 East Gale Avenue, Los Angeles County, California, February 3, 2014 and included as Appendix D-1 of this Draft EIR.*

² Southern California Geotechnical, *Update of Geotechnical Report and Conceptual Grading Plan Review, Proposed Mixed Use Development, 18800 East Gale Avenue, Los Angeles County, California, September 10, 2014 and included as Appendix D-2 of this Draft EIR.*

records search was to determine the geological formations underlying the Project Site and whether any paleontological localities have previously been identified within the Project Site or in the same or similar formations near the Project Site. The results also provide a basis for assessing the sensitivity of the Site for buried paleontological resources.

(ii) Pedestrian Survey

On August 10, 2015, PCR conducted a paleontological resources pedestrian survey of the Project Site. The pedestrian survey consisted of transect intervals spaced at approximately 33 to 49 feet apart. Detailed notes and digital photographs were taken of the Project Site and surrounding vicinity. Ground visibility, disturbances, and survey coverage information is provided in the results section, below.

(b) Results

(i) Paleontological Resources Records Search

According to the records at the NHMLAC, surficial deposits in the lower-lying portions of the Project Site (around the margins) are made up of younger Quaternary alluvium deposits which are not known to contain vertebrate fossils. There are also no known fossil localities nearby from these younger Quaternary alluvium deposits. The elevated portions of the Project Site contain exposures of the fossiliferous late Miocene-aged (five to 20 million years ago) Puente Formation. The closest fossil localities from the Puente Formation (LACM 5837, 6170, 6907, 6908, and 7046) are approximately one-half mile to one mile from the Project Site. LACM 5837 is situated east of Nogales Street between Valley Boulevard and La Puente Road. LACM 6170 and 6907-6908 are located west of LACM 5837. LACM 7046 is located south of Fifth Avenue and east of Fullerton Road. These localities have produced a collection of fossil marine vertebrates including bonito shark, top smelt, herrings, saurie, cod, anglerfish, lanternfish, jack, snake mackerel, croakers, sanddab, deep sea smelt, viperfish, bristlemouth, pipefish, and whale. The pipefish fossil specimens recovered from LACM 7046 have been published in the scientific literature of the *Proceedings of the California Academy of Science*. Specimens of the fossil anglerfish from LACM 6908 were published in the scientific literature of *Copeia*. The fossil croaker from LACM 6907 (specimen used to describe a new species to science) was published in the *Bulletin of the Southern California Academy of Sciences*.

The paleontological records search results letter from the NHMLAC is provided in Appendix C-2 of this Draft EIR.

(ii) Pedestrian Survey

The pedestrian survey revealed that the Project Site has been bisected into eastern and western halves by a recently paved detour road—New Charlie Road—between Gale Avenue and Railroad Street. Other disturbances to the Project Site include a parking lot, an active construction storage yard, a paved access road (which leads to a shopping center), and a concrete ditch. The pedestrian survey also revealed that the southeast portion of the Project Site has been previously graded and or cleared, and dirt paths lead onto the northeast portion of the Project Site. A partially channelized storm drain crosses the Site. PCR surveyed approximately 85 percent of the Project Site since access to the construction storage yard area was not available for safety reasons. However, this area was viewed by PCR from outside the fence that bordered the yard, and it appeared to have been previously graded and or cleared. PCR observed no resources on the surface from outside the fence. The remaining areas of the Project Site (outside of the construction storage yard) were covered in seasonal grasses or had been previously cleared. Rodent burrowing and modern

cultural materials (clothes, blankets, plastics, paper scraps, metal posts, glass fragments, butchered cow bone, etc.) was also observed throughout the Project Site. Ground surface visibility for all areas within the Project Site (except for previously cleared areas and the construction storage yard) was poor (i.e., approximately zero to 25 percent) due to grasses that covered the ground surface. No paleontological resources (fossils) were encountered during the pedestrian survey; however, several isolated sandstone deposits that were likely derived from the Puente Formation were observed by PCR throughout the northeast, northwest, and southwest portions (outside of the construction storage yard) of the Project Site.

b. Regulatory Framework Summary

(1) State

(a) California Environmental Quality Act

Appendix G of the State *CEQA Guidelines* provide the following guidance to significant impacts on paleontological resources, “a project will normally result in a significant impact on the environment if it will . . . disrupt or adversely affect a paleontological resource or site or unique geologic feature, except as part of a scientific study.” California Code of Regulations, Title 14, Division 3, Chapter 1, Section 4307 states, in part that “no person shall destroy, disturb, mutilate or remove . . . paleontological features.” Although the State *CEQA Guidelines* do not define the criteria or process to determine whether a paleontological resource is significant or “unique,” some State agencies have developed their own significance criteria. Nevertheless, the lead agency shall determine the criteria or process to evaluate the significance of a paleontological resource and they shall determine whether a given paleontological resource is significant or unique.

(b) Other State Laws, Regulations, and Guidelines

California Public Resources Code Section 5097.5 protects cultural resources on public lands and specifies that any unauthorized removal of paleontological remains is a misdemeanor. California Penal Code Section 622½ states that damage or removal of archaeological or historical resources (which may be interpreted to include paleontological resources) on public or private lands constitutes a misdemeanor.

The Society of Vertebrate Paleontology (SVP) guidelines and policy statements outline acceptable professional practices in paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, specimen preparation, identification, analysis, and curation.

(2) County

(a) County of Los Angeles General Plan

The County of Los Angeles General Plan Conservation and Open Space Element (1980) indicates that the County has many paleontological sites and important geological formations. Due to insufficient funding resources, such sites and formations are not well protected. The General Plan notes that programs and procedures are needed for the identification and protection of cultural resources, which includes paleontological resources.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of paleontological resources is based on a review of stratigraphic and paleontological inventories that were compiled, synthesized, and evaluated by the staff of the Vertebrate Paleontology Section of the NHMLAC, a review of the geological conditions at the Project Site, and a pedestrian survey of the Project Site.

b. Thresholds of Significance

The potential for impacts to paleontological resources is based on thresholds derived from Los Angeles County Department of Regional Planning Initial Study Checklist screening questions, which are based in part on Appendix G of the State *CEQA Guidelines*. These questions are as follows:

5. Cultural Resources. Would the project:

- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or contain rock formations indicating potential paleontological resources?

Based on these factors, the Project would have a potentially significant impact on paleontological resources if it would:

PALEO-1 Directly or indirectly destroy a unique paleontological resource or site, or if the Project Site contains rock formations indicating potential paleontological resources.

c. Project Characteristics

Excavations for an underground storm drain, subterranean parking structures, and building footings for the Project are expected to reach depths between five and 25 feet below existing grade.

The Geotechnical Report prepared for the Project indicates that during soil boring operations at the Project Site, artificial fill was encountered in several different areas at depths between 1.5 to 8.5 feet below the ground surface. Below the artificial fill, native colluvium was encountered throughout the Site between depths of 4.5 and 12± feet below the existing grade. The colluvium consists of dark gray brown to black, medium stiff to hard silty clays. Alluvium was encountered beneath the fill and colluvium materials between depths of 14.5 and 47± feet. Bedrock of the Monterey Formation was found beneath the colluvium and alluvium deposits at most of the boring locations extending from depths of 4.5 to 47± feet.

d. Project Impacts

Threshold PALEO-1 A potentially significant impact on paleontological resources would occur if the Project would directly or indirectly destroy a unique paleontological resource or site, or if the Project Site contains rock formations indicating potential paleontological resources.

Impact Statement PALEO-1: *Implementation of the Project could directly or indirectly destroy a unique paleontological resource, as the site is underlain by a geological formation known to contain fossil localities in the Project vicinity. This is a potentially significant impact.*

As previously discussed, numerous paleontological fossil localities have been recovered in the immediate vicinity within the Monterey/Puente Formation, which also underlies the Project Site. These localities produced a collection of fossil marine vertebrates, and many have been published in the scientific literature. One of the fossils recovered from LACM 6907 (fossil croaker) was used to describe a new species to science. The Geotechnical Report indicated that bedrock of the Monterey Formation can be found at the Project Site at depths of 4.5 to 47± feet below the ground surface. Moreover, PCR identified heavily indurated sandstone deposits scattered across the Project Site during the pedestrian survey, which are consistent with the Monterey/Puente Formation. Based on the excavation parameters, which could reach depths between 5 and 25 feet below existing grade at the Project Site, a high potential exists to encounter paleontological resources during construction excavations associated with the Project. This is a potentially significant impact.

e. Cumulative Impacts

The three related projects identified in Chapter 3.0, are located south of the SR-60 and not contiguous with the Project Site. In addition, those projects with potential for substantial excavation would be subject to individual environmental review. If potential for significant impacts on paleontological resources is identified, mitigation measures similar to those required for the Project would be implemented. Moreover, none of the three related projects is in the Project vicinity. Nonetheless, since the potential for existence of paleontological resources on the Project Site is unknown, the Project has the potential to result in a cumulatively considerable contribution to cumulatively significant impacts on these resources.

4. MITIGATION MEASURES

The following mitigation measures are required to reduce potential Project impacts on paleontological resources.

MM-PALEO-1: A qualified paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter the Puente/Monterey Formation. The paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified paleontologist shall supervise a paleontological monitor who shall be present during construction excavations into the Puente/Monterey Formation. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the paleontologist and shall

be based on the rate of excavation and grading activities, proximity to known paleontological resources or fossiliferous geologic formations, the materials being excavated (native sediments versus artificial fill), the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the qualified paleontologist.

MM-PALEO-2: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing and/or removal. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are curated. Any fossils collected shall be curated at a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a private research institute or local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository.

MM-PALEO-3: The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, and descriptions of the fossils collected and their significance. The report shall be submitted by the Project Applicant to the Lead Agency and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measures MM-PALEO-1 through MM-PALEO-3 provide for avoidance and recovery of resources, if encountered, and would reduce Project-level and cumulative impacts to paleontological resources to a less-than-significant level.

4.E GEOLOGY AND SOILS

1. INTRODUCTION

This section evaluates potential geologic and soils hazards associated with the Project, including fault rupture, ground shaking, liquefaction, expansive soils, and cut and fill stability. A related issue, erosion, is addressed in Section 4.G, Hydrology and Water Quality, of this Draft EIR. This section is based in part on information and findings presented in the *Geotechnical Investigation and Liquefaction Evaluation* (Geotechnical Report)¹ and the *Update of Geotechnical Report Geotechnical Report and Conceptual Grading Plan* (Updated Geotechnical Report)² prepared for the Project by Southern California Geotechnical, included as Appendices D-1 and D-2 to this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Regional and Local Geology

California is divided into geomorphic provinces, which are distinctive, generally easy-to-recognize natural regions in which the geologic record, types of landforms, pattern of landscape features, and climate are similar. Eastern Los Angeles County is in the Peninsular Ranges Geomorphic Province, a series of mountain ranges separated by northwest-trending valleys. The trend of topography in this province is similar to the Coast Ranges, but the geology is more like that of the Sierra Nevada, with granitic rock intruding the older metamorphic rocks. Regional faults within the Peninsular Ranges province are oriented southeast to northwest.

The Project Site is located along the eastern margin of the San Gabriel River Valley in the eastern Puente Hills, an east-to-west-trending range of hills that separates the Los Angeles Basin to the south from the San Gabriel Valley to the north. Uplift of the Puente Hills has exposed a thick sequence of tertiary marine sedimentary rocks of Miocene age. The predominantly siltstone bedrock has been deformed by folding and faulting as the Puente Hills uplifted. The Project Site lies in the alluvial valley formed by San Jose Creek, which separates the Puente Hills on the south from the San Jose Hills to the north.

Geologic research indicates that the site is underlain by the Yorba member shale of the Monterey Formation bedrock.³ The Yorba member shale of the Monterey Formation is described as thin-bedded, weathered white, platy, siliceous, to light gray, semi-siliceous to silty, locally with thin layers of fine-grained sandstone.

¹ Southern California Geotechnical, *Geotechnical Investigation and Liquefaction Evaluation, Proposed Mixed Use Development, 18800 East Gale Avenue, Los Angeles County, California, February 3, 2014.*

² Southern California Geotechnical, *Update of Geotechnical Report and Conceptual Grading Plan Review, Proposed Mixed Use Development, 18800 East Gale Avenue, Los Angeles County, California, September 10, 2014.*

³ T.W. Dibblee, *Geology Map of the Whittier and La Habra Quadrangles, (Western Puente Hills), Los Angeles and Orange Counties, California, 2001, Plate 3 Appendix A of Southern California Geotechnical, Geotechnical Investigation and Liquefaction Evaluation, Op. Cit.*

Locally, the Monterey Formation includes a few thin layers of hard dolomite. The near-surface soils at the Project Site consist of artificial fill materials, colluvium, and native alluvium.

(2) Geologic Hazards

(a) Earthquake Faulting

Southern California experiences many earthquakes because it straddles the boundary between the North American and Pacific plates, and fault rupture accommodates their motion. Along most of California, the Pacific Plate is moving northwesterly (relative to the North American Plate) at about 50 millimeters/year. Therefore, many of the faults associated with the plate movement have a northwest trend and are characterized as strike-slip faults. On average, strike-slip faults are near vertical breaks in the rock. When a strike-slip fault ruptures, the rocks on either side of the fault slide horizontally past each other.

The California Geological Survey (CGS) considers the length of time since the last known seismic activity to be related to the potential for fault activity in the future and, as reflected in the Alquist-Priolo Earthquake Fault Zoning Act (formerly known as the Alquist-Priolo Special Studies Zones Act), “active” and “potentially active” faults are defined according to the length of time that has passed since movement occurred on the fault trace. Established State policy has been to zone only those faults that have direct evidence of movement within the last 11,000 years. The CSG and the Alquist-Priolo Earthquake Fault Zoning Act classify faults according to the following criteria:

- **Active.** Faults showing proven displacement of the ground surface within about the last 11,000 years (Holocene age) that are thought capable of producing earthquakes.
- **Potentially Active.** Faults showing evidence of movement within the last 1.6 million years, but do not show conclusively whether or not they have moved in the last 11,000 years.
- **Not Active.** Faults that have conclusively not moved in the last 11,000 years.

The CGS requires that faults within an approximate 100-kilometer (62-mile) radius be identified for planning purposes. **Table 4.E-1, *Faults and Fault Systems within an Approximate 62-Mile Radius***, provides a list of some of the faults and fault systems within the region considered to potentially contribute to the seismic exposure of the Site. The estimated seismic characteristics of each fault are also summarized in Table 4.E-1 based on available published geologic and seismologic data.⁴ Many of these faults are also shown in **Figure 4.E-1, *Regional Faults***.

CGS policy is to delineate a boundary zone on either side of a known fault trace, called the Alquist-Priolo Earthquake Fault Zone, in which rupture could be anticipated. The delineated width of an Alquist-Priolo Earthquake Fault Zone, which can be between 200 and 500 feet wide on either side of the fault trace, is based on the complexity or regional significance of the fault. If a site lies within a designated Alquist-Priolo Earthquake Fault Zone, a geologic fault rupture investigation must be performed that demonstrates a proposed building site is not threatened by surface displacement from the fault, before development permits may be issued.

⁴ *City of Industry General Plan Update Draft EIR, Table 5.5-1 (February 2014) and Los Angeles County General Plan, Figure 12.1, Seismic and Geotechnical Hazard Zones Policy Map (April 2015).*

Table 4.E-1

Faults and Fault Systems within an Approximate 62-Mile Radius

Fault Name	Approximate Distance (miles)	Maximum Earthquake Magnitude (M_w)	Type of Fault
Whittier Elsinore	3.5	6.8	Strike Slip
San Jose	4.0	6.5	Left Lateral – Reverse Oblique
Chino	7.0	6.7	Right Lateral – Reverse Oblique
Puente Hills Thrust System	7.5	6.5 – 6.7	Reverse
Sierra Madre	9	7.0	Reverse
Raymond	10	6.5	Left Lateral – Reverse Oblique
Elysian Park Thrust	12	6.7	Reverse
Cucamonga	14	7.0	Reverse
Clamshell-Sawpit	18	6.5	Reverse
Verdugo	22	6.7	Reverse
Compton Thrust	22	6.8	Reverse
Hollywood	25	6.4	Left Lateral-Reverse Oblique
Newport-Inglewood (LA Basin)	26	6.9	Strike Slip
Santa Monica	24	6.6	Left Lateral-Reverse Oblique
Palos Verdes Hills	37	7.1	Strike Slip
San Gabriel	40	7.0	Strike Slip
Elsinore-Glen Ivy	44	6.8	Strike Slip
San Andreas-Mojave	49	7.1	Strike Slip
San Jacinto-San Bernardino	58	6.7	Strike Slip

Source: City of Industry General Plan Draft EIR, Table 5.5-1, Fault Systems within 100 Kilometers of Industry, February 2014.

According to the 1990 Los Angeles County General Plan Safety Element, the nearest Alquist-Priolo Fault Zone to the Project Site is located approximately 3.5 miles to the south of the Project Site and is associated with the Whittier Fault.

(b) Ground Shaking

Although not exposed to a greater than normal seismic risk than other properties in Los Angeles County, the Project Site is located within a seismically active region. Moderate to strong ground motion (acceleration) could be caused by an earthquake on any of the local or regional faults, the nearest of which are the Whittier Elsinore, San Jose, and Chino Faults and Puente Hills Thrust System. However, any faults listed on Table 4.E-1 could generate ground motion at the Project Site. The level of ground shaking at any site is a function of several factors including earthquake magnitude, type of faulting, rupture propagation path, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology (such as liquefaction potential). Because of potential ground shaking in the region, building design and construction are required to conform to the current seismic design provisions of the California Building Code (CBC) and Los Angeles County Building Code. The CBC sets forth Seismic Design Parameters according to a software system developed by the United States Geological Survey (USGS), which calculates ground motion.

(c) Liquefaction

Liquefaction is the loss of strength in generally cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. The primary factors that influence the potential for liquefaction include groundwater table elevation, soil type and plasticity characteristics, relative density of the soil, initial confining pressure, and intensity and duration of ground shaking. Liquefaction potential is greater in saturated, loose, poorly graded fine sands with a mean (d₅₀) grain size in the range of 0.075 to 0.2 mm. The depth within which the occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface. Clayey (cohesive) soils that possess a plasticity index of at least 18 are generally not considered to be susceptible to liquefaction, nor are soils located above the historic static groundwater table.

The Project Site is within the Zone of Required Investigation for Liquefaction, as shown on CGS's Seismic Hazard Zone Maps for the Baldwin Park, El Monte, La Habra, San Dimas, and Yorba Linda Quadrangles (CGS 2011).⁵ In addition, the Project Site is located within a designated Seismically Induced Liquefaction Zone.⁶ Areas of liquefaction susceptibility are shown in **Figure 4.E-2, Los Angeles County Seismic and Geotechnical Hazard Zones.**

(3) Subsurface Soils

Fill materials at the Project Site vary from near surface to approximately five feet of depth. The Site is located in an area underlain by alluvium consisting of interlayered mixtures of silty sand, sand, silt, and clay. Subsurface exploration of the Project Site consisted of 18 borings advanced to depths of 5 to 61½ feet below current Site grades. Two of the borings were drilled to at least 50± feet, and several other borings encountered very dense bedrock at shallower depths. All of the borings, which are identified in **Figure 4.E-3, Boring Location Map,** were logged during drilling.

(a) Expansive Soils

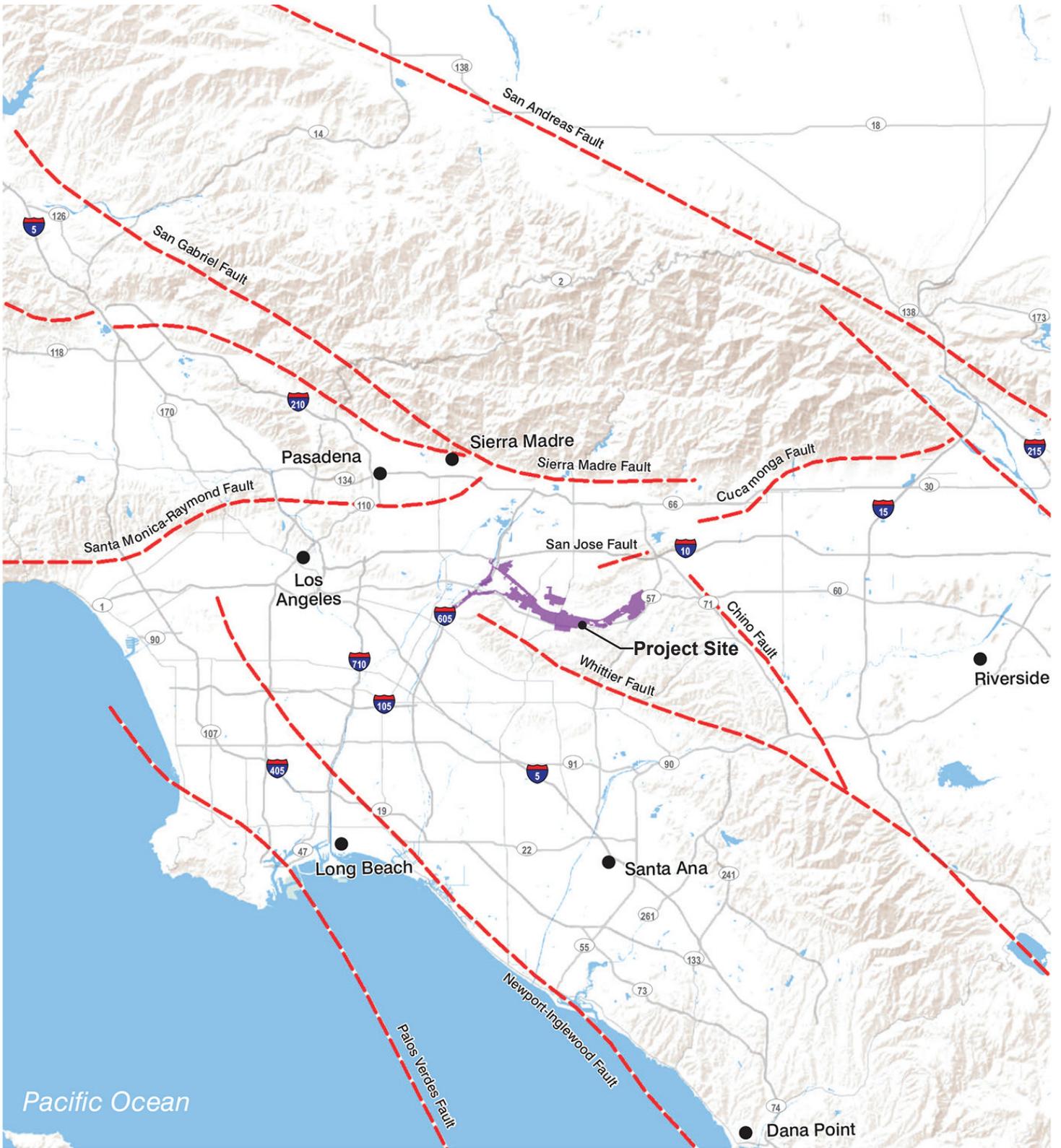
Expansive soils are soils, such as clays, that are capable of absorbing water and thereby increasing their volumes. When unaccounted for, soil expansion can have adverse effects on structures. The Geotechnical Report determined, based on testing representative bulk samples of the on-site surface soils (0 to 5 feet in depth), that the expansion potential at borings B-1 and B-12 had a "medium" expansion potential, and boring B-8 had a "high" expansion potential. Most of the near surface soils at the Project Site consist of sandy clays and silty clays.

(b) Corrosive Soils

Selected representative samples of soil collected from the future building areas were tested for electrical resistivity and pH. "Resistivity" of the soils is a measure of their potential to attack buried metal improvements such as utility lines. The results of the resistivity and pH testing indicate pH values ranging

⁵ *City of Industry General Plan Update Draft EIR, p. 5.5-12, February 2014.*

⁶ *Los Angeles County Department of Regional Planning, General Plan Safety Element, Figure 12.1 (2014), based on California Geological Survey, A-P maps: 1974-2014.*



--- Regional Faults

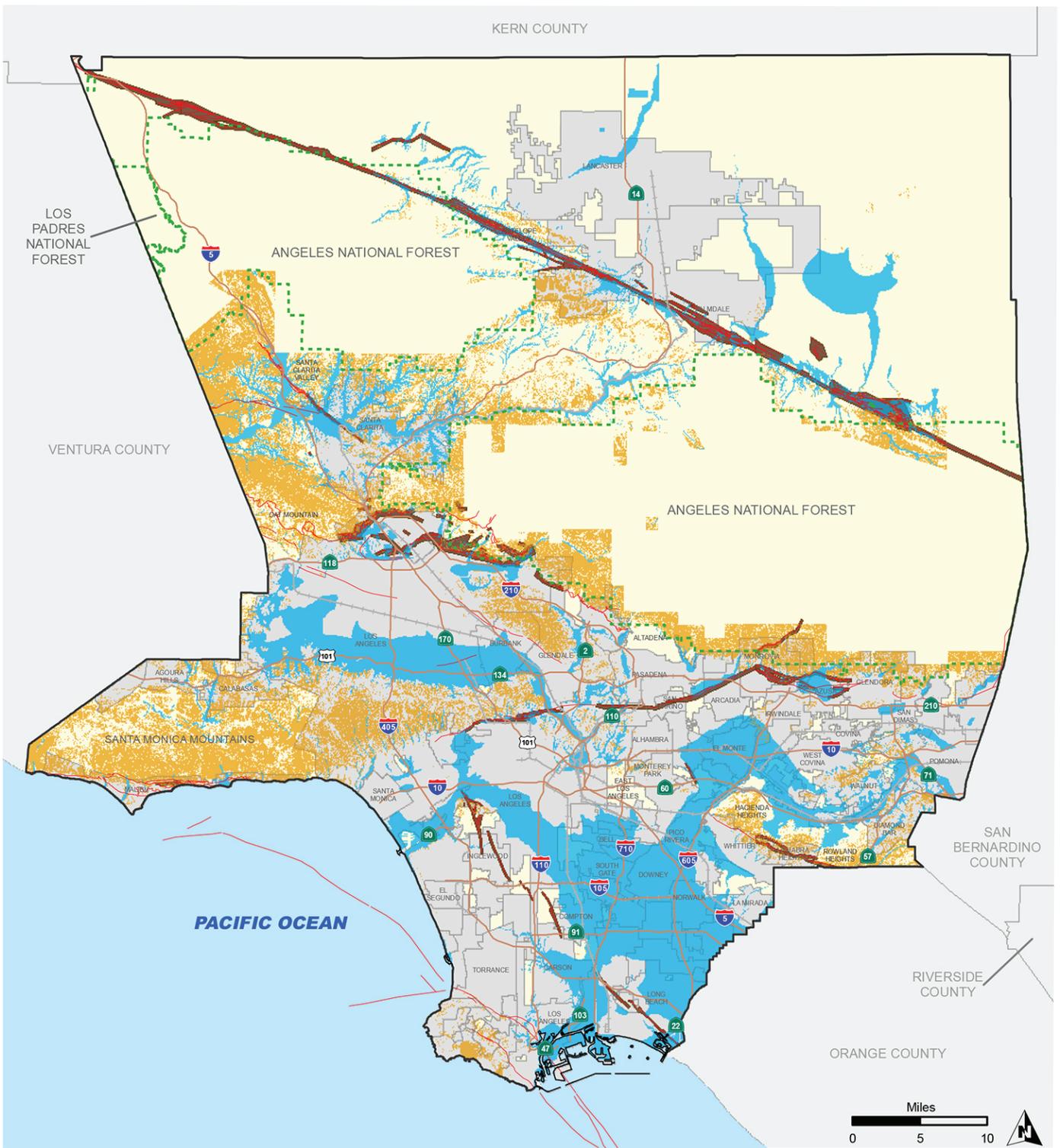


Regional Faults

Rowland Heights Plaza and Hotel Project

Source: City of Industry General Plan Update Draft EIR, February 2014.

FIGURE
4.E-1



- Active Fault Trace ***
- Seismically Induced Landslide Zone **
- Seismically Induced Liquefaction Zone *
- Alquist-Priolo Earthquake Fault Zone **
- Unincorporated Areas
- Cities

Source: Department of Regional Planning, Nov. 2014. Additional Sources: * California Geological Survey, A-P maps: 1974-2014. ** California Geological Survey, Seismic Hazard Zone Maps, 1997-2005. *** Los Angeles County General Plan, Fault Rupture Hazards and Historic Seismicity Map, 1990. (USGS GIS data was used for refinement of mapped faults.)

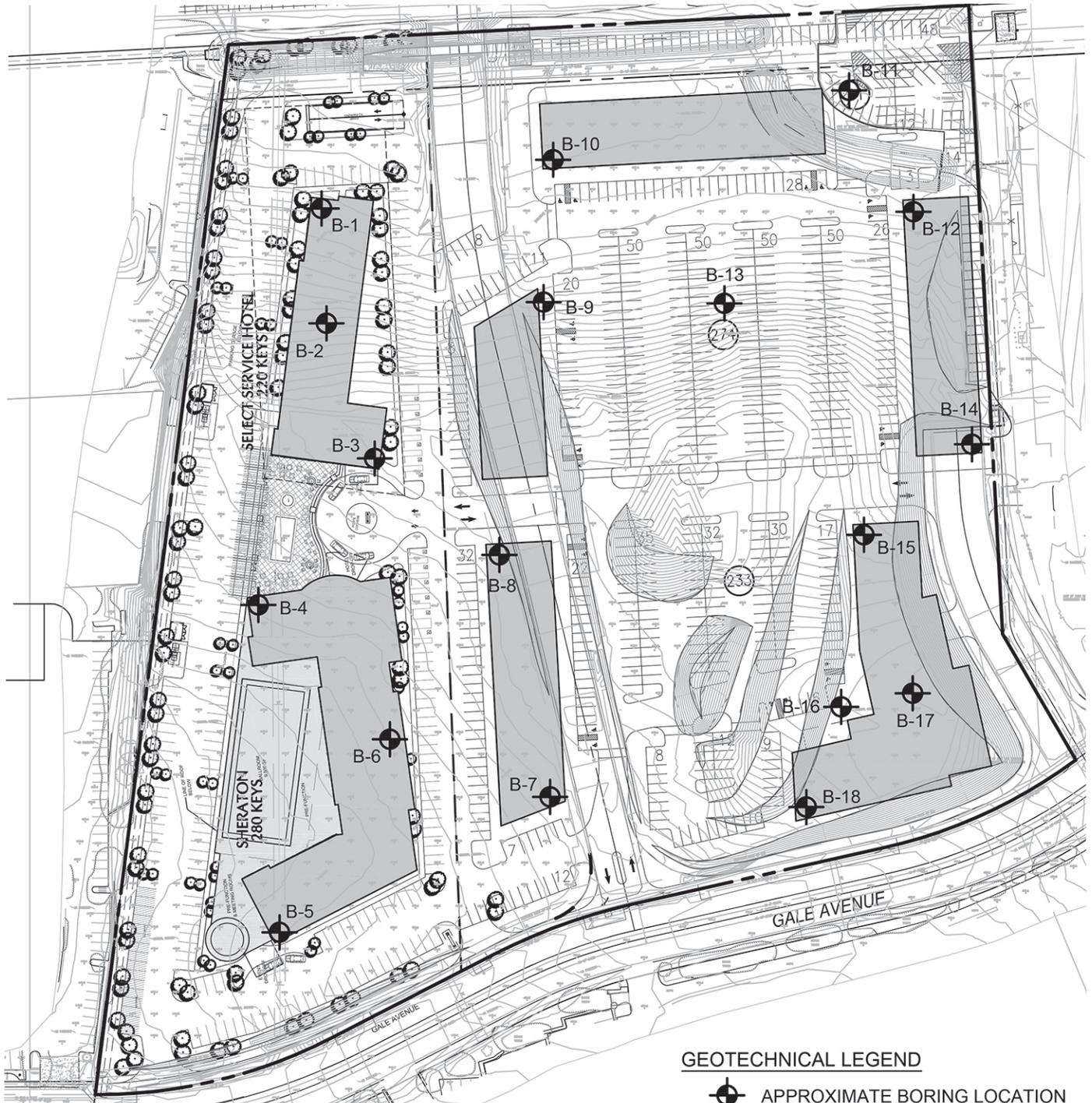


Los Angeles County Seismic and Geotechnical Hazard Zones

Rowland Heights Plaza and Hotel Project

Source: Department of Regional Planning, General Plan Update, Figure 12.1, November 2014.

FIGURE
4.E-2



GEOTECHNICAL LEGEND

-  APPROXIMATE BORING LOCATION
-  PROPOSED BUILDING



Boring Location Map

Rowland Heights Plaza and Hotel Project
 Source: Southern California Geotechnical, 2015.

FIGURE
4.E-3

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from 7.4 to 8.0, and electrical resistivity of 3,180 and 4,640 ohm-cm, which are considered to be noncorrosive to ductile iron pipe. In addition, on-site soluble sulfates were determined to be negligible, and only low levels of chlorides were detected. Low concentrations of these elements indicate that on-site soils are noncorrosive to reinforcing steel in structural concrete.

(c) Artificial Fill

The near-surface soils consist of artificial fill materials, colluvium, and native alluvium. On-site artificial fill soils possess variable strengths, composition, and densities which are not considered suitable support for structures. Also, some of the on-site artificial fill materials possess unfavorable consolidation/collapse characteristics. On-site native alluvial soils and colluvium generally possess higher strengths and more favorable consolidation.

(4) Bedrock

Bedrock, which was encountered beneath the colluvium and alluvium at most of the boring locations within the Project Site, consists of silty claystone and sandy siltstone bedrock of the Monterey Formation. The Monterey Formation bedrock extends from depths of 4½ to 47± feet below the ground surface to depths of at least 56± feet (the maximum depth of drilling before refusal conditions were encountered at boring No. B-6). Bedrock was generally encountered at shallower depths within the central portion of the Site and at greater depths in the northern and southern portions of the Site.

(5) Groundwater

Very moist to wet soils were encountered during drilling at boring Nos. B-4, B-5, B-6, B-11, and B-17, at depths ranging from 25 to 37± feet below the existing Site grades. Delayed readings taken within the open boreholes identified free water at similar depths. Based on the water level measurements and the moisture contents of the recovered soil samples, the static groundwater table is considered to have existed at elevations between 423 and 431± feet above mean sea level (MSL) in the southern area of the Site and at an elevation of 414± feet above MSL in the northeastern area of the site at the time of the subsurface exploration. Historic high groundwater levels reported by the California Department of Mines and Geology indicate that the historic high ground water level at the subject site and surrounding areas is approximately 20± feet below existing grades.⁷

b. Regulatory Framework Summary

(1) State

(a) Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code Section 2621) was enacted by the State of California in 1972 to address the hazard of surface faulting to structures for human occupancy.⁸ The

⁷ California Division of Mines and Geology (currently, the California Geological Survey), *Open-File Report 98-10 for the La Habra Quadrangle. Plate 1.2 of OFR 98-19 0, cited in Southern California Geotechnical, Geotechnical Investigation and Liquefaction Evaluation, Op. Cit., page 9.*

⁸ The Act was originally entitled the Alquist-Priolo Geologic Hazards Zone Act.

purposes of the Alquist-Priolo Earthquake Fault Zoning Act are to prevent the construction of buildings intended for human occupancy on the surface traces of active faults, to provide the citizens with increased safety, and to minimize the loss of life during and immediately following earthquakes by facilitating seismic retrofitting to strengthen buildings against ground shaking. The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish regulatory zones, known as “earthquake fault zones.” These are zones that lie within 500 feet on either side of the surface traces of active faults. The State Geologist is also required to issue appropriate maps to assist cities and counties in planning, zoning, and building regulation functions. Local agencies enforce the Alquist-Priolo Earthquake Fault Zoning Act in the development permit process, where applicable, and may be more restrictive than State law requires. According to the Alquist-Priolo Earthquake Fault Zoning Act, before a project that is within an Alquist-Priolo Earthquake Fault Zone can be permitted, cities and counties shall require a geologic investigation, prepared by a licensed geologist, to demonstrate that buildings will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back. Although setback distances may vary, a minimum 50-foot setback is required.

(b) Seismic Hazards Mapping Act

To address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990 (Public Resources Code Section 2690-2699). Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate “seismic hazard zones.” Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of sites are investigated and appropriate mitigation measures, if any, are incorporated into development plans.

Under the Seismic Hazards Mapping Act, cities and counties are required, prior to the approval of a project located in a seismic hazard zone, to prepare a geotechnical report defining and delineating any seismic hazard. Each city or county is required to submit one copy of each geotechnical report, including mitigation measures, to the State Geologist within 30 days of its approval.

(c) California Building Code

The CBC, Title 24 of the California Code of Regulations, is a compilation of building standards, including seismic safety standards for new buildings. CBC standards are based on building standards that are adopted without change from the most recently adopted International Building Code; building standards based on the national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code, such as certain American Society of Civil Engineers (ASCE) standards. The CBC applies to all occupancies in California, except where stricter standards have been adopted by local agencies. Chapter 16 of the CBC contains provisions for structural design which includes, among others, soil lateral loads (Section 1610) and earthquake loads (Section 1613). Provisions for soils and foundations which includes geotechnical explorations (Section 1803), excavation, grading and fill (Section 1804), and foundations (Sections 1808-1810), among others, are presented in Chapter 18. Appendix J of the CBC applies to grading. Specific CBC building and seismic safety regulations contained in Chapter 16 and Chapter 18 of the California Building Code regarding soils and foundations have been incorporated by reference into the Los Angeles County Code (LACC) with local amendments.

(2) County

(a) Los Angeles County General Plan Safety Element

The purpose of the County General Plan Safety Element, adopted in 1990, is to assess threats to public health and safety from a variety of hazards and to recommend strategies to reduce those threats. The Safety Element works in conjunction with the All-Hazard Mitigation Plan prepared by the Chief Executive Office-Office of Emergency Management, which sets strategies for natural and man-made hazards in Los Angeles County. Map 4, Special Management Areas, of the Safety Element identifies major fault zones and Hillside Management Areas in the County. Plates 1 through 8 of the Safety Element identify Fault Rupture Hazards and Historic Seismicity; Engineering Geologic Materials (geologic and soil units); Liquefaction Susceptibility; and Landslide Inventory.

The Safety Element goal for seismic hazards is to “Minimize injury and loss of life, property damage, and the social, cultural, and economic impacts caused by earthquake hazards.” Policies applicable to this Project address County review of new development projects to ensure avoidance of localities at high risk from earthquake hazards and enforcement of stringent site investigations, including seismic, geologic, and soil investigations, to ensure adequate mitigation measures are implemented.

The Safety Element goal for geologic hazards is to “Protect public safety and minimize the social and economic impacts from geologic hazards.” The policy applicable to this Project addresses County review of development proposals and proper mitigation for areas susceptible to geologic hazards such as landslides, debris flow, rockfall, and expansive soils.

(b) Los Angeles County Code

Title 26 of the LACC contains the County Building Code, which incorporates by reference the CBC, with County amendments for additional requirements. Title 26, Chapter 16, Structural Design sets forth provisions for earthquake loads (Section 1613) and modifications to ASCE 7. ASCE 7, which is incorporated into the CBC, establishes minimum design loads for buildings and other structures. Section 111 of the County Building Code comprises the Manual for Preparation of Geotechnical Reports (July 1, 2013), which is administered by the Los Angeles County Department of Public Works (LACDPW), Geotechnical and Materials Engineering Division, and sets forth requirements for geotechnical work. Under Section 111, a geotechnical report or engineering geology report must be prepared by California licensed Engineering Geologists for compliance with governmental regulations, including Los Angeles County and State of California requirements. Section 111 requires that geology reports prepared for environmental impact documents identify existing and potential geologic hazards and present measures to mitigate their effects on the environment relative to the proposed development. The investigation in preparation of the report should provide sufficient data to determine the extent of work required to mitigate any potential environmental hazards.⁹ Grading Guidelines (January 2008), also known as Appendix J of the County Building Code, was developed by the LACDPW, Building and Safety and Land Development Divisions to provide minimum standards related to grading, excavation, and earthwork. Under Appendix J, no person shall do any grading

⁹ *Los Angeles County Department of Public Works, Geotechnical and Materials Engineering Division, Manual for Preparation of Geotechnical Reports, July 1, 2013, page 6.*

without first obtaining a grading permit from the building official. Grading in excess of 5,000 cubic yards must be performed in accordance with the approved grading plan and is designated as “engineered grading.”

(3) City of Industry

(a) City of Industry General Plan Safety Element

The goal of the City of Industry General Plan Safety Element, adopted June 2014, is “Minimal loss of life and damage to property resulting from an earthquake or other geologic hazards.” The General Plan states that the majority of the City is within a zone of required investigation for liquefaction. The Safety Element further provides Figure 14, Liquefaction and Landslide Hazards, which identifies hazard areas, and states that the California Seismic Hazards Mapping Act requires that site-specific geotechnical investigations be conducted within these zones to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy.

(b) City of Industry Municipal Code

The City of Industry Municipal Code incorporates Title 26 (Building Code), including Section 111, of the LACC by reference. Also incorporated by reference is Title 26 Appendix J, Grading, which applies to grading, excavation, and earthwork construction including fills and embankments. Geotechnical investigations and grading plans for projects within the City of Industry are administered and reviewed (under contract) by the LACDPW.

3. ENVIRONMENTAL IMPACTS

a. Methodology

This analysis of impacts related to geology and soils is based on the Geotechnical Report and Updated Geotechnical Report included as Appendices D-1 and D-2 to this Draft EIR.

The liquefaction analysis in the Geotechnical Report was prepared in accordance with the requirements of Special Publication 117A and currently accepted practice. The liquefaction potential was analyzed at boring Nos. B-6, B-11 and B-17 utilizing a peak ground acceleration (PGA_M) of 0.796g related to a 6.99 magnitude seismic event.

Soil samples were tested to determine their selected physical and engineering properties, as described in the Geotechnical Report. Direct shear tests were performed on selected soil samples to determine their shear strength parameters. Representative samples of the near-surface soils were analyzed for soluble sulfate content. The expansion potential of on-site soils was determined in general accordance with the American Society for Testing and Materials (ASTM) D-4829, as required by the CBC. Selected representative bulk samples of soil collected from the building areas were also analyzed for electrical resistivity and pH (a measure of their potential to attack buried metal improvements such as utility lines).

While the Geotechnical Report provides sufficient detail to determine whether the Site is suitable for the intended use and identifies design considerations to be taken into account in the design of the proposed buildings, the report acknowledges that more detailed studies based on final building plans are required to address specific geological issues, such as liquefaction. Respectively, a final geotechnical report based on the

finished construction and building plans must also be prepared and reviewed by the County prior to issuance of building permits.

The Updated Geotechnical Report provides additional design recommendations based on a review of a conceptual grading plan, a Site reconnaissance, an updated description of the Project, and additional laboratory testing. The additional recommendations address liquefaction, seismic design, remedial grading, and foundation design.

b. Thresholds of Significance

The potential for geology impacts is based on thresholds derived from Los Angeles County Department of Regional Planning Initial Study Checklist screening questions, which are based in part on Appendix G of the State *CEQA Guidelines*. These questions are as follows:

7. Geology and Soils Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map topics by the State Geologist for the area or based on other substantial evidence of a known active fault trace? Refer to Division of Mines and Geology Special Publication 42.
 - ii) Strong seismic ground shaking;
 - iii) Seismic-related ground failure, including liquefaction and lateral spreading;
 - iv) Landslides?
- b) Result in substantial soil erosion or the loss of topsoil?
- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- d) Be located on expansive soil, as defined by Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
- e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?
- f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, § 22.56.215) or hillside design standards in the County General Plan Conservation and Open Space Element?

The Initial Study determined that the Project would have no impact or less than significant impacts with respect to: a-iv) landslides, e) soils incapable of supporting on-site wastewater treatment where sewers are not available for disposal, and f) conflict with the County's Hillside Management Area Ordinance or hillside design standards in the County General Plan Conservation and Open Space Element. These environmental topics are not evaluated in this EIR.

Based on these factors, the Project would have a potentially significant impact on geology and soils if it would:

- GEO-1** Expose people or structures to substantial risk related to earthquake fault rupture, strong seismic ground shaking, ground failure including liquefaction and lateral spreading, erosion, subsidence, collapse, or expansive soils.

c. Project Characteristics or Design Features

Two hotel buildings are proposed on the western portion of the Project Site, and four commercial/retail buildings are proposed for the eastern portion. Construction activities would consist of excavation for subterranean parking levels and the provision of appropriate foundations for the buildings. The grading plan indicates that the finished floor grades for these buildings would be 454.10 feet above MSL for Hotel A and 454.82 feet above MSL for Hotel B. Both buildings would provide one level of subterranean parking, with parking garage floor grades approximately 14 feet below the first story finished floor grades. In general, cuts of 7 to 25± feet would be necessary to achieve the proposed parking garage subgrade of 440± feet above MSL, which is approximately 14 feet below the finished grade shown on the conceptual development plan. To achieve desired grades for the four retail buildings in the east portion of the site, cuts are expected to range from 2 to 25± feet and fills of 12.5± feet are expected. Cuts and fills of up to 15± feet may be necessary to achieve the proposed Site grades.

Approximately 322,619 cubic yards of soils would be graded and excavated for Project construction, the majority of which would be reused as fill on Site (130,534 cubic yards of the 192,085 cubic yards of cut material would be used as fill). Approximately 48,301 cubic yards of soil would require export off Site. Activities associated with the grading and export of soil would occur in accordance with County and City of Industry requirements through the grading plan review and the approval process.

All development would be undertaken pursuant to applicable codes and regulations, including the County Building Code, as well as applicable regulations established by LACDPW Geotechnical and Materials Engineering, Building and Safety, and Land Development Divisions. As such, prior to issuance of a grading permit, a qualified geotechnical engineer would be required to submit a final geotechnical report with recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation. Further, a qualified geotechnical engineer would be required to be present on the Project Site during excavation, grading, and general site preparation activities to monitor implementation of the recommendations specified in the Geotechnical Report, Updated Geotechnical Report, and final geotechnical report, as well as other recommendations that may be made in subsequent geotechnical reports prepared for the Project, subject to County of Los Angeles review and approval.

Specific recommendations of the Geotechnical Report and Updated Geotechnical Report will be incorporated into the Project. These include the following:

- All surficial vegetation and topsoil will be removed. The actual extent of site stripping will be determined in the field by the geotechnical engineer, based on the organic content and stability of the materials encountered.

- Initial Site preparation will include demolition of the newly constructed temporary street, existing asphalt parking areas, and the remnants of an old asphaltic concrete road. Any remnants of previous development and including pavements, foundations, floor slabs, and debris resulting from demolition activities will be properly disposed of off Site. Concrete and asphalt debris may be reused within the compacted fills, provided they are pulverized and the maximum particle size is less than 2 inches.
- Remedial grading is recommended within the new building pad areas to remove a portion of the near-surface native soils and all undocumented fill soils, which extend to depths of 1½ to 8½± feet. The over-excavation should extend to a depth of at least 5 feet below the existing grade, 5 feet below the proposed pad grade, and to a depth sufficient to remove all of the existing undocumented fill soils.
- Within the proposed building areas, the over-excavation (remedial grading) will remove existing soils and bedrock materials in cut and shallow fill areas to provide a minimum 5-foot thick blanket of newly placed compacted fill below pad grade to reduce possible differential settlement due to cut/fill transitions.
- Additional over-excavation will be performed within the influence zones of the new foundations to provide for a new layer of compacted structural fill extending to a depth of at least 3 feet below proposed bearing grade in the areas of the commercial/retail buildings. Within the proposed hotel sites, over-excavation below shallow foundations will extend to a depth equal to the width of the footing, or into suitable bedrock materials.
- Following completion of the recommended over-excavation, the exposed soils or bedrock materials will be evaluated by the geotechnical engineer. Based on conditions encountered at the boring locations, additional over-excavation may be required where porous, low-density, or otherwise unsuitable soils are encountered. After the subgrade soils have been approved by the geotechnical engineer, the previously excavated soils will be replaced and compacted to at least 90 percent of the ASTM D-1557 maximum dry density.
- Prior to issuance of a grading permit, final structural and foundation designs shall be reviewed by a qualified geotechnical engineer and professional structural engineer to determine the Site Class of building sites in accordance with the 2013 CBC. If spectral acceleration for any structure is determined to exceed 0.5 second, Site Class F shall be applied to affected building site. Such determination shall require a site-specific ground motion study in accordance with Chapter 21 of ACSE 7-10. Subject to LACDPW approval, final foundation designs shall be based on the estimated spectral acceleration for the building sites and the results of any needed ground motion analyses.
- Prior to issuance of a grading permit, a qualified geotechnical engineer shall prepare and submit to the LACDPW a final geotechnical report that provides recommendations for all foundations, retaining walls/shoring and excavation to meet applicable State and County regulatory requirements. A qualified geotechnical engineer shall be retained by the Applicant to be present on the Project Site during excavation, grading, and general Site preparation activities to monitor the implementation of the recommendations specified in the geotechnical report and any other subsequent geotechnical reports prepared for the Project, subject to LACDPW review and approval.

- Because of the presence of expansive soils, moisture condition and content shall be monitored and maintained within all subgrade soils as well as newly placed fill soils, during grading. Additional expansion index testing shall be performed subsequent to grading to confirm the actual conditions at the building pad subgrade elevations. If expansive soil conditions are determined subsequent to grading, corrective actions proposed by a qualified geotechnical engineer and the LACDPW shall be implemented.

d. Project Impacts

(1) Geologic Hazard Effects

Threshold GEO-1: A significant impact on geology and soils would occur if the Project would expose people or structures to substantial risk related to earthquake fault rupture, strong seismic ground shaking, ground failure including liquefaction and lateral spreading, erosion, subsidence, collapse, or expansive soils.

***Impact Statement GEO-1:** Project impacts related to fault rupture, seismic ground shaking, liquefaction and lateral spreading, erosion, subsidence, and collapse would be less than significant through compliance with applicable regulatory requirements and Project characteristics, including the recommendations of the Geotechnical Report and Updated Geotechnical Report.*

(a) Fault Rupture

No known active or potentially active faults underlie the Project Site, and the Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone. Thus, the potential for surface ground rupture at the Project Site is considered low. Based on the analysis of borings and other information related to the Project Site, proposed development would not be affected by ground rupture resulting from earthquake faulting. The Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault; therefore, impacts from fault rupture would be less than significant.

(b) Ground Shaking/Seismicity

Moderate to strong ground motion (acceleration) could be caused by an earthquake on any of the local or regional faults, the nearest of which are the Whittier, Elsinore, San Jose, Chino, and Puente Hills Thrust System. The Project Geotechnical Report describes CBC procedures for earthquake resistant structural design that include considerations for on-site soil, occupancy, and configuration of the structure, including the structure system and height. The seismic design parameters for the Project are based on the soil profile performed for the Project Site and proximity of known faults and are estimated to be 0.664 g¹⁰ based on the presence of weathered Monterey Formation bedrock within the upper 100± feet of the subsurface profile throughout the Project Site.^{11 12} However, the Geotechnical Report also found that, if a fundamental period

¹⁰ In this context, "g" is the acceleration of the ground during a seismic event. Acceleration is expressed as the rate of increase of velocity per unit of time relative to earth's gravity and assigned the standard value of 980.665 centimeters per second per second – also called "g."

¹¹ U.S. Geological Survey, Design Maps Summary Report, Appendix E, Seismic Design Parameters, of the Southern California Geotechnical, Geotechnical Investigation and Liquefaction Evaluation, February 2014.

¹² Southern California Geotechnical, Geotechnical Investigation and Liquefaction Evaluation, Op. Cit., page 15.

of vibration were greater than 0.5 seconds, as determined through a review of final building plans, the Site Class would be considered Class F, under which any affected structures would require a site-specific ground motion study. The ground motion study would determine the appropriate foundation system for buildings within potential liquefaction areas. The recommendations of the Geotechnical Report and Updated Geotechnical Report require that, prior to issuance of a grading permit, final structural and foundation designs should be reviewed by a qualified geotechnical engineer and professional structural engineer to determine the Site Class of the building site.¹³ Subject to LACDPW approval, final foundation designs would be based on the estimated spectral acceleration for the building sites and the results of any needed ground motion analyses. With the implementation of these recommendations, impacts related to ground shaking and seismicity would be less than significant.

(c) Liquefaction

Eighteen borings were performed on the Project Site to determine subsurface conditions and liquefaction potential. Prior to subsurface exploration, additional deep borings were intended to be drilled in the northwest and central portions of the Site to evaluate liquefaction hazard. The majority of these borings encountered very dense bedrock at depths shallower than the depth of the historic high groundwater table, indicating a non-liquefiable condition. According to the Updated Geotechnical Report, liquefaction related to settlement is not considered to be a design concern for most of the proposed buildings due to the presence of very dense bedrock at depths shallower than the historic high groundwater table.¹⁴ However, boring Nos. B-6, B-11, and B-17 identified potentially liquefiable soils at three of the proposed building locations in the southwest, southeast and northeast sectors of the Project Site. These locations were found to be underlain by alluvial soils which extend to depths greater than the historic high groundwater table. As such, liquefaction is considered to be a design concern for the buildings located near these boring locations and would be addressed by the recommendations of the Geotechnical Report and Updated Geotechnical Report, which would ensure compliance with applicable regulatory requirements related to potential site-specific liquefaction.

The estimated differential settlements would occur across a distance of 100 feet, indicating angular distortions of less than 0.001 inches per inch. It is expected that minor to moderate repairs, including repair of damaged drywall and other surface coverings could be required after the occurrence of liquefaction-induced settlements. However, according to the liquefaction evaluation, these settlements are considered to be within the structural tolerances of typical buildings supported on shallow foundation systems.¹⁵ Therefore, seismic shaking discussed under Subsection d(1)(b) above in liquefiable areas and settlement related to liquefaction would be less than significant.

(d) Expansive Soils

Most of the near-surface soils at this Site consist of sandy clays and silty clays with medium to high expansion potentials. Due to the significant amount of grading expected to be performed and the potential for expansive soils, the Geotechnical Report concluded that the finished Site would possess a medium

¹³ Southern California Geotechnical, *Update of Geotechnical Report and Conceptual Grading Plan Review, Op. Cit., page 6.*

¹⁴ Southern California Geotechnical, *Update of Geotechnical Report and Conceptual Grading Plan Review, Op. Cit., page 5.*

¹⁵ *Ibid.*

expansion potential.¹⁶ Recommendations of the Geotechnical Report and Updated Geotechnical Report require that moisture condition and content be monitored and maintained within all subgrade soils, as well as newly placed fill soils, during grading. Because of the potential for expansive soils, additional expansion index testing would need to be performed subsequent to grading to confirm the actual conditions at the building pad subgrade elevations. If expansive soil conditions are determined subsequent to grading, corrective actions proposed by a qualified geotechnical engineer and the LACDPW would be implemented. With the implementation of these recommendations, impacts related to expansive soils would be less than significant.

(e) Differential Settlement

The near-surface fill soils possess variable strengths, compositions, and densities. Some of the artificial fill materials also possess marginal consolidation/collapse characteristics. The recommended remedial grading (see Project Characteristics and Design Features, above) would remove the artificial fill soils and the upper portion of the native soils from the building pad areas. The native soil and bedrock materials remaining beneath the depth of over-excavation generally possess greater strengths. Based on the results of the laboratory testing, the removal and recompaction of native alluvial soils and colluvium is estimated to result in an average shrinkage of 8 to 12 percent. Relatively minor bulking of 0 to 5 percent may occur in areas of significant cut into weathered bedrock materials.

Minor ground subsidence is expected to occur in the soils below the zone of removal due to settlement and the effects of construction activity. Based on subsurface conditions encountered at the boring locations, the actual amount of subsidence is expected to be variable and will be dependent on the type of machinery used, repetitions of use, and dynamic effects, all of which are difficult to assess precisely. However, subsidence within alluvial soils is estimated to be 0.1 foot. Based on the conceptual grading plan, cut/fill transitions would be created beneath the proposed subterranean parking garage grades in the northern portion of the Hotel A, the central portion of the Hotel B site, the northwestern portion of Retail Building No. 2, and at the finished pad grade near the northeast corner of Retail Building No. 1. The differing support conditions of the native soils versus the newly compacted fill soils may result in excessive differential settlements. Additionally, geologic contacts between the Monterey Formation bedrock materials and the native alluvium and colluvium would be present at the proposed finished pad grades in some of the proposed building pad areas requiring cuts. Similarly, the support characteristics of the weathered bedrock materials and native soils differ, and the presence of both materials at the floor slab and foundation bearing grades is expected to result in excessive differential settlements.

Remedial grading, discussed under Subsection c., Project Characteristics or Design Features, above, would provide a blanket of compacted fill beneath the building foundations and floor slabs that would soften the cut/fill transitions and geologic contacts occurring at building pad and foundation bearing grades. The proposed remedial grading discussed would reduce the potential for differential settlement across cut-fill transitions. With the implementation of this design feature, the post-construction static settlements of the proposed structure are expected to be within tolerable limits. Therefore, impacts with respect to differential settlement would be less than significant.

¹⁶ *Southern California Geotechnical, Geotechnical Investigation and Liquefaction Evaluation, Op. Cit., page 20.*

(f) Cut and Fill Stability

Project cut and fill activities would disturb existing soils and contribute to potential localized failure in graded areas. All cut and fill areas would be shored and compacted in accordance with applicable provisions of the CBC, as incorporated into the County Building Code and County Building Code Appendix J. Appendix J establishes standards for grading activities and requires on-site inspection for all temporary and permanent graded areas and slopes, including foundation excavations. With proposed remedial grading and compliance with CBC and County Building Code Appendix J regulations, as enforced by the County of Los Angeles, impacts related to cut and fill stability would be less than significant.

e. Cumulative Impacts

***Impact Statement GEO-2:** Because related projects are not near the Project Site and are small in scale and would not require mass grading, the Project, considered together with related projects, would not result in a cumulatively considerable contribution to cumulatively significant grading and excavation impacts, or impacts related to the exposure of an increased local population to seismic hazards.*

Impacts associated with geology and soils are typically confined to a project site or otherwise highly localized. The related projects identified in Chapter 3.0, General Description of Environmental Setting, of this Draft EIR include restaurants in the vicinity of Colima Road and SR-60/Fullerton Road intersection and other office and restaurant uses on Colima Road. All of these projects are located south of SR-60 and not contiguous with the Project Site. In addition, the related projects are small and would not result in excavation or grading at the scale of the Project's construction activities. For these reasons, these projects would not result in cumulative adverse grading and excavation impacts in combination with the Project.

Although the related project sites are also in designated liquefaction zones, the commercial nature of the three related projects is to accommodate existing populations in the area who are likely to already reside or work within the liquefaction area, which is common throughout the eastern San Gabriel Valley. As such, related projects are not expected to introduce new populations to the seismically active region and would not cause a cumulative increase in exposure to seismic hazards. Therefore, cumulative impacts with respect to geologic hazards would be less than significant.

4. MITIGATION MEASURES

With implementation of the recommendations of the Geotechnical Report and Updated Geotechnical Report provided in Subsection c., Project Characteristics or Design Features, the Project would have less than significant impacts on geology and soils; no mitigation measures are required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant, and no mitigation measures would be required.

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4.F GREENHOUSE GAS EMISSIONS

1. INTRODUCTION

This section addresses greenhouse gas (GHG) emissions generated by the construction and operation of the Project, inclusive of mandatory and voluntary energy and resource conservation measures that have been incorporated into the Project to reduce GHG emissions and associated impacts. The analysis also addresses consistency of the Project with applicable regulations, plans, and policies set forth by the State of California and the County to reduce GHGs. The Project's potential contributions to global climate change impacts are identified. GHG emissions calculations prepared for the Project are provided in Appendix E of this Draft EIR.

2. ENVIRONMENTAL SETTING

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however, current data increasingly indicate that the current global conditions differ from past climate changes in rate and magnitude. Global climate change attributable to anthropogenic (human) GHG emissions is one of the most important and widely debated scientific, economic, and political issues in the United States and the world today. The extent to which increased concentrations of GHGs have caused or will cause climate change and the appropriate actions to limit and/or respond to climate change are the subject of significant and rapidly evolving regulatory efforts at the federal and state levels of government.

GHGs are those compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. Not all GHGs possess the same ability to induce climate change; as a result, GHG contributions are commonly quantified in the units of equivalent mass of carbon dioxide (CO₂e). Mass emissions are calculated by converting pollutant specific emissions to CO₂e emissions by applying the proper global warming potential (GWP) value.¹ These GWP ratios are available from the Intergovernmental Panel on Climate Change (IPCC). Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's Second Assessment Report (SAR). The IPCC updated the GWP values based on the latest science in its Fourth Assessment Report (AR4). The updated GWPs in the IPCC AR4 have begun to be used in recent GHG emissions inventories. By applying the GWP ratios, project-related CO₂e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO₂ over a 100-year period is used as a baseline. The CO₂e values are calculated for construction years, as well as existing and Project build-out conditions, to generate a net change in GHG emissions for construction and operation. Compounds that are regulated as GHGs are discussed below.

¹ *GWPs and associated CO₂e values were developed by the Intergovernmental Panel on Climate Change (IPCC). Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's Second Assessment Report (SAR). The IPCC updated the GWP values based on the latest science in its Fourth Assessment Report (AR4). The California Air Resources Board (CARB) has begun reporting GHG emission inventories for California using the GWP values from the IPCC AR4.*

Carbon Dioxide (CO₂): CO₂ is the most abundant GHG in the atmosphere and is primarily generated from fossil fuel combustion from stationary and mobile sources. CO₂ is the reference gas (GWP of 1) for determining the GWPs of other GHGs.

Methane (CH₄): CH₄ is emitted from biogenic sources (i.e., resulting from the activity of living organisms), incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. The GWP of CH₄ is 21 in the IPCC SAR and 25 in the IPCC AR4.

Nitrous Oxide (N₂O): N₂O produced by human-related sources including agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production. The GWP of N₂O is 310 in the IPCC SAR and 298 in the IPCC AR4.

Hydrofluorocarbons (HFCs): HFCs are fluorinated compounds consisting of hydrogen, carbon, and fluorine. They are typically used as refrigerants in both stationary refrigeration and mobile air conditioning systems. The GWPs of HFCs ranges from 140 for HFC-152a to 11,700 for HFC-23 in the IPCC SAR and 124 for HFC-152a to 14,800 for HFC-23 in the IPCC AR4.

Perfluorocarbons (PFCs): PFCs are fluorinated compounds consisting of carbon and fluorine. They are primarily created as a byproduct of aluminum production and semiconductor manufacturing. The GWPs of PFCs range from 6,500 to 9,200 in the IPCC SAR and 7,390 to 17,700 in the IPCC AR4.

Sulfur Hexafluoride (SF₆): SF₆ is a fluorinated compound consisting of sulfur and fluoride. It is a colorless, odorless, nontoxic, nonflammable gas. It is most commonly used as an electrical insulator in high voltage equipment that transmits and distributes electricity. SF₆ has a GWP of 23,900 in the IPCC SAR and 22,800 in the IPCC AR4.

a. Existing Conditions

(1) Greenhouse Gas Emissions Inventory

Worldwide, man-made emissions of GHGs were approximately 49,000 million metric tons (MMT) CO₂e annually, including ongoing emissions from industrial and agricultural sources and emissions from land use changes (e.g., deforestation).² Emissions of CO₂ emissions from fossil fuel use and industrial processes accounts for 65 percent of the total, while CO₂ emissions from all sources accounts for 76 percent of the total. Methane emissions account for 16 percent and N₂O emissions for 6.2 percent. In 2013, the United States was the world's second largest emitter of carbon dioxide at 5,300 MMT. (China was the largest emitter of carbon dioxide at 10,300 MMT.)³

The California Air Resources Board (CARB) compiles GHG inventories for the State of California. Based on the 2013 GHG inventory data (i.e., the latest year for which data are available from CARB), California emitted 459.3 MMTCO₂e, including emissions resulting from imported electrical power and 419.3 MMTCO₂e

² Intergovernmental Panel on Climate Change, *Fifth Assessment Report, Synthesis Report, 2014*.

³ PBL Netherlands Environmental Assessment Agency and the European Commission Joint Research Center, *Trends in Global CO₂ Emissions 2014 Report, 2014*.

excluding emissions related to imported power.⁴ Between 1990 and 2013, the population of California grew by approximately 8.6 million (from 29.8 to 38.4 million).⁵ This represents an increase of approximately 28.9 percent from 1990 population levels. In addition, the California economy, measured as gross State product, grew from \$773 billion in 1990 to \$2.05 trillion in 2013 representing an increase of approximately 165 percent (about two and half times the 1990 gross State product).⁶ Despite the population and economic growth, California's net GHG emissions only grew by approximately 7.7 percent. The California Energy Commission (CEC) attributes the slow rate of growth to the success of California's renewable energy programs and its commitment to clean air and clean energy.⁷ **Table 4.F-1, State of California Greenhouse Gas Emissions**, identifies and quantifies Statewide anthropogenic GHG emissions and sinks (e.g., carbon sequestration due to forest growth) in 1990 and 2013 (i.e., the most recent year in which data are available from CARB). As shown in the table, the transportation sector is the largest contributor to Statewide GHG emissions at 37 percent in 2013. California emissions are due in part to its large size and large population.

(2) Existing Site Greenhouse Gas Emissions

The Project Site is a mostly undeveloped 14.85-acre property which generates no appreciable man-made emissions. Through traffic and commercial parking currently accessing the site due to the Nogales Street Grade Separation Project are not considered relevant existing emissions since parking uses typically do not directly generate trips and therefore would not generate GHG emissions on a regional level. As a result, all development for the Project would be considered new emissions.

(3) Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC, in its *Fifth Assessment Report, Summary for Policy Makers*, stated that, "it is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic forcings together."⁸ A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field

⁴ California Air Resources Board, *California Greenhouse Gas 2000-2013 Inventory by Scoping Plan Category - Summary*, <http://www.arb.ca.gov/cc/inventory/data/data.htm>. Accessed July 2015.

⁵ U.S. Census Bureau, *Data Finders*, <http://www.census.gov/>; California Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties and the State, January 2011-2014, with 2010 Benchmark*, <http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/>. Accessed May 2014.

⁶ California Department of Finance, *Financial & Economic Data: Gross Domestic Product, California*, http://www.dof.ca.gov/HTML/FS_DATA/LatestEconData/FS_Misc.htm. Accessed May 2014. Amounts are based on current dollars as of the date of the report (June 2013).

⁷ California Energy Commission, *Inventory of California Greenhouse Gas Emissions and Sinks 1990 to 2004, December 2006*.

⁸ Intergovernmental Panel on Climate Change, *Fifth Assessment Report, Summary for Policy Makers, 2013, page 15*.

Table 4.F-1

State of California Greenhouse Gas Emissions

Category	Total 1990 Emissions using IPCC SAR (MMTCO ₂ e)	Percent of Total 1990 Emissions	Total 2013 Emissions using IPCC AR4 (MMTCO ₂ e)	Percent of Total 2013 Emissions
Transportation	150.7	35%	169.0	37%
Electric Power	110.6	26%	90.5	20%
Commercial	14.4	3%	13.3	3%
Residential	29.7	7%	28.1	6%
Industrial	103.0	24%	92.7	20%
Recycling and Waste ^a	-	-	8.9	2%
High GWP/Non-Specified ^b	1.3	<1%	18.5	4%
Agriculture/Forestry	23.6	6%	36.2	8%
Forestry Sinks	-6.7		- ^c	-
Net Total (IPCC SAR)	426.6	100%	--	--
Net Total (IPCC AR4) ^d	431	100%	459.3	100%

^a Included in other categories for the 1990 emissions inventory.

^b High GWP gases are not specifically called out in the 1990 emissions inventory.

^c Revised methodology under development (not reported for 2012).

^d CARB revised the State's 1990 level GHG emissions using GWPs from the IPCC AR4.

Sources: California Air Resources Board, Staff Report – California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit, (2007); California Air Resources Board, “California Greenhouse Gas 2000-2012 Inventory by Scoping Plan Category – Summary,” <http://www.arb.ca.gov/cc/inventory/data/data.htm>. Accessed March 2015.

support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.⁹

According to CARB, the potential impacts in California due to global climate change may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, more drought years, increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems, and increased pest infestation.¹⁰ Below is a summary of some of the potential effects, reported by an array of studies that could be experienced in California as a result of global warming and climate change.

⁹ Anderegg, William R. L., Prall, James W., Harold, Jacob, Schneider, Stephen H., Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America, 107:12107-12109, April 9, 2010.

¹⁰ California Environmental Protection Agency, Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.

(a) Air Quality

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the State.¹¹

In 2009, the California Natural Resources Agency (CNRA) published the *California Climate Adaptation Strategy*¹² as a response to the Governor's Executive Order S-13-2008. The CNRA report lists specific recommendations for State and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the *California Climate Adaptation Strategy*, the CEC was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers.¹³ The website, known as Cal-Adapt, became operational in 2011.¹⁴ The information provided from the Cal-Adapt website represents a projection of potential future climate scenarios. The data comprise the average values from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. According to the Cal-Adapt website, the portion of the County of Los Angeles in which the Project Site is located (near Rowland Heights) could result in an average increase in temperature of approximately five to nine percent (about 3.5 to 6°F) by 2070-2090, compared to the baseline 1961-1990 period.

(b) Water Supply

Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change."¹⁵ For example, some studies identify little change in total annual precipitation in projections for California, while others show significantly more precipitation.¹⁶ Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full.¹⁷ Conversely, reductions in spring runoff and higher

¹¹ California Energy Commission, *Scenarios of Climate Change in California: An Overview, February 2006*, <http://www.energy.ca.gov/2005publications/CEC-500-2005-186/CEC-500-2005-186-SF.PDF>. Accessed March 2015.

¹² California Natural Resources Agency, *2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009*.

¹³ *Ibid.*

¹⁴ California Energy Commission, *Cal-Adapt website*, <http://cal-adapt.org>.

¹⁵ Pacific Institute for Studies in Development, Environment and Security, *Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003*. http://pacinst.org/wp-content/uploads/sites/21/2013/04/climate_change_and_california_water_resources.pdf. Accessed March 2015.

¹⁶ *Ibid.*

¹⁷ *Ibid.*

evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.¹⁸

The California Department of Water Resources report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that “climate change will likely have a significant effect on California’s future water resources...[and] future water demand.” It also reports that “much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain.” It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but “[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future.” Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows.¹⁹ In its *Fifth Assessment Report*, the IPCC states “Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions.”²⁰

(c) Hydrology and Sea Level Rise

As discussed above, climate changes could potentially affect the amount of snowfall, rainfall and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide, and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California’s water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

(d) Agriculture

California has a \$30 billion agricultural industry that produces half the country’s fruits and vegetables. Higher CO₂ levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase, crop-yield could be threatened by a less reliable water supply, and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops—such as wine grapes—bloom or ripen, and thus affect their quality.²¹

¹⁸ *Ibid.*

¹⁹ California Department of Water Resources, *Progress on Incorporating Climate Change into Planning and Management of California’s Water Resources, July 2006*, <http://www.water.ca.gov/climatechange/docs/DWRClimateChangeJuly06.pdf>. Accessed March 2015.

²⁰ Intergovernmental Panel on Climate Change, *Fifth Assessment Report, Summary for Policy Makers, 2013*, page 20.

²¹ California Climate Change Center, *Our Changing Climate: Assessing the Risks to California, July 2006*.

(e) Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2-11.5°F (1.1-6.4°C) by 2100, with significant regional variation.²² Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as two feet along most of the U.S. coast. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events, (2) geographic range, (3) species' composition within communities, and (4) ecosystem processes such as carbon cycling and storage.^{23, 24}

b. Regulatory Framework Summary

(1) Federal

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, methane and other non-CO₂ gases, agricultural practices, and implementation of technologies to achieve GHG reductions. The USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the Energy Star labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

On May 19, 2009, the President announced a national policy for fuel efficiency and emissions standards in the United States auto industry. The federal standard adopted in 2010 applies to passenger cars and light-duty trucks for model years 2012 through 2016. The rule surpasses the prior Corporate Average Fuel Economy standards and requires an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO₂ per mile by model year 2016, based on USEPA calculation methods. In August 2012, standards were adopted for model year 2017 through 2025 passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg and 163 grams of CO₂ per mile. According to the USEPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle.²⁵

On December 7, 2009, the USEPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the federal Clean Air Act. The USEPA adopted a Final Endangerment Finding for the six defined GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) on December 7, 2009. The USEPA also adopted a Cause or Contribute Finding in which the USEPA Administrator found that GHG emissions from new motor vehicle and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare.

²² National Research Council of the National Academies, *Advancing the Science of Climate Change*, 2010.

²³ Parmesan, C., *Ecological and Evolutionary Response to Recent Climate Change*, 2004.

²⁴ Parmesan, C and Galbraith, H, *Observed Impacts of Global Climate Change in the U.S. Prepared for the Pew Center on Global Climate Change*, November 2004.

²⁵ U.S. Environmental Protection Agency, "EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks," August 2012, <http://www.epa.gov/oms/climate/documents/420f12051.pdf>. Accessed March 2015.

These findings do not themselves impose any requirements on industry or other entities. However, these actions were a prerequisite for implementing GHG emissions standards for vehicles.

(2) State

California has promulgated a series of executive orders, laws, and regulations aimed at reducing both the level of GHGs in the atmosphere and emissions of GHGs from commercial and private activities within the State.

(a) California Air Resources Board

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and State air pollution control programs within California. In this capacity, CARB conducts research, sets the California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan, for which it works closely with the federal government and the local air districts. The State Implementation Plan is required for the State to take over implementation of the federal Clean Air Act.

(b) Executive Order S-3-05

California Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels;
- By 2020, California shall reduce GHG emissions to 1990 levels; and
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

The Secretary of CalEPA is required to coordinate efforts of various agencies to collectively and efficiently reduce GHGs. Some of the agency representatives involved in the GHG reduction plan include the Secretary of the Business, Transportation and Housing Agency, the Secretary of the Department of Food and Agriculture, the Secretary of the Resources Agency, the Chairperson of CARB, the Chairperson of the California Energy Commission, and the President of the Public Utilities Commission. Representatives from these agencies comprise the California Climate Action Team (CAT).

The CAT provides biennial reports to the Governor and Legislature on the state of GHG reductions in the State, as well as strategies for mitigating and adapting to climate change. The first CAT Report to the Governor and the Legislature in 2006 contained recommendations and strategies to help meet the targets in Executive Order S 3-05.²⁶ The 2010 CAT Report, finalized in December 2010, expands on the policy oriented

²⁶ *California Environmental Protection Agency, Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.*

2006 assessment.²⁷ The new information detailed in the CAT Report includes development of revised climate and sea-level projections using new information and tools that have become available in the last two years, together with an evaluation of climate change within the context of broader social changes, such as land-use changes and demographic shifts.

(c) California Assembly Bill 32 (AB 32, Nunez) (Chapter 488, Statutes of 2006)

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (Chapter 488, Statutes of 2006), the California Global Warming Solutions Act of 2006, focusing on reducing Statewide GHG emissions in California to 1990 levels by 2020. As required by AB 32, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. The 2020 emissions limit was originally set at 427 MMTCO_{2e} using the GWP values from the IPCC SAR. CARB also projected the State's 2020 GHG emissions under business-as-usual (BAU) conditions—that is, emissions that would occur without any plans, policies, or regulations to reduce GHG emissions. CARB originally used an average of the State's GHG emissions from 2002 through 2004 and projected the 2020 levels at approximately 596 MMTCO_{2e} (using GWP values from the IPCC SAR). Therefore, under the original projections, the State must reduce its 2020 BAU emissions by 28.4 percent in order to meet the 1990 target of 427 MMTCO_{2e}. In 2014, CARB revised the target using the GWP values from the IPCC AR4 and determined that the 1990 GHG emissions inventory and 2020 GHG emissions limit is 431 MMTCO_{2e}. CARB also updated the State's 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that were recently adopted for motor vehicles and renewable energy.²⁸ CARB's revised 2020 BAU emissions estimate using the GWP values from the IPCC AR4 is 509.4 MMTCO_{2e}. Therefore, the emission reductions necessary to achieve the 2020 emissions target of 431 MMTCO_{2e} would be 78.4 MMTCO_{2e}, or a reduction of GHG emissions by approximately 15.4 percent. A summary of the GHG emissions reductions required under AB 32 is provided in **Table 4.F-2, *Estimated Greenhouse Gas Emissions Reductions Required by AB 32.***

AB 32 defines GHGs as CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆ and represents the first enforceable Statewide program to limit emissions of these GHGs from all major industries, with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under AB 32, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing State actions that would achieve GHG emissions reductions equivalent to 1990 Statewide levels by 2020. On or before June 30, 2007, CARB was required to publish a list of discrete early action GHG emission reduction measures that would be implemented to be made enforceable by 2010. In 2007, CARB published its Final Report for Proposed Early Actions to Mitigate Climate Change in California.²⁹ This report described recommendations for discrete early action measures to reduce GHG emissions as part of California's AB 32 GHG reduction strategy. Resulting from this are three new regulations proposed to meet the definition of “discrete early action greenhouse gas reduction measures,” including the following: a low carbon fuel standard, reduction of HFC 134a (HFC used in automobile air-conditioning systems) emissions from non-professional servicing of motor vehicle air conditioning systems, and improved landfill

²⁷ California Environmental Protection Agency, *Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, December 2010.*

²⁸ California Air Resources Board, “2020 Business-as-Usual (BAU) Emissions Projection, 2014 Edition,” <http://www.arb.ca.gov/cc/inventory/data/bau.htm>. Accessed March 2015.

²⁹ California Air Resources Board, *Proposed Early Actions to Mitigation Climate Change in California, 2007.*

Table 4.F-2

Estimated Statewide Greenhouse Gas Emissions Reductions Required by AB 32

Emissions Category	GHG Emissions (MMTCO ₂ e)
2008 Scoping Plan (IPCC SAR)	
2020 BAU Forecast (CARB 2008 Scoping Plan Estimate)	596
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	427
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2020	169 (28.4%)^a
2011 Scoping Plan (IPCC AR4)	
2020 BAU Forecast (CARB 2011 Scoping Plan Estimate)	509.4
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	431
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2020	78.4 (15.4%)^{b, c}

MMTCO₂e = million metric tons of carbon dioxide equivalents

^a $596 - 427 = 169 / 596 = 28.4\%$

^b $509.4 - 431 = 78.4 / 509.4 = 15.4\%$

^c The reduction target using the GWP values from the IPCC SAR was 15.8 percent.

Source: California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011; California Air Resources Board, "2020 Business-as-Usual (BAU) Emissions Projection, 2014 Edition," <http://www.arb.ca.gov/cc/inventory/data/bau.htm>. Accessed March 2015.

gas capture. CARB estimates that by 2020, the reductions from these three measures would range from 13 to 26 MMTCO₂e. Six additional early-action regulations were adopted on October 25, 2007 that targeted motor vehicles, auxiliary engines from docked ships PFCs from the semiconductor industry, propellants in consumer products, automotive maintenance, and SF₆ from non-electricity sectors.

(d) California Assembly Bill No. 1493 (AB 1493, Pavley), (Chapter 200, Statutes of 2002)

In response to the transportation sector accounting for more than half of California's CO₂ emissions, AB 1493 (Chapter 200, Statutes of 2002), enacted on July 22, 2002, required CARB to set GHG emission standards for passenger vehicles, light duty trucks, and other vehicles whose primary use is noncommercial personal transportation manufactured in and after 2009. In setting these standards, CARB considered cost effectiveness, technological feasibility, economic impacts, and providing maximum flexibility to manufacturers. The State of California in 2004 submitted a request for a waiver from federal clean air regulations, which ordinarily preempts State regulation of motor vehicle emission standards, to allow the State to require reduced tailpipe emissions of CO₂. In late 2007, the USEPA denied California's waiver request. In early 2008, the State brought suit against USEPA related to this denial. In January 2009, the President directed the USEPA to assess whether its denial of the waiver was appropriate under the federal Clean Air Act. In June 2009, the USEPA granted California the waiver.

However, as discussed previously, the USEPA and USDOT have adopted federal standards for model year 2012 through 2016 light-duty vehicles. In light of the USEPA and USDOT standards, California—and states adopting California emissions standards—have agreed to defer to the proposed national standard through

model year 2016. The 2016 endpoint of the federal and State standards is similar, although the federal standard ramps up slightly more slowly than required under the State standard. The State standards (called the Pavley standards) require additional reductions in CO₂ emissions beyond model year 2016 (referred to as Pavley Phase II standards). As noted above, the USEPA and USDOT have adopted GHG emission standards for model year 2017 through 2025 vehicles. These standards are slightly different from the Pavley Phase II standards, but the State of California has agreed not to contest these standards, in part due to the fact that while the national standard would achieve slightly less reductions in California, it would achieve greater reductions nationally and is stringent enough to meet State GHG emission reduction goals.³⁰ On November 15, 2012, CARB approved an amendment that allows manufacturers to comply with the 2017-2025 national standards to meet State law.

(e) Executive Order S-01-07

Executive Order S-01-07 was enacted by the Governor on January 18, 2007. The order mandates the following: (1) that a Statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020, and (2) that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established in California.

(f) Senate Bill 97 (SB 97, Dutton) (Chapter 185, Statutes of 2007)

Senate Bill (SB) 97 (Chapter 185, Statutes of 2007), enacted in 2007, amended CEQA to clearly establish that GHG emissions and the effects of GHG emissions are appropriate subjects for CEQA analysis. It directed the California Office of Planning and Research to develop revisions to the State *CEQA Guidelines* "for the mitigation of GHG emissions or the effects of GHG emissions" and directed the Resources Agency to certify and adopt these revised State *CEQA Guidelines* by January 2010. The revisions were completed in March 2010 and codified into the California Code of Regulations and became effective within 120 days pursuant to CEQA. The amendments provide regulatory guidance for the analysis and mitigation of the potential effects of GHG emissions. The CEQA Guidelines require:

- Inclusion of GHG analyses in CEQA documents;
- Determination of significance of GHG emissions; and
- If significant GHG emissions would occur, adoption of mitigation to address significant emissions.

(g) Senate Bill 375 (SB 375, Steinberg) (Chapter 728, Statutes of 2008)

SB 375 (Chapter 728, Statutes of 2008), which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the State on September 30, 2008. Under SB 375, CARB is required, in consultation with the Metropolitan Planning Organization, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. On September 23, 2010, CARB adopted the vehicular GHG emissions reduction targets for the Southern California Association of Governments (SCAG), which is the Metropolitan Planning Organization for the region in which the County of Los Angeles is located. The target is a per capita reduction of eight percent for 2020 and 13 percent for 2035 compared to the 2005 baseline. Of note, the proposed reduction targets

³⁰ California Air Resources Board, "Advanced Clean Cars Summary," http://www.arb.ca.gov/msprog/clean_cars/acc%20summary-final.pdf. Accessed March 2015.

explicitly exclude emission reductions expected from the AB 1493 and the low carbon fuel standard regulations.

Under SB 375, the target must be incorporated within that region's Regional Transportation Plan (RTP), which is used for long-term transportation planning, in a Sustainable Communities Strategy (SCS). Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plan) are not required to be consistent with either the RTP or SCS. On April 4, 2012, SCAG adopted the *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy*.³¹ Using growth forecasts and economic trends, the *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy* provides a vision for transportation throughout the region for the next 20 years. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy* successfully achieves and exceeds the GHG emission-reduction targets set by CARB by demonstrating a 9 percent reduction by 2020 and 16 percent reduction by 2035 compared to the 2005 level on a per capita basis.

SCAG's Sustainable Communities Strategy provides specific strategies for successful implementation. These strategies include supporting projects that encourage a diverse job opportunities for a variety of skills and education, recreation and culture and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles. It is anticipated that SCAG will update the Sustainable Communities Strategy in 2016 and evaluate progress in implementing the strategies.

(h) Title 24, Building Standards Code and CALGreen Code

The California Energy Commission first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Standards Code is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) planning and design, (2) energy efficiency, (3) water efficiency and conservation, (4) material

³¹ *Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2012, <http://rtpscs.scag.ca.gov/Pages/2012-2035-RTP-SCS.aspx>. Accessed March 2015.*

conservation and resource efficiency, and (5) environmental air quality.”³² The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. When the CALGreen Code went into effect in 2009, compliance through 2010 was voluntary. As of January 1, 2011, the CALGreen Code is mandatory for all new buildings constructed in the State. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. The CALGreen Code was most recently updated in 2013 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on January 1, 2014 (the energy provisions took effect on July 1, 2014).³³

(i) Senate Bill 1078 (SB 1078, Sher) (Chapter 516, Statutes of 2002) and Senate Bill 107 (SB 107, Simitian) (Chapter 464, Statutes of 2006) and Executive Order S-14-08

SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. In November 2008, Governor Schwarzenegger signed Executive Order S-14-08, which expands the State's Renewables Portfolio Standard (RPS) to 33 percent renewable power by 2020. Pursuant to Executive Order S-21-09, CARB was also preparing regulations to supplement the RPS with a Renewable Energy Standard that will result in a total renewable energy requirement for utilities of 33 percent by 2020. But on April 12, 2011, Governor Jerry Brown signed SB X1-2 to increase California's RPS to 33 percent by 2020.

(j) California Senate Bill 1368

California SB 1368, a companion bill to AB 32, requires the California Public Utilities Commission (CPUC) and the CEC to establish GHG emission performance standards for the generation of electricity. These standards will also generally apply to power that is generated outside of California and imported into the State. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB 32. On January 25, 2007, the CPUC adopted an interim GHG Emissions Performance Standard, which is a facility-based emissions standard requiring that all new long-term commitments for baseload generation to serve California consumers be with power plants that have GHG emissions no greater than a combined cycle gas turbine plant. That level is established at 1,100 pounds of CO₂ per megawatt-hour. Further, on May 23, 2007, the CEC adopted regulations that establish and implement an identical Emissions Performance Standard of 1,100 pounds of CO₂ per megawatt-hour.

(k) Executive Order B-30-15

On April 29, 2015, Governor Jerry Brown issued Executive Order B-30-15, which:

- Established a new interim Statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030,
- Ordered all State agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets, and

³² *California Building Standards Commission, Title 24, California Code of Regulations, Part 11, 2010 California Green Building Standards Code (CalGreen), 2010.*

³³ *California Energy Commission, Building Standards Information Bulletin 13-07, December 18, 2013.*

- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

CARB subsequently expressed its intention to initiate the Climate Change Scoping Plan update during the summer of 2015, with adoption scheduled for 2016.

(I) Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions. CARB asserts that this program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established and facilities subject to the cap will be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program³⁴ pursuant to its authority under AB 32. The development of this Program included a multi-year stakeholder process and consideration of potential impacts on disproportionately impacted communities. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed “covered entities”) by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32’s emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors³⁵ (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the Program’s duration.

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities that emit more than 25,000 MTCO₂e per year must comply with the Cap-and-Trade Program.³⁶ Triggering of the 25,000 MTCO₂e per year “inclusion threshold” is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or “MRR”).³⁷

Each covered entity with a compliance obligation is required to surrender “compliance instruments”³⁸ for each MTCO₂e of GHG they emit. Covered entities are allocated free allowances in whole or part (if eligible), buy allowances at auction, purchase allowances from others, or purchase offset credits. A “compliance period” is the time frame during which the compliance obligation is calculated. The years 2013 and 2014 are the first compliance period, the years 2015–2017 are the second compliance period, and the third compliance period is from 2018–2020. At the end of each compliance period, each facility will be required to surrender compliance instruments to CARB equivalent to their total GHG emissions throughout the compliance period. There also are requirements to surrender compliance instruments covering 30 percent

³⁴ 17 CCR §§ 95800 to 96023.

³⁵ See generally 17 CCR §§ 95811, 95812.

³⁶ 17 CCR § 95812.

³⁷ 17 CCR §§ 95100-95158.

³⁸ Compliance instruments are permits to emit, the majority of which will be “allowances,” but entities also are allowed to use CARB-approved offset credits to meet up to 8 percent of their compliance obligations.

of the prior year's compliance obligation by November of each year. For example, in November 2014, a covered entity was required to submit compliance instruments to cover 30 percent of its 2013 GHG emissions.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in its First Update to the Climate Change Scoping Plan:

*The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. **But as the cap declines, aggregate emissions must be reduced.***³⁹

In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program. However, as climate change is a global phenomenon and the effects of GHG emissions are considered cumulative in nature, a focus on aggregate GHG emissions reductions is warranted.

Further, the reductions in GHG emissions that will be achieved by the Cap-and-Trade Program inherently are variable and, therefore, impossible to quantify with precision:

*The Cap-and-Trade Regulation is different from most of the other measures in the Scoping Plan. The [R]egulation sets a hard cap, instead of an emission limit, so the emission reductions from the program vary as our estimates of "business as usual" emissions in the future are updated. In addition, the Cap-and-Trade Program works in concert with many of the direct regulatory measures—providing an additional economic incentive to reduce emissions. Actions taken to comply with direct regulations reduce an entity's compliance obligation under the Cap-and-Trade Regulation. So, for example, increased deployment of renewable electricity sources reduces a utility's compliance obligation under the Cap-and-Trade Regulation.*⁴⁰

If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. In other words, the Cap-and-Trade Program functions sort of like an insurance policy for meeting California 2020's GHG emissions reduction mandate:

The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the "capped sectors." Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance

³⁹ CARB, *First Update to the Climate Change Scoping Plan: Building on the Framework*, at 86 (May 2014) (emphasis added).

⁴⁰ *Ibid.*

*efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap.*⁴¹

*[T]he Cap-and-Trade Regulation provides assurance that California's 2020 limit will be met because the regulation sets a firm limit on 85 percent of California's GHG emissions.*⁴²

In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory architecture adopted by CARB under AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.⁴³ Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.⁴⁴ While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation (i.e., they were not fully regulated) until 2015:

*Suppliers of natural gas, suppliers of RBOB [Reformulated Gasoline Blendstock for Oxygenate Blending] and distillate fuel oils, suppliers of liquefied petroleum gas, and suppliers of liquefied natural gas specified in sections 95811(c), (d), (e), (f), and (g) that meet or exceed the annual threshold in section 95812(d) **will have a compliance obligation beginning with the second compliance period.***⁴⁵

As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions.

The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). However, transportation fuels that are "supplied" in California, but can be demonstrated to have a final destination outside California, do not generate a compliance obligation. The underlying concept here is that CARB is seeking to capture tailpipe GHG

⁴¹ CARB, *First Update to the Climate Change Scoping Plan: Building on the Framework*, at 88 (May 2014)

⁴² *Id.* at 86-87.

⁴³ 17 CCR § 95811(b).

⁴⁴ 17 CCR §§ 95811, 95812(d).

⁴⁵ *Id.* at § 95851(b)(emphasis added).

emissions from the combustion of transportation fuels supplied to California end-users. Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle-miles traveled (VMT) are covered by the Cap-and-Trade Program.

(3) Regional

As described in Section 4.B, Air Quality, the Project Site is located in the South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside Counties, in addition to the San Geronio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

After AB 32 was passed, SCAQMD formed a Climate Change Committee, along with a Greenhouse Gases CEQA Significance Thresholds Working Group and the SoCal Climate Solutions Exchange Technical Advisory Group. On September 5, 2008, the SCAQMD Board approved the SCAQMD Climate Change Policy, which outlines actions the SCAQMD will take to assist businesses and local governments in implementing climate change measures, decrease the agency's carbon emissions, and provide information to the public regarding climate change. On December 5, 2008, the Board approved interim CEQA GHG significance thresholds for stationary source projects where it is the lead agency. The threshold is a tiered approach to determine a project's significance, with 10,000 MT of CO₂e as a screening numerical threshold for stationary source projects. To provide guidance to local lead agencies on determining the significance of GHG emissions identified in CEQA documents, the GHG CEQA Significance Threshold Working Group drafted thresholds with the intent of capturing 90 percent of development projects.⁴⁶ Under Tiers 1 and 2, projects that are exempt from CEQA or consistent with an approved local GHG reduction plan can be found to be less than significant. Under Tier 3, a project's GHG emissions are compared to the draft screening thresholds. At present, the SCAQMD has not formally adopted thresholds for use by other lead agencies, but recommends that industrial projects utilize the 10,000 MTCO₂e screening level that has been adopted for SCAQMD projects. The GHG CEQA Significance Threshold Working Group drafted a significance indicator of 3,000 MTCO₂e for mixed-use or all land use projects, but it has not been formally adopted. Under Tier 4, a project's GHG emissions are compared to a performance standard, such as achieving a percentage reduction in GHG emissions from a base case scenario or achieving a project-level efficiency target of 4.8 MTCO₂e per service population.

(4) Local

(a) County of Los Angeles General Plan

The Los Angeles County 1980 General Plan provides the fundamental basis for the County's land use and development policy, and addresses all aspects of development including public health, land use, community

⁴⁶ South Coast Air Quality Management District, "Greenhouse Gases (GHG) CEQA Significance Thresholds," GHG Meeting 15 Main Presentation, September 28, 2010, <http://www.aqmd.gov/ceqa/handbook/GHG/2010/sept28mtg/sept29.html>. Accessed March 2015.

character, transportation, economics, housing, air quality, and other topics. The General Plan sets forth objectives, policies, standards, and programs for land use and new development, Circulation and Public access, and Service Systems for the Community as a whole. Measures related to GHG emissions that would be applicable to the Project are contained in the Los Angeles County General Plan 1980 Conservation and Open Space element. Project consistency with the General Plan is discussed in Section 4.H, Land Use and Planning.

(b) County of Los Angeles Community Climate Action Plan

The County of Los Angeles has adopted a Community Climate Action Plan (CCAP),⁴⁷ a component of the General Plan, which sets a target to reduce GHG emissions from community activities in the unincorporated areas of Los Angeles County by at least 11 percent below 2010 levels by 2020. The CCAP describes the County's plan for achieving this goal, including specific strategy areas for each of the major emissions sectors, and provides details on the 2010 and projected 2020 emissions in the unincorporated areas. The actions in the CCAP are priority actions and intended for near-term implementation, such that the County can achieve its GHG reduction goal for 2020 for the unincorporated areas of Los Angeles County.

The CCAP includes 26 local actions to reduced GHG emissions and are grouped into the following five strategy areas:

- Green Building and Energy;
- Land Use and Transportation;
- Water Conservation and Wastewater;
- Waste Reduction, Reuse, and Recycling; and
- Land Conservation and Tree Planting.

The County considers many of the local actions to be cost effective, particularly in the green building and energy strategy area. In addition to reducing GHG emissions, all local actions have many co-benefits, such as improved public health, improved air quality, energy savings, increased mobility, and enhanced community well-being.

The CCAP is a resource for the unincorporated areas of the County. Public agencies and private developers can also use the CCAP to comply with project-level review requirements pursuant to CEQA. CEQA Guidelines specify that CEQA project evaluation of GHG emissions can "tier off" a programmatic analysis of GHG emissions, provided that the programmatic analysis (or climate action plan) does the following (CEQA Guidelines Section 15183.5):

- Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.

⁴⁷ *County of Los Angeles, Final Unincorporated Los Angeles County Community Climate Action Plan 2020, (August 2015).*

- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area.
- Specify measures or a group of measures, including performance standards that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.
- Monitor the plan's progress.
- Adopt the GHG Reduction Strategy in a public process following environmental review.

The CCAP meets CEQA Guidelines Section 15183.5 listed above by: (1) quantifying all primary sectors of GHG emissions within the unincorporated areas for 2010 and 2020; (2) including a reduction target of at least 11 percent below 2010 levels, which is consistent with the recommendations in the AB 32 Scoping Plan for municipalities to support the overall AB 32 reduction targets; (3) analyzing community emissions for the unincorporated areas as a whole and including predicted growth expected by 2020; (4) including specific measures to achieve the overall reduction target; (5) including periodic monitoring of plan progress; and (6) submitting the CCAP to be adopted in a public process following compliance with CEQA.

(c) City of Industry General Plan

The City of Industry General Plan also contains policies aimed at reducing GHG emissions within the City. Although the General Plan does not contain a GHG plan, other General Plan elements such as Circulation and Resource Management contain policies related to GHG emissions.

The City of Industry General Plan was updated in 2014 to set forth objectives, policies, standards, and programs for land use and new development, circulation, and resource management for the community as a whole. Applicable measures in the Resource Management element are specified below as being the most current standards. These measures would be implemented as applicable in connection with development of the Project.⁴⁸

Goal RM2 Improved air quality and reduced greenhouse gas emissions

Policy RM2-1 Comply with State building codes relative to indoor air quality.

Policy RM2-3 Collaborate with the CARB and other agencies within the South Coast Air Basin to improve regional air quality and achieve GHG reduction targets.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The evaluation of potential impacts to GHG emissions that may result from the construction and long-term operations of the Project has been conducted as described below.

⁴⁸ *City of Industry General Plan Update, adopted June 12, 2014. Accessed July 2015.*

(1) Greenhouse Gas Emissions

(a) Existing Project Site Emissions

The Project Site currently is mostly undeveloped and generates no appreciable man-made emissions. Although wind-blown dust may emanate from the Project Site, the dust is considered negligible. Through traffic and commercial parking currently accessing the site due to the Nogales Street Grade Separation Project are not considered relevant existing emissions since parking uses typically do not generate trips directly and therefore would not generate GHG emissions on a regional level. Thus, all development for the Project would be considered new emissions.

(b) Project Consistency with CCAP

The significance of the Project's GHG emissions are evaluated by evaluating the consistency of the Project with applicable GHG reduction strategies and local actions in the County of Los Angeles CCAP. As discussed previously, the CCAP meets CEQA Guidelines Section 15183.5, which means that project-specific environmental documents that incorporate applicable CCAP actions may "tier off" the EIR certified for the County General Plan and CCAP to meet project-level CEQA evaluation requirements for GHG emissions. Projects that demonstrate consistency with applicable CCAP actions can be determined to have a less than significant cumulative impact on GHG emissions and climate change (notwithstanding substantial evidence that warrants a more detailed review of project-level GHG emissions).

(c) Project-Related Emissions (Provided for Informational Purposes)

For the purposes of this EIR, total GHG emissions from the Project were quantified to provide information to decision makers and the public regarding the level of the Project's annual GHG emissions. The CCAR has prepared the General Reporting Protocol for calculating and reporting GHG emissions from a number of general and industry-specific activities.⁴⁹ No specific protocols are available for land use projects, so the General Reporting Protocol has been adapted to address GHG emissions from the Project. The information provided in this section is consistent with the General Reporting Protocol minimum reporting requirements. The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include:

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel)
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy⁵⁰

CARB believes that consideration of so-called indirect emissions provides a more complete picture of the GHG footprint of a facility: "As facilities consider changes that would affect their emissions – addition of a cogeneration unit to boost overall efficiency even as it increases direct emissions, for example – the relative impact on total (direct plus indirect) emissions by the facility should be monitored. Annually reported indirect energy usage also aids the conservation awareness of the facility and provides information" to CARB

⁴⁹ California Climate Action Registry, *General Reporting Protocol Version 3.1, January 2009*.

⁵⁰ Embodied energy includes energy required for water pumping and treatment for end-uses.

to be considered for future strategies by the industrial sector.⁵¹ For these reasons, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the Office of Planning and Research directs lead agencies to “make a good-faith effort, based on available information, to calculate, model, or estimate GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities.”⁵² Therefore, direct and indirect emissions have been calculated for the Project.

For purposes of this analysis, it is considered reasonable and consistent with criteria pollutant calculations to consider those GHG emissions resulting from Project-related emissions in the use of on-road mobile vehicles, electricity, and natural gas. This includes Project construction activities such as demolition, hauling, and construction worker trips. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from GHG emissions are long term rather than acute, GHG emissions are calculated on an annual basis. In order to report total GHG emissions using the CO₂e metric, the GWP ratios corresponding to the warming potential of CO₂ over a 100-year period is used in this analysis.

Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors. The emissions are estimated using the CalEEMod (Version 2013.2.2) software, an emissions inventory software program recommended by the SCAQMD. CalEEMod is based on outputs from OFFROAD2011 and EMFAC2011, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles. The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions used in the criteria pollutant analysis (see Section 4.B, Air Quality, in this Draft EIR) to generate GHG emissions values for each construction year. CalEEMod outputs construction-related GHG emissions of CO₂, CH₄, N₂O, and CO₂e. The values are derived from factors published in the *2006 Intergovernmental Panel on Climate Change Guidelines for National Greenhouse Gas Inventories*.⁵³ These values are then converted to metric tons for consistency. The CO₂e emissions are calculated for the construction period and future Project build-out conditions in order to estimate the net change in GHG emissions for Project construction and operation. In accordance with SCAQMD guidance, GHG emissions from construction have been amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate comparable to operational emissions). Detailed construction GHG emissions calculations are provided in Appendix E of this Draft EIR.

Mobile source emission calculations associated with operation of the Project are also calculated using the CalEEMod model. In calculating mobile-source emissions, the trip length values for the mixed-use project are based on CalEEMod provided defaults for the relevant land uses (hotel, office, retail, and restaurant land uses). The trip distances for the various operational activities were multiplied by the average daily trip

⁵¹ California Air Resources Board, *Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32)*, October 19, 2007.

⁵² State of California, Governor’s Office of Planning and Research, *Technical Advisory, CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act Review*, June 19, 2008, p. 5.

⁵³ *Intergovernmental Panel on Climate Change, 2006 Intergovernmental Panel on Climate Change Guidelines for National Greenhouse Gas Inventories, 2006.*

estimates for each land use based on the data provided by the Project traffic study to estimate the average daily VMT.⁵⁴ Since GHG emission impacts are assessed on an annual basis, the average daily VMT for each land use were multiplied by the number of days each land use would be in operation in a year. The estimated VMT takes into account trip reductions based on applicable physical and operational Project characteristics, including internal capture from co-locating commercial and residential uses on the Project Site and transit and pedestrian trips. Mobile source calculations utilize EMFAC2011 and the CCAR General Reporting Protocol, Version 3.1, to generate emission factors for CO₂, CH₄, and N₂O. These emission factors are then applied to the annual VMT to obtain annual mobile source GHG emissions.

With regard to energy usage, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Future fuel consumption rates are estimated based on specific square footage of the hotel, office, retail, and restaurant land uses, as well as predicted water supply needs of the Project. Energy usage (off-site electricity generation and on-site natural gas consumption) for the Project is calculated within CalEEMod using the CEC's California Commercial End-Use Survey (CEUS) data set.⁵⁵ This data set provides energy intensities of different land uses throughout the State and different climate zones. However, since the data from the CEUS is from 2002, the CalEEMod software incorporates correction factors to account for compliance with the Title 24 Building Standards Code. As the Title 24 Building Standards have been updated since the latest version of CalEEMod was released, adjustment factors have been applied to account for updated energy efficiency standards. In addition, emission rates due to electricity generation have been updated to account for RPS requirements.⁵⁶

Water and wastewater generated from the Project require energy to supply, distribute, and treat. Refer to Section 4.L.2, *Water Supply*, of this Draft EIR for the estimated water usage rate for the Project. The CalEEMod software uses the electrical intensity factors from the 2006 CEC report *Refining Estimates of Water-Related Energy Use in California*.⁵⁷ The emissions of GHGs associated with the wastewater treatment process emissions are also calculated using the CalEEMod software as described in the *California Emissions Estimator Model User's Guide, Appendix A*.⁵⁸

Emissions from solid waste handling generated from the Project are also accounted for in the GHG emissions inventory. The GHG emission factors, particularly for CH₄, are based on the default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery).

Other sources of GHG emissions from operation of the Project include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod tool uses landscaping equipment GHG emission factors from the CARB OFFROAD2011 model and the CARB *Technical Memo: Change in Population*

⁵⁴ Kunzman and Associates, Inc., *Traffic Impact Analysis, Rowland Heights Plaza, May 2015*.

⁵⁵ California Energy Commission, *California Commercial End-Use Survey*, <http://capabilities.itron.com/CeusWeb/Chart.aspx>. Accessed December 2013.

⁵⁶ *Project Characteristics - California Air Resources Board, Statewide Emission Factors (EF) For Use With AB 900 Projects, March 2014. The emission factor of 595 lbs CO₂/MWh is from the California LEV III Initial Statement Of Reasons (ISOR, Dec. 7, 2011), <http://www.arb.ca.gov/regact/2012/leviiighg2012/leviiighg2012.htm>, based on analysis with CA-GREET model.*

⁵⁷ California Energy Commission, *Refining Estimates of Water-Related Energy Use in California, PIER Final Project Report, CEC-500-2006-118,(2006*.

⁵⁸ California Air Pollution Control Officers Association, *California Emissions Estimator Model User's Guide, 2013*.

and Activity Factors for Lawn and Garden Equipment (6/13/2003).⁵⁹ The CalEEMod software estimates that landscaping equipment operate for 250 days per year in the South Coast Air Basin.

Emissions calculations for the Project include credits or reductions for the Project Design Features and GHG reducing measures which are required by regulation, such as reductions in energy and water demand. Since the Project is subject to the County's Green Building Standards Code, Project Design Features have been incorporated consistent with the minimum USGBC Leadership in Energy and Environmental Design (LEED®) Silver rating.

The California Air Pollution Control Officers Association (CAPCOA) has provided guidance on mitigating or reducing GHG emissions from land use development projects. In September 2010, CAPCOA released a guidance document titled *Quantifying Greenhouse Gas Mitigation Measures* which provides GHG reduction values for recommended mitigation measures.⁶⁰ The CAPCOA guidance document was utilized in this analysis for quantifying reductions from physical and operational Project characteristics and Project Design Features in CalEEMod.

In order to provide context for the Project's annual GHG emissions and to provide a quantitative metric for describing the level of GHG reductions incorporated into the Project, the Project's GHG emissions are compared to a BAU scenario, as defined by CARB in the AB 32 *Climate Change Scoping Plan*. CARB's *Climate Change Scoping Plan* and guidance from a wide variety of State agencies has emphasized that achieving the State's GHG emissions reduction goals requires a substantial change from BAU.⁶¹ As discussed in CARB's *Supplemental Functional Equivalent Document (FED)*, CARB updated the projected 2020 BAU emissions inventory based on current economic forecasts (i.e., as influenced by the economic downturn) and reduction measures already in place. CARB staff derived the updated emissions estimates by using more recent baseline emissions data (i.e., substituting 2006–2008 data for 2002–2004 data), considering the influence of the economic recession that lowered industrial output and energy use, and emission reduction measures are already in place (e.g., Pavley I, Title 24, and the 33 percent RPS).

A BAU scenario is used to establish a comparison with Project-generated GHG emissions. The BAU scenario does not consider site-specific conditions, project design features, or prescribed mitigation measures. As an example, a BAU scenario would apply a base Institute of Transportation Engineers ITE trip-generation rate for the project and would not consider site-specific benefits resulting from the proposed mix of uses or close proximity to public transportation. The analysis below establishes BAU as complying with the minimum performance level required under Title 24. But consistent with the *Supplemental FED*, the BAU scenario does consider State mandates that were already in place when CARB prepared the *Supplemental FED* (e.g., Pavley I

⁵⁹ California Air Resources Board, *OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, June 13, 2003*, http://www.arb.ca.gov/msei/2001_residential_lawn_and_garden_changes_in_eqpt_pop_and_act.pdf. Accessed November 2013.

⁶⁰ California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures*, August 2010.

⁶¹ The original Scoping Plan adopted in 2008 defines "business-as-usual" as emissions in the absence of greenhouse gas reduction measures (i.e., the 2020 "business-as-usual" emissions inventory was forecasted based on the 2002 to 2004 Statewide average annual emissions and did not take credit for, inter alia, reduction from 2005 Title 24, Assembly Bill 1493 greenhouse gas emissions reduction standards for vehicles, the California Low Carbon Fuel Standard, or full implementation of the Renewables Portfolio Standard, discussed below).

Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California Low Carbon Fuel Standard).

Emissions calculations for the Project include credits or reductions for the project features set forth in this Draft EIR, such as reductions in energy or water demand. In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of Project generated trips as a result of project features would provide a proportional reduction in mobile source GHG emissions. This scenario conservatively did not include actions and mandates that are not already in place but are expected to be in force in 2020 (e.g., Pavley II), which would further reduce GHG emissions from use of light-duty vehicles.

(2) Greenhouse Gas Reduction Plan

If a project implements design and operational strategies consistent with an applicable GHG reduction policy (i.e., Final Unincorporated Los Angeles County Climate Action Plan 2020), it is considered to have a less than significant impact with respect to its contribution to the cumulative impact of global climate change. These criteria are consistent with Appendix G of the State *CEQA Guidelines* and will be used for determining significance for the Project with respect to GHG reduction plans.

Recognizing the overlap between land use and GHG emissions, in November 2008 the Los Angeles County Board of Supervisors adopted a set of ordinances collectively known as the Los Angeles Green Building Program (also, Green Building Ordinances) which comprises green building development standards, low impact development (LID) standards that address the management of rainfall and stormwater runoff, and drought-tolerant landscaping requirements. The Green Building Program is intended to encourage building practices that conserve water, energy and natural resources; divert waste from landfills; minimize impacts to existing infrastructure; and promote a healthier environment. Accordingly, implementation of this ordinance will reduce energy demand.

As part of the Green Building Program, the County also adopted a Green Building Program Implementation Task Force to review all green building standards and rating systems and make recommendations to the County governing bodies for approval, and developed the Green Building Technical Manual to assist with implementation of two of the three ordinances: Green Building and Drought-Tolerant Landscaping.⁶² The County's Green Building Program went into effect on January 1, 2009.

The green building development standards require all new private development within the unincorporated areas of the County to incorporate green building elements, and requires all new buildings or first-time tenant improvements over 10,000 square feet in size to meet specific LEED® certification or equivalent standards, which vary depending on the nature and size of proposed improvements. Since the Project would involve new construction totaling over 10,000 square feet, it is subject to the County's green building development standards requiring a LEED® certification equivalent.

⁶² *County of Los Angeles Green Building Program, County of Los Angeles Green Building Technical Manual, 2011 Edition, http://planning.lacounty.gov/assets/upl/general/A_DRAFT_TechManUpdate_031011.pdf*

The County LID Standards aim to lessen the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters, and other water bodies, minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly-designed, technically-appropriate Best Management Practices (BMPs) and other strategies, and minimize erosion and other hydrologic impacts on natural drainage systems. BMPs include such methods or practices as using porous pavement, downspout routing, disconnecting impervious surfaces, installation of a dry well, landscaping and irrigation requirements, and a green roof. Currently, all new development and redevelopment under the jurisdiction of the County is required to meet LID requirements, and LID is therefore applicable to the Project.⁶³

The drought-tolerant landscaping ordinance is designed to “help conserve water resources by requiring landscaping that is appropriate to the region’s climate and to the nature of a project’s use.” The ordinance applies to all projects regardless of size and requires that 75 percent of projects’ total landscaped areas contain drought-tolerant plants. The ordinance limits the amount of turf allowed on a project site to 25 percent of the total landscaped area, or 5,000 square feet. All turf within a landscaped area must be water efficient. In addition, landscaped areas must be organized by “hydrozones in accordance with their respective water, cultural (soil, climate, sun and light), and maintenance requirements.”

b. Thresholds of Significance

Until the passage of AB 32, CEQA documents generally did not evaluate GHG emissions or impacts on global climate change. Rather, the primary focus of air pollutant analysis in CEQA documents was the emission of criteria pollutants, or those identified in the California and federal Clean Air Acts as being of most concern to the public and government agencies (e.g., toxic air contaminants). With the passage of AB 32 and SB 97, CEQA documents now contain a more detailed analysis of GHG emissions. However, the analysis of GHGs is different from the analysis of criteria pollutants. Since the half-life of CO₂ is approximately 100 years, GHGs affect the global climate over a relatively long timeframe. Conversely, for criteria pollutants, significance thresholds/impacts are based on daily emissions, and the determination of attainment or non-attainment are based on the daily exceedance of applicable ambient air quality standards (e.g., 1-hour and 8-hour exposures). Also, the scope of criteria pollutant impacts is local and regional, while the scope of GHG impacts is global.

Section 15064.4 of the State *CEQA Guidelines* was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with developing practice, this section urges lead agencies to quantify GHG emissions of projects where possible and includes language necessary to avoid an implication that a “life-cycle” analysis is required. In addition to quantification, this section recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The amendments do not establish a threshold of significance. Lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is

⁶³ Los Angeles County Department of Public Works, *Low Impact Development Standards Manual*, February 2014. <http://dpw.lacounty.gov/idd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf>.

supported by substantial evidence (see Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis.⁶⁴ CEQA Guidelines specify that CEQA project evaluation of GHG emissions can "tier off" a programmatic analysis of GHG emissions, provided that the programmatic analysis (or climate action plan) meets the requirements listed in CEQA Guidelines Section 15183.5.

The potential for GHG emissions impacts is based on thresholds derived from Los Angeles County Department of Regional Planning Initial Study Checklist screening questions, which are based on Appendix G of the State *CEQA Guidelines*. These questions are as follows:

8. Greenhouse Gas Emissions. Would the project:

- Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Each of these is discussed in detail below.

(1) Direct or Indirect Project GHG Emissions

In its January 2008 CEQA and Climate Change white paper, CAPCOA identified a number of potential approaches for determining the significance of GHG emissions in CEQA documents. CAPCOA suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency.

Although GHG emissions can be quantified, CARB, SCAQMD and the County have yet to adopt project-level numerical significance thresholds for GHG emissions that would be applicable to the Project. Assessing the significance of a project's contribution to cumulative global climate change involves: (1) developing pertinent inventories of GHG emissions, and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth in the County of Los Angeles CCAP. As discussed previously, the CCAP meets CEQA Guidelines Section 15183.5, which means that project-specific environmental documents that incorporate applicable CCAP actions may "tier off" the EIR certified for the County General Plan and CCAP to meet project-level CEQA evaluation requirements for GHG emissions. Projects that demonstrate consistency with applicable CCAP actions can be determined to have a less than significant cumulative impact on GHG emissions and climate change (notwithstanding substantial evidence that warrants a more detailed review of project-level GHG emissions). Based on the foregoing, a project that generates GHG emissions, either directly or indirectly, would have a significant impact if the project:

GHG-1 Results in GHG emissions that are not consistent with the County of Los Angeles *Community Climate Action Plan*.

⁶⁴ Cynthia Bryant, Director of the Office of Planning and Research, Letter to Mike Chrisman, Secretary for Natural Resources, April 13, 2009.

(2) Consistency with Greenhouse Gas Reduction Plans

As part of AB 32, the County and State recommend general policies and measures to minimize and reduce GHG emissions from land use development project. Thus, if the project is designed in accordance and not in conflict with these policies and measures, it would result in a less than significant impact since it would be consistent with the County's strategies and local actions on reducing GHG emissions (County of Los Angeles CCAP). Therefore, a significant impact would occur if the project would:

GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

c. Project Characteristics or Design Features

(1) Project Characteristics

The Project would be located in close proximity to existing and future public transit stops, which would result in reduced vehicle trips and VMT, as compared to emissions that would occur for greenfield projects without close access to off-site destinations and public transit stops. As such, the Project would result in a reduction in transportation-related emissions.

CAPCOA has provided guidance on mitigating or reducing emissions from land use development projects. In September 2010, CAPCOA released a guidance document titled *Quantifying Greenhouse Gas Mitigation Measures* which provides emission reduction values for recommended mitigation measures. The CAPCOA guidance document was utilized in this analysis for quantifying reductions from physical and operational Project characteristics and Project Design Features in CalEEMod.

The Project characteristics listed below are consistent with the CAPCOA guidance document, and would reduce vehicle trips to and from the Project Site compared to a similarly project without these characteristics. They would therefore result in a corresponding reduction in VMT and associated GHG emissions.

- **Increased Density:** Increased density—measured in terms of persons, jobs, or dwelling units per unit area—reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies such as enhanced transit services. An increase in job density would result in fewer trips and reduced distance travelled for workers, which would also reduce GHG emissions. The Project would increase the Project Site density to approximately 78 jobs per acre compared to the undeveloped condition of the site. The project would also result in increased job density compared to existing zoning of the site.
- **Location Efficiency:** Location efficiency describes the location of the Project relative to the type of urban landscape such as an urban area, compact infill, or suburban center. In general, compared to the Statewide average, a project could realize VMT reductions up to 65 percent in an urban area, up to 30 percent in a compact infill area, or up to 10 percent in a suburban center from land use/location strategies. The Project Site represents a suburban center within the Rowland Heights community of the unincorporated County of Los Angeles. The Project Site is served by existing public transportation located within one-quarter mile. The Project Site is surrounded by existing off-site

commercial and residential buildings. The location efficiency of the Project Site would result in synergistic benefits that would reduce vehicle trips and VMT compared to the Statewide average and would result in corresponding reductions in transportation-related emissions.

- **Increased Land Use Diversity and Mixed-Uses:** The Project would co-locate complementary commercial and office land uses in close to proximity to existing off-site commercial and residential uses. The Project would include on-site retail and recreational land uses and would be located within one-quarter mile of off-site commercial and residential uses. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and nonautomotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.
- **Increased Transit Accessibility:** The Project would be located within one-quarter mile of public transportation, including existing Foothill Transit bus routes (e.g., 178 and 289). The Project would provide access to on-site uses from existing pedestrian pathways. The increased transit accessibility would reduce vehicle trips and VMT versus the Statewide average, and would encourage walking and nonautomotive forms of transportation, thus resulting in corresponding reductions in transportation-related emissions.
- **Provide Pedestrian Network Improvements:** Providing pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets encourages people to walk instead of drive. The Project would provide an internal pedestrian network that links to the existing off-site pedestrian network that includes sidewalks, and thus would result in a small reduction in VMT and associated transportation-related emissions.

(2) Project Design Features

The Project would achieve several objectives of the County of Los Angeles General Plan Framework Element, SCAG's Regional Transportation Plan, and the SCAQMD Air Quality Management Plan for establishing a regional land use pattern that promotes sustainability. The Project would provide for retail uses which reduces vehicle trips and distance travelled as well as air pollution by locating retail uses near residential uses. Although the project would not be located in a residential neighborhood (walking distance), the project would place retail uses closer to residential uses, resulting in shorter travel distances.

The Project would be designed to meet the standards for LEED® Silver Certification by the United States Green Building Council (USGBC) through the incorporation of green building techniques and other sustainability features. Key Project Design Features that would contribute to energy efficiencies include the use of glass/window areas for ventilation and daylight accessibility, and landscaping of roof decks. Other building features would include stormwater retention; installation of heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; use of materials and finishes that emit low quantities of VOCs; use of high-efficiency fixtures and appliances, water conservation features; and recycling of solid wastes. The Project would also be designed to comply with the County of Los Angeles Green Building Standards and LID requirements. The following Project Design Features would reduce air pollutant emissions:

- **PDF-AQ-1:** The Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and achieve the equivalent of USGBC LEED® Silver Certification. These measures would also include consistency with Los Angeles County Green Building Standards and Low Impact

Development requirements. The Project would incorporate measures and performance standards which include but are not limited to the following:

- The Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous construction debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area.
- The Project would be designed to optimize energy performance and reduce building energy cost by 10 percent for new construction compared to ASHRAE 90.1-2010, Appendix G, and the Title 24 Building Standards Code.
- The Project would reduce indoor water use by a minimum of 35 percent by installing water fixtures that exceed applicable standards.

d. Project Impacts

(1) Greenhouse Gas Emissions

Threshold GHG-1: A significant impact would occur if the Project would result in GHG emissions that are not consistent with the Los Angeles County *Community Climate Action Plan*.

Impact Statement GHG-1: *Impacts regarding the annual increase in GHG emissions would be less than significant. The Project would generate GHG emissions due to construction and operational activities; however, the net increase in annual GHG emissions, directly and indirectly, would be consistent with the Los Angeles County Community Climate Action Plan.*

(a) Project Consistency with CCAP

The Project's significance with respect to GHG emissions is evaluated based on its consistency with applicable GHG reduction strategies in the County of Los Angeles CCAP. **Table 4.F-3, *Consistency with Applicable Community Climate Action Plan Greenhouse Gas Reduction Strategies***, contains a list of GHG-reducing strategies applicable to the Project. The Project-level analysis describes the consistency of the Project with these GHG emissions reduction strategies. As discussed in Table 4.F-5, the Project is consistent with the applicable strategies in the County of Los Angeles CCAP. Therefore, in accordance with CEQA Guidelines Section 15183.5, which specifies that CEQA project evaluation of GHG emissions can "tier off" a programmatic analysis of GHG emissions such as the Los Angeles County *Community Climate Action Plan*, the Project would result in less than significant GHG emissions.

Table 4.F-3

Consistency with Applicable Community Climate Action Plan Greenhouse Gas Reduction Strategies

Strategy	Category / Description	Consistency Analysis
Green Building and Energy		
BE-1: Green Building Development	Promote and incentivize at least Tier 1 voluntary standards within CALGreen for all new residential and nonresidential buildings. Develop a heat island reduction plan and facilitate green building development by removing regulatory and procedural barriers.	<p>Consistent. According to the <i>Community Climate Action Plan</i>, adoption of the CALGreen Tier 1 standards is voluntary, but would result in approximately 10 percent less energy use than the 2013 Title 24 standard for commercial development. The Project would achieve this level of energy savings as required in PDF-AQ-1, which states that the Project would be designed to optimize energy performance and reduce building energy cost by 10 percent for new construction compared to ASHRAE 90.1-2010, Appendix G, and the Title 24 Building Standards Code.</p> <p>The Project shall install cool roofs for heat island reduction. Cool roofs shall meet the CALGreen Tier 1 Solar Reflectance Index (SRI). Non-roof hardscape area shall use light colored material and/or an open-grid pavement system or pervious/permeable pavement system as per CALGreen Tier 1 requirements. In addition, the Project would provide a minimum of one 15-gallon tree for every 10,000 square feet of developed area. At least 65 percent of the trees shall be from the County’s Drought Tolerant Plant List.</p> <p>The Project is consistent with the GHG reductions under this strategy.</p>
BE-2: Energy Efficiency Programs	Energy efficiency retrofits for at least 25 percent of existing commercial buildings over 50,000 square feet and at least 5 percent of existing single family residential buildings.	<p>Not Applicable. The proposed Project is not an existing building; therefore, this strategy does not apply to the Project. The Project would not conflict with or impede the County’s ability to implement this strategy for existing buildings.</p>
BE-3: Solar Installations	Promote and incentivize solar installations for new and existing homes, commercial buildings, carports and parking areas, water heaters, and warehouses. (Emissions reductions assume implementation of solar photovoltaics; however, project applicants can install other solar technologies, such as solar thermal, as feasible, which may increase GHG reductions, relative to standard photovoltaics systems.)	<p>Consistent. The Project would orient new buildings to optimize passive solar and daylighting to reduce building energy demand from HVAC equipment as well as lighting. Project buildings shall be constructed with solar-ready rooftops that provide for the installation of on-site solar photovoltaic (PV) or solar water heating (SWH) systems. The building design documents shall show an allocated Solar Zone and the pathway for interconnecting the PV or SWH system with the building electrical or plumbing system. The Solar Zone is a section of the roof that has been specifically designated and reserved for the installation of a solar PV system, SWH system, and/or other solar generating system. The Solar Zone must be kept free from roof penetrations and have minimal shading.</p>

Table 4.F-3 (Continued)

Consistency with Applicable Community Climate Action Plan Greenhouse Gas Reduction Strategies

Strategy	Category / Description	Consistency Analysis
BE-4: Alternative Renewable Energy Programs	<p>Implement pilot projects for currently feasible wind, geothermal, and other forms of alternative renewable energy. (Potential future forms of non-GHG energy could include nuclear fusion, which is being researched by many parties, including the Lockheed Martin Skunk Works in Palmdale, but which has not yet been experimentally proven as a viable commercial energy source. As new technologies become proven, the County will consider how they can support further development and deployment of such technologies.)</p> <p>Note: GHG emissions reductions from this strategy have not been quantified or counted toward attainment of the County’s CCAP target.</p>	<p>Not Applicable. The proposed Project is not a utility project; therefore, this strategy does not apply to the Project. The Project would not conflict with or impede the County’s ability to implement this strategy for utility pilot projects.</p>
BE-5: Wastewater Treatment Biogas	<p>Encourage renewable biogas projects.</p> <p>Note: GHG emissions reductions from this strategy have not been quantified or counted toward attainment of the County’s CCAP target.</p>	<p>Not Applicable. The proposed Project is not a biogas project; therefore, this strategy does not apply to the Project. The Project would not conflict with or impede the County’s ability to implement this strategy for biogas projects.</p>
BE-6: Energy Efficiency Retrofits of Wastewater Equipment	<p>Encourage the upgrade and replacement of wastewater treatment and pumping equipment.</p> <p>Note: GHG emissions reductions from this strategy have not been quantified or counted toward attainment of the County’s CCAP target.</p>	<p>Not Applicable. The proposed Project is not a wastewater treatment or pumping project; therefore, this strategy does not apply to the Project. The Project would not conflict with or impede the County’s ability to implement this strategy for wastewater treatment and pumping projects.</p>
BE-7: Landfill Biogas	<p>Partner with the owners and operators of landfills with at least 250,000 tons of waste-in-place to identify incentives to capture and clean landfill gas to beneficially use the biogas to generate electricity, produce biofuels, or otherwise offset natural gas or other fossil fuels.</p> <p>Note: GHG emissions reductions from this strategy have not been quantified or counted toward attainment of the County’s CCAP target.</p>	<p>Not Applicable. The proposed Project is not a landfill project; therefore, this strategy does not apply to the Project. The Project would not conflict with or impede the County’s ability to implement this strategy for landfill projects.</p>

Table 4.F-3 (Continued)

Consistency with Applicable Community Climate Action Plan Greenhouse Gas Reduction Strategies

Strategy	Category / Description	Consistency Analysis
Land Use and Transportation		
LUT-1: Bicycle Programs and Supporting Facilities	Construct and improve bicycle infrastructure to increase biking and bicyclist access to transit and transit stations/hubs. Increase bicycle parking and “end-of-trip” facilities.	<p>Consistent. The Project would promote and support local, regional, and State mobility objectives to reduce vehicle miles traveled and infrastructure costs, by siting new commercial infill development in proximity to existing local bus lines and a commuter rail station and providing facilities to support and encourage the use of bicycles. Bicycle infrastructure including bicycle parking and “end-of-trip” facilities would comply with the applicable portions of the County’s Healthy Design Ordinance (HDO) (Los Angeles County Code, Title 22, Section 22.52.1225). The HDO requires the following number of bicycle parking spaces for commercial buildings:</p> <ul style="list-style-type: none"> ▪ Short-term (two hours or less): <ul style="list-style-type: none"> ○ General Retail/Restaurants: One space per each 5,000 square feet of gross floor area (two space minimum); ○ Hotel/Motel: One space per each 40 hotel/motel guest rooms (two space minimum); ○ Office: One space per each 20,000 square feet of gross floor area (two space minimum); ○ Theaters, Auditoriums, Lodge Rooms, Stadiums, or similar entertainment uses: One space per each 50 intended visitors based on occupancy load (two space minimum). ▪ Long-term (two hours or longer): <ul style="list-style-type: none"> ○ General Retail/Restaurants: One space per each 12,000 square feet of gross floor area (two space minimum); ○ Hotel/Motel: One space per each 20 hotel/motel guest rooms (two space minimum); ○ Office: One space per each 10,000 square feet of gross floor area (two space minimum); ○ Theaters, Auditoriums, Lodge Rooms, Stadiums, or similar entertainment uses: One space per each 100 intended visitors based on occupancy load (two space minimum). <p>In addition, the HDO requires that all new commercial and industrial buildings with 75,000</p>

Table 4.F-3 (Continued)

Consistency with Applicable Community Climate Action Plan Greenhouse Gas Reduction Strategies

Strategy	Category / Description	Consistency Analysis
LUT-2: Pedestrian Network	Construct and improve pedestrian infrastructure to increase walking and pedestrian access to transit and transit stations/hubs. Program the construction of pedestrian projects toward the goal of completing 15,000 linear feet of new pedestrian improvements/amenities per year.	<p>or more square feet of gross floor area install showers and changing facilities that shall at a minimum be accessible to employees.</p> <p>Consistent. The Project would create an activity node for the Project area and encourage a consistently high level of pedestrian activity during the day and the evening, by co-locating a sufficiently diverse concentration of hotels and commercial uses with different peak activity periods. The Project would enhance the pedestrian experience along Gale Avenue, and provide street-level pedestrian connectivity to the Project Site through the provision of landscaped setbacks on the Project’s street frontage, landscaped pedestrian walkways through the Project Site, and a dedicated pedestrian connection separate from vehicle driveways. The Project would provide on-site common open space amenities in response to community input related to visual enhancement of the parking field and for the use of Project patrons and employees.</p>
LUT-3: Transit Expansion	Collaborate with the Los Angeles County Metropolitan Transportation Authority (Metro) on a transit program that prioritizes transit by creating bus priority lanes, improving transit facilities, reducing transit-passenger time, and providing bicycle parking near transit stations. Construct and improve bicycle, pedestrian and transit infrastructure to increase bicyclist and pedestrian access to transit and transit stations/hubs.	<p>Consistent. While the proposed Project is not specifically a transit expansion project, the Project would site new commercial infill development in proximity to existing local bus lines and a commuter rail station and would provide facilities to support and encourage the use of bicycles. Therefore, the Project would be consistent with encouraging transit use by providing commercial destinations near transit facilities and on-site bicycle parking facilities. Furthermore, the Project would not conflict with or impede the County’s ability to implement this strategy for transit expansion projects.</p>
LUT-4: Travel Demand Management	Encourage ride- and bike-sharing programs and employer-sponsored vanpools and shuttles. Encourage market-based bike sharing programs that support bicycle use around and between transit stations/hubs. Implement marketing strategies to publicize these programs and reduce commute trips.	<p>Consistent. The Project would site new commercial infill development in proximity to existing local bus lines and a commuter rail station and would provide facilities to support and encourage the use of bicycles. The Project would also provide parking spaces designed for carpool or alternative fueled vehicles which will encourage Project tenants to implement employee ride-sharing programs.</p>
LUT-5: Car-Sharing Program	Implement a car-sharing program to allow people to have on-demand access to a shared fleet of vehicles.	<p>Consistent. The Project would provide parking spaces designed for carpool or alternative fueled vehicles which will encourage Project tenants to implement employee ride-sharing programs. The Project would allow for private car-sharing</p>

Table 4.F-3 (Continued)

Consistency with Applicable Community Climate Action Plan Greenhouse Gas Reduction Strategies

Strategy	Category / Description	Consistency Analysis
LUT-6: Land Use Design and Density	Promote sustainability in land use design, including diversity of urban and suburban developments.	<p>companies to locate on the Project site as a tenant to provide on-demand access to a shared fleet of vehicles.</p> <p>Consistent. The Project would locate new commercial development in close proximity to existing commercial and light industrial uses to avoid displacing residential uses or introducing incompatible land uses, but in close proximity to the existing residential population south of the Project Site and SR-60, and the existing daytime employee population to the north, east, and west. The Project would address the existing shortage of commercial retail options in the Project area (i.e., the southeastern San Gabriel Valley), and expand the variety of such options to serve Rowland Heights community residents by developing high-quality commercial center with a diversity of tenant spaces (retail, restaurant, and office space on two floors) that would provide a range of goods and services to the community. The Project would also provide a high-quality extended-stay hotel in the currently underserved eastern San Gabriel Valley market where no comparable hotel product exists and demand for longer-term stays for family vacationers and business travelers is increasing.</p> <p>The Project would promote and support local, regional, and State mobility objectives to reduce vehicle miles traveled and infrastructure costs, by siting new commercial infill development in proximity to existing local bus lines and a commuter rail station and providing facilities to support and encourage the use of bicycles.</p> <p>The Project would also maximize efficient use of the Project Site through the use of shared parking that accommodates peak demand for on-site uses.</p>
LUT-7: Transportation Signal Synchronization Program	Improve the network of traffic signals on the major streets throughout LA County.	<p>Consistent. The Project’s traffic impact analysis, <i>Rowland Heights Plaza Traffic Impact Analysis</i> (2015), includes an impact assessment of Project traffic as well as a signal warrant analysis. Details of the analysis are provided in Section 4.K, Transportation and Parking, and in Appendix I of this Draft EIR. Required improvements to the network of traffic signals in the Project area would be made in accordance with the findings and recommendations of the traffic impact analysis.</p>

Table 4.F-3 (Continued)

Consistency with Applicable Community Climate Action Plan Greenhouse Gas Reduction Strategies

Strategy	Category / Description	Consistency Analysis
LUT-8: Electric Vehicle Infrastructure	Install 500 electric vehicle (EV) charging facilities at County-owned public venues (e.g., hospitals, beaches, stand-alone parking facilities, cultural institutions, and other facilities) and ensure that at least one-third of these charging stations will be available for visitor use.	Consistent. The Project is not a County-owned public venue; therefore, this strategy does not apply to the Project. However, the Project would install EV charging facilities and a minimum of one-third shall be made available to Project site visitors. Thus, the Project would be consistent with this strategy. The Project would also not conflict with or impede the County's ability to implement this strategy for County-owned public venues.
LUT-9: Idling Reduction Goal	Encourage idling limits of 3 minutes for heavy-duty construction equipment, as feasible within manufacturer's specifications.	Consistent. Section 2485 in Title 13 of the California Code of Regulations limits the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction to five minutes at any location. The Project shall comply with this regulatory requirement and would encourage construction contractors to further limit idling to 3 minutes or less when practicable and feasible. Construction contractors shall be required to submit a construction vehicle management plan that includes the following information: idling time goals; requiring hour meters on equipment; and documenting the serial number, horsepower, age, and fuel of all onsite equipment.
LUT-10: Efficient Goods Movement	Support regional efforts to maximize the efficiency of the goods movement system throughout the unincorporated areas. Note: GHG emissions reductions from this strategy have not been quantified or counted toward attainment of the County's CCAP target.	Not Applicable. The Project is not a goods movement project; therefore, this strategy does not apply to the Project. This emission reduction strategy would primarily be implemented by Los Angeles County's Department of Public Works (DPW) by supporting efforts to evaluate zero and/or near-zero emission freight corridors and working with appropriate agencies and partners to identify and replace at-grade railroad crossings to reduce freight delay and vehicle idling (CCAP, p. C-13). The Project would not conflict with or impede the County's ability to implement this strategy to maximize the efficiency of the goods movement system.
LUT-11: Sustainable Pavements Program	Reduce energy consumption and waste generation associated with pavement maintenance and rehabilitation. Note: GHG emissions reductions from this strategy have not been quantified or counted toward attainment of the County's CCAP target.	Consistent. The Project would re-pave/maintain roadways directly adjacent to Project construction site areas that are degraded by construction activity and heavy-duty equipment usage. Recycled/reused materials shall be used to the extent available and feasible. Non-roof hardscape area shall use light colored material and/or an open-grid pavement system or

Table 4.F-3 (Continued)

Consistency with Applicable Community Climate Action Plan Greenhouse Gas Reduction Strategies

Strategy	Category / Description	Consistency Analysis
LUT-12: Electrify Construction and Landscaping Equipment	Utilize electric equipment wherever feasible for construction projects. Reduce the use of gas-powered landscaping equipment. Note: GHG emissions reductions from this strategy have not been quantified or counted toward attainment of the County’s CCAP target.	pervious/permeable pavement system as per CALGreen Tier 1 requirements (Section A5.106.11.1). Consistent. The Project would utilize electric equipment for construction equipment where feasible. Candidate equipment includes electric cranes, which have been demonstrated as feasible and have been used in other construction projects in the region. The Project shall also prioritize the use of landscaping contractor(s) with electric-powered equipment where available and feasible.
Water Conservation and Wastewater		
WAW-1: Per Capita Water Use Reduction Goal	Meet the State established per capita water use reduction goal as identified by Senate Bill (SB) X7-7 for 2020. (The State goal is a 20 percent reduction in per capita water use compared to baseline levels.)	Consistent. As stated in PDF-AQ-1, the Project would reduce indoor water use by a minimum of 35 percent by installing water fixtures that exceed applicable standards. The Project would provide a minimum of one 15-gallon tree for every 10,000 square feet of developed area. At least 65 percent of the trees shall be from the County’s Drought Tolerant Plant List, which would minimize outdoor water usage.
WAW-2: Recycled Water Use, Water Supply Improvement Programs, and Stormwater Runoff	Promote the use of wastewater and gray water to be used for agricultural, industrial, and irrigation purposes consistent with the appropriate provisions of Title 22 and approval of the California Department of Health Services. Manage stormwater, reduce potential treatment, and protect local groundwater supplies. Note: GHG emissions reductions of larger efforts to promote the use of wastewater and gray water have not been quantified or counted toward attainment of the County’s CCAP target.	Consistent. The Project site and its environs are located within the wastewater treatment service area of the San Jose Creek Water Reclamation Plant (WRP). The San Jose Creek WRP provides primary, secondary, and tertiary treatment that yields at least 35 mgd of purified (recycled) water, some of which is available for use within the local area. The County’s Low Impact Development (LID) Ordinance also requires stormwater management strategies. The Project would implement stormwater best management practices consistent with the County’s requirements.
Waste Reduction, Reuse, and Recycling		
SW-1: Waste Diversion Goal	For the County’s unincorporated areas, adopt a waste diversion goal to comply with all state mandates to divert at least 75 percent of waste from landfill disposal by 2020.	Consistent. The Project would exceed this requirement as part of its compliance with the County’s requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process and recycle or reuse 75 percent of nonhazardous construction and demolition debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area. The Project would provide areas for the collection of recyclable materials on the Project Site. Project

Table 4.F-3 (Continued)

Consistency with Applicable Community Climate Action Plan Greenhouse Gas Reduction Strategies

Strategy	Category / Description	Consistency Analysis
		generate solid waste would be collected by private waste services providers that would process mixed waste that yields diversion results comparable to source separation and would achieve the County’s goal of 75 percent waste diversion by 2020.
Land Conservation and Tree Planting		
LC-1: Develop Urban Forests	Support and expand urban forest programs within the unincorporated areas.	Consistent. The Project would provide a minimum of one 15-gallon tree for every 10,000 square feet of developed area. At least 65 percent of the trees shall be from the County’s Drought Tolerant Plant List, which would minimize outdoor water usage.
LC-2: Create New Vegetated Open Space	Restore and revegetate previously disturbed land and/or unused urban and suburban areas.	Consistent. The Project would provide a minimum of one 15-gallon tree for every 10,000 square feet of developed area. At least 65 percent of the trees shall be from the County’s Drought Tolerant Plant List, which would minimize outdoor water usage.
LC-3: Promote the Sale of Locally Grown Foods and/or Products	Establish local farmers markets and support locally grown food. Note: GHG emissions reductions from this strategy have not been quantified or counted toward attainment of the County’s CCAP target.	Consistent. Although there is no commitment to host a farmers market on the Project Site, the potential to do so, with procurement of the appropriate County approvals, the Project would not preclude this opportunity.
LC-4: Protect Conservation Areas	Encourage the protection of existing land conservation areas. Note: GHG emissions reductions from this strategy have not been quantified or counted toward attainment of the County’s CCAP target.	Not Applicable. The Project site is not an existing land conservation area; therefore, this strategy does not apply to the Project. The Project would not conflict with or impede the County’s ability to implement this strategy for existing land conservation areas.

Source: PCR Services Corporation, 2015.

(b) Construction-related Emissions

In order to provide additional information to decision makers and the public, the emissions of GHGs associated with construction of the Project were calculated for each year of construction activity. Detailed emissions calculations are provided in Appendix E of this Draft EIR. Results of the GHG emissions calculations are presented on **Table 4.F-4, Unmitigated Construction Greenhouse Gas Emissions**. Although GHGs are generated during construction and are accordingly considered one-time emissions, it is important to consider them when assessing all of the long-term GHG emissions associated with a project. The draft SCAQMD indicators of significance recommend that construction-related GHG emissions be amortized over a project’s 30-year lifetime in order to include these emissions as part of a project’s annualized lifetime total emissions, so that GHG reduction measures will address construction GHG emissions as part of the

Table 4.F-4

Unmitigated Construction Greenhouse Gas Emissions

Emission Source	CO ₂ e (Metric Tons) ^a
Construction Phase 1 - 2017	227
Construction Phase 1 - 2018	858
Construction Phase 1 - 2019	441
Construction Phase 2 - 2019	246
Construction Phase 2 - 2020	428
Total	2,199
Annual (Amortized over 30 years)	73

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E.

Source: PCR Services Corporation, 2015

operational GHG reduction strategies. In accordance with this methodology, the estimated Project's construction GHG emissions have been amortized over a 30-year period and are included in the annualized operational GHG emissions.

(c) Operational-related Emissions

In order to provide additional information to decision makers and the public, the emissions of GHGs associated with operation of the Project were calculated. The Project must comply with the portions of County's Green Building Standards and LID Code applicable to nonresidential development. The Project would incorporate Project Design Features in a manner to achieve the equivalent of USGBC LEED® Silver Certification. Additionally, physical and operational Project characteristics for which sufficient data are available to quantify the reductions from building energy and resource consumption have been included in the quantitative analysis, and include but are not limited to the following measures: installation of energy efficient appliances, low-water fixtures, water efficient irrigation, and reduced building energy usage by 10 percent compared to the Title 24 Building Standards Code. As discussed under Project Characteristics, the Project is expected to result in reduced VMT associated with the Project's co-location of different retail uses on the Project Site and its proximity to public transit options. The estimated VMT reductions are calculated using the equations and methodologies prescribed in the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation characteristics and measures. Based on the Project's characteristics (discussed previously) and the VMT reduction calculation formulas provided in the CAPCOA guidance, the Project would reduce VMT by approximately 7.8 percent compared to a BAU project without these characteristics. These characteristics would result in a corresponding reduction in transportation-related GHG emissions and were included in the quantitative analysis.

The first phase of the Project is expected to be operational in 2018, with full build-out by 2020 or, potentially, later, depending on market conditions. Maximum annual net GHG emissions resulting from motor vehicle, energy (i.e., electricity, natural gas), water conveyance, and waste sources were calculated for the expected opening year.

The Project is expected to result in reduced VMT associated with the Project's proximity to public transit and complementary uses. The estimated VMT reductions are calculated using the equations and methodologies prescribed in the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation characteristics and measures. Detailed VMT reduction calculations for the Project are provided in Appendix E of this Draft EIR.

The maximum annual net GHG emissions resulting from motor vehicle, energy (i.e., electricity, natural gas), water conveyance, and waste sources were calculated for year 2020, and are shown in **Table 4.F-5, Annual Greenhouse Gas Emissions**. The annualized GHG emissions from construction and operation of a representative BAU scenario are also shown in Table 4.F-5. The BAU scenario emissions estimates include energy and water consumption in accordance with the minimum regulatory requirements during the 2006, 2007, and 2008 time period, including the Low Carbon Fuel Standard, AB 1493 vehicle emissions standards, and the energy requirements of the Title 24 Building Standards Code. The BAU project does not account for energy efficiency measures that would exceed the Title 24 Building Standards Code and does not account for trip reductions from co-location of uses and availability of public transportation within one-quarter mile. As shown, the Project would reduce its emissions by approximately 17 percent as compared to the BAU scenario.

Table 4.F-5

Annual Greenhouse Gas Emissions

<u>Emissions Sources</u>	<u>CO₂e (Metric Tons per Year) ^a</u>
Business-As-Usual Scenario (Year 2020)	
Construction (Amortized)	73
On Road Mobile Sources	9,453
Area	<1
Electricity	2,064
Natural Gas	942
Water/Wastewater Conveyance	173
Waste	277
Subtotal	12,981
Project Scenario (Year 2020)	
Construction (Amortized)	73
On Road Mobile Sources	7,843
Area	<1
Electricity	1,699
Natural Gas	779
Water/Wastewater Conveyance	119
Waste	277
Subtotal	10,790
Project Percent Reduction Compared to BAU	16.9%

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C of this Draft EIR.

Source: PCR Services Corporation, 2015

(2) Greenhouse Gas Reduction Plans

Threshold GHG-2: A significant impact would occur if the Project would conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Impact Statement GHG-2: *Construction and operation of the Project would not conflict with applicable GHG emissions reductions plans, policies, or regulations. As a result, construction and operation of the Project would not have a significance impact with respect to consistency with GHG reduction plans, and impacts would be less than significant.*

Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the Project's GHG emissions would actually cause a measurable increase in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, current energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago; however, the net effect is difficult to quantify. Thus, the estimated net increase in emissions resulting from implementation of the Project presented above may be an over- or underestimation. The GHG emissions of the Project alone would not likely cause a *direct physical change in the environment*.

According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."⁶⁵ It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone. However, given 1) the lack of evidence indicating that those emissions would cause a measurable increase in global GHG emissions necessary to exacerbate global climate change and 2) the fact that the Project incorporates physical and operational Project characteristics and Project Design Features that would reduce potential GHG emissions to a less-than-significant level, the Project is considered not to conflict with the GHG reduction goals of AB 32.

As discussed previously, the Project incorporates a Project Design Feature (PDF-AQ-1) that would reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, and use of energy-efficient appliances and equipment. The Project would also incorporate characteristics that would reduce transportation-related GHG emissions by locating Project-related jobs and retail, restaurant, and recreational uses near complementary commercial uses and within one-quarter mile of transit, thereby encouraging alternative forms of transportation and pedestrian activity.

As discussed previously, the Project would be constructed and operated in a manner consistent with a Silver Certification from the USGBC's LEED® program. The LEED® features that would be incorporated in the Project would include transportation measures to reduce vehicle trips, building efficiency measures to reduce energy consumption, and water-saving measures. The Project would be designed to optimize energy performance and reduce building energy cost by 10 percent. Trees planted on the Project Site as part of the planned landscaping would sequester CO₂ as they age (not included in the quantitative analysis). The average tree can sequester approximately 330 pounds of carbon dioxide from the atmosphere every year. The Project would reduce indoor water use by a minimum of 35 percent with water fixtures that exceed

⁶⁵ California Air Pollution Control Officer's Association, *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008*.

applicable standards. Since the Project would implement Project Design Features intended to achieve the equivalent of LEED® Silver Certification, the Project would result in GHG emissions consistent with draft SCAQMD Tier 4 reduction targets, as shown previously in Table 4.F-4.

In accordance with the County’s Green Building Program and CALGreen, the Project would incorporate the following features supportive of goals to reduce GHG emissions:

- **Energy Conservation:** Buildings must reduce energy demand at least 15 percent below Title 24 (2008 State of California Energy Efficiency Standards).
- **Outdoor Water Conservation:** A smart irrigation controller must be installed for any landscaped area of the Project. Sixty-five percent of the total landscaped areas shall use drought-tolerant plant species selected from the County’s Drought-Tolerant Plant List.
- **Resource Conservation:** At least 65 percent of construction waste (by weight) must be recycled, reused, or diverted.
- **Tree Planting:** A minimum of one 15-gallon tree must be planted and maintained for every 10,000 square feet of developed area. At least 65 percent of the trees must be listed on the County’s Drought Tolerant Plant List.
- **High-Efficiency Toilets:** New toilets must be rated high efficiency.

Consistency with GHG reduction strategies is an important priority, and reasonable reduction efforts should be taken. As discussed previously in Table 4.F-5, the Project is consistent with the applicable GHG reductions strategies and local actions in the County of Los Angeles CCAP. Additionally, the Project is consistent with GHG reduction measures from other applicable plans. **Table 4.F-6, Consistency with Applicable Greenhouse Gas Reduction Strategies**, contains a list of GHG-reducing strategies potentially applicable to the Project. The Project-level analysis describes the consistency of the Project with these strategies.

Table 4.F-6

Consistency with Applicable Greenhouse Gas Reduction Strategies

Source	Category / Description	Consistency Analysis
AB 1493 (Pavley Regulations)	Reduces greenhouse gas emissions in new passenger vehicles from 2012 through 2016. Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020.	Consistent. The Project would be consistent with this regulation and would not conflict with implementation of the vehicle emissions standards.
SB 1368	Establishes an emissions performance standard for power plants within the State of California.	Consistent. The Project would be consistent with this regulation and would not conflict with implementation of the emissions standards for power plants.
Low Carbon Fuel Standard	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	Consistent. The Project would be consistent with this regulation and would not conflict with implementation of the transportation fuel standards.

Table 4.F-6 (Continued)

Consistency with Applicable Greenhouse Gas Reduction Strategies

Source	Category / Description	Consistency Analysis
California Green Building Standards Code Requirements	All bathroom exhaust fans shall be ENERGY STAR compliant.	Consistent. The Project would utilize energy efficiency appliances and equipment and would exceed the energy standards in ASHRAE 90.1-2007, Appendix G and the Title 24 Building Standards Code.
	HVAC Systems will be designed to meet ASHRAE standards.	Consistent. The Project would utilize energy-efficient appliances and equipment and would exceed the energy standards in ASHRAE 90.1-2007, Appendix G and the Title 24 Building Standards Code.
	Energy commissioning shall be performed for buildings larger than 10,000 square feet.	Consistent. The Project would be commissioned as part of its USGBC LEED® Silver Certification process.
	Air filtration systems are required to meet a minimum of MERV 8 or higher.	Consistent. The Project would meet or exceed this requirement as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process.
	Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	Consistent. The Project would meet this requirement as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process.
	Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces will be designed for such vehicles.	Consistent. The Project would meet this requirement as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process.
	Long-term and short-term bike parking shall be provided for up to five percent of vehicle trips.	Consistent. The Project would exceed this requirement as part of the incorporated physical and operational Project characteristics to reduce vehicle trips and VMT and encourage alternative modes of transportation for patrons and employees.
	Stormwater Pollution Prevention Plan (SWPPP) required.	Consistent. The Project would meet this requirement.
	Indoor water usage must be reduced by 20 percent compared to current California Building Code Standards for maximum flow.	Consistent. The Project would exceed this requirement as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process and reduce indoor water usage by a minimum of 35 percent.
	All irrigation controllers must be installed with weather sensing or soil moisture sensors.	Consistent. The Project would meet this requirement as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process.

Table 4.F-6 (Continued)

Consistency with Applicable Greenhouse Gas Reduction Strategies

Source	Category / Description	Consistency Analysis
	Wastewater usage shall be reduced by 20 percent compared to current California Building Standards.	Consistent. The Project would exceed this requirement as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process and reduce indoor water usage by a minimum of 35 percent.
	Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	Consistent. The Project would exceed this requirement as part of its USGBC LEED® Silver Certification process and recycle or reuse 75 percent of nonhazardous construction and demolition debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area.
	Requires documentation of types of waste recycled, diverted or reused.	Consistent. The Project would meet this requirement as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process.
	Requires use of low VOC coatings consistent with AQMD Rule 1168.	Consistent. The Project would be consistent with this regulation and would meet or exceed the low VOC coating requirements.
	100 percent of vegetation, rocks, soils from land clearing shall be recycled or stockpiled on-site.	Consistent. The Project would exceed this requirement as part of its compliance with the City's requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process. The Project would recycle or reuse 75 percent of total nonhazardous construction and demolition debris (including 100 percent of nonhazardous vegetation, rocks, and soils) or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area.
Climate Action Team	Reduce diesel-fueled commercial motor vehicle idling.	Consistent. The Project would be consistent with the CARB Air Toxics Control Measure (ATCM) to limit heavy duty diesel motor vehicle idling to no more than five minutes at any given time (see Subsection 4.B.2.b(2)(c), in Section 4.B, Air Quality, of this Draft EIR).

Table 4.F-6 (Continued)

Consistency with Applicable Greenhouse Gas Reduction Strategies

Source	Category / Description	Consistency Analysis
	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.	Consistent. The Project would exceed this requirement as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process and recycle or reuse 75 percent of nonhazardous construction and demolition debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area. The Project would provide areas for the collection of recyclable materials on the Project Site.
	Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	Consistent. The Project would provide appropriate landscaping on the Project Site, including vegetation and trees capable of sequestering carbon.
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	Consistent. The Project would, as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process, reduce indoor water usage by a minimum of 35 percent.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	Consistent. The Project would utilize energy-efficient appliances and equipment and would exceed the energy standards in ASHRAE 90.1-2007, Appendix G and the Title 24 Building Standards Code.
	Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/ commercial development along transit corridors, and implementing intelligent transportation systems.	Consistent. The Project would incorporate physical and operational Project characteristics that would reduce vehicle trips and VMT and encourage alternative modes of transportation for patrons and employees.
	Reduce energy use in private buildings.	Consistent. The Project would utilize energy efficiency appliances and equipment and would exceed the energy standards in ASHRAE 90.1-2007, Appendix G and the Title 24 Building Standards Code.
Los Angeles County Green Building Ordinance	Install a smart irrigation controller and require 65 percent of the landscaped area to use drought-tolerant plant species.	Consistent. The Project would meet this requirement as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver certification.

Table 4.F-6 (Continued)

Consistency with Applicable Greenhouse Gas Reduction Strategies

Source	Category / Description	Consistency Analysis
	Achieve 65 percent waste diversion for construction waste.	Consistent. The Project would exceed this requirement as part of its compliance with the County’s requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process and recycle or reuse 75 percent of nonhazardous construction and demolition debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area. The Project would provide areas for the collection of recyclable materials on the Project Site.
	Minimum of one 15-gallon tree must be planned for every 10,000 feet of developed area.	Consistent. The Project would meet this requirement as part of its compliance with the County’s requirements.
	Install high efficiency toilets	Consistent. The Project would exceed this requirement as part of its compliance with the County’s requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process and reduce indoor water usage by a minimum of 35 percent.
Los Angeles County Low Impact Development (LID) Standards	All Designated Projects (required) must retain 100 percent of Stormwater Design Volume on-site through infiltration, evapotranspiration, stormwater runoff harvest, or a combination thereof.	Consistent. The Project would implement stormwater BMPs consistent with the County’s requirements.

Source: PCR Services Corporation, 2015.

Since the Project would implement Project Design Features intended to achieve the equivalent of LEED® Silver Certification and would incorporate water conservation, energy conservation, tree planting, and other features consistent with the County’s Green Building Standards Code, the Project would not conflict with any applicable plan, policy, or regulation to reduce GHG emissions and impacts would be less than significant.

(a) Consistency with Executive Orders S-3-05 and B-30-15

At the State level, Executive Orders S-3-05 and B-30-15 are orders from the State’s Executive Branch for the purpose of reducing statewide GHG emissions. Executive Orders S-3-05’s goal to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). As analyzed above, the Project is consistent with AB 32. Therefore, the Project does not conflict with this component of the Executive Orders.

The Executive Orders also establish the goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. These goals have not yet been codified. However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation

and energy sectors, including electrification and the decarbonization of fuel, will be required. In its *Climate Change Scoping Plan*, CARB acknowledged that the “measures needed to meet the 2050 are too far in the future to define in detail.”⁶⁶ In the First Update, however, CARB generally described the type of activities required to achieve the 2050 target: “energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately.”⁶⁷ Due to the technological shifts required and the unknown parameters of the regulatory framework in 2030 and 2050, quantitatively analyzing the Project’s impacts further relative to the 2030 and 2050 goals currently is speculative for purposes of CEQA. Moreover, CARB has not calculated and released the BAU emissions projections for 2030 or 2050, which are necessary data points for quantitatively analyzing a CEQA project’s consistency with these targets.

Although the Project’s emissions levels in 2030 and 2050 cannot yet be reliably quantified, Statewide efforts are underway to facilitate the State’s achievement of those goals and it is reasonable to expect the Project’s emissions level (10,790 metric tons of CO_{2e} per year) to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project’s emissions total at build-out represents the maximum emissions inventory for the Project as California’s emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State’s environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project is consistent with the Executive Orders’ goals.

The Climate Change Scoping Plan recognizes that AB 32 establishes an emissions reduction trajectory that will allow California to achieve the more stringent 2050 target: “These [GHG emission reduction] measures also put the State on a path to meet the long-term 2050 goal of reducing California’s greenhouse gas emissions to 80 percent below 1990 levels. This trajectory is consistent with the reductions that are needed globally to stabilize the climate.”⁶⁸ Also, CARB’s First Update provides that it “lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050,” and many of the emission reduction strategies recommended by CARB would serve to reduce the Project’s post-2020 emissions level to the extent applicable by law:^{69,70}

⁶⁶ California Air Resources Board, *Climate Change Scoping Plan*, December 2008, page 117.

⁶⁷ California Air Resources Board, *First Update to the Climate Change Scoping Plan*, May 2014, page 32.

⁶⁸ CARB, *Climate Change Scoping Plan*, *op. cit.*, page 15.

⁶⁹ CARB, *First Update to the Climate Change Scoping Plan*, *op. cit.*, page 4. See also *id.* at pp. 32–33 (recent studies show that achieving the 2050 goal will require that the “electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles.”)

⁷⁰ CARB, *First Update to the Climate Change Scoping Plan*, *op. cit.*, Table 6: Summary of Recommended Actions by Sector, pages 94-99.

- **Energy Sector:** Continued improvements in California’s appliance and building energy efficiency programs and initiatives, such as the State’s zero net energy building goals, would serve to reduce the Project’s emissions level.⁷¹ Additionally, further additions to California’s renewable resource portfolio would favorably influence the Project’s emissions level.⁷²
- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project’s emissions level.⁷³
- **Water Sector:** The Project’s emissions level will be reduced as a result of further enhancements to water conservation technologies.⁷⁴
- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the Project’s emissions level.⁷⁵

The Climate Change Scoping Plan identifies a cap-and-trade program as one of the strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020 and ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap will be able to trade permits to emit GHGs within the overall limit.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed “covered entities”) by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32’s emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program’s duration. The Cap-and-Trade Program provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. The Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory architecture adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State’s emissions forecasts and the effectiveness of direct regulatory measures.

As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California’s GHG emissions.

⁷¹ *Ibid.*, pages 37-39, and 85.

⁷² *Ibid.*, pages 40-41.

⁷³ *Ibid.*, pages 55-56.

⁷⁴ *Ibid.*, page 65.

⁷⁵ *Ibid.*, page 69.

While the 2020 cap would remain in effect post-2020,⁷⁶ the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions. However, CARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The “recommended action” in the First Update to the Climate Change Scoping Plan for the Cap-and-Trade Program is: “Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target.”⁷⁷ The “expected completion date” for this recommended action is 2017.⁷⁸

In addition to CARB’s First Update, in January 2015, during his inaugural address, Governor Jerry Brown expressed a commitment to achieve “three ambitious goals” that he would like to see accomplished by 2030 to reduce the State’s GHG emissions: (1) increasing the State’s Renewable Portfolio Standard from 33 percent in 2020 to 50 percent in 2030, (2) cutting the petroleum use in cars and trucks in half, and (3) doubling the efficiency of existing buildings and making heating fuels cleaner.⁷⁹ These expressions of Executive Branch policy may be manifested in adopted legislative or regulatory action through the State agencies and departments responsible for achieving the State’s environmental policy objectives, particularly those relating to global climate change.

Further, recent studies shows that the State’s existing and proposed regulatory framework can allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050. Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the Statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.⁸⁰

For the reasons described above, the Project’s post-2020 emissions trajectory is expected to follow a declining trend, consistent with the establishment of the 2030 and 2050 targets.

⁷⁶ California Health & Safety Code § 38551(a) (“The Statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.”).

⁷⁷ CARB, *First Update to the Climate Change Scoping Plan*, *op. cit.*, page 98.

⁷⁸ *Ibid.*

⁷⁹ Transcript: Governor Jerry Brown’s January 5, 2015, Inaugural Address, www.latimes.com/local/political/la-me-pc-brown-speech-text-20150105-story.html#page=1. Accessed March 2, 2015.

⁸⁰ Energy and Environmental Economics (E3), “Summary of the California State Agencies’ PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios,” April 2015; Greenblatt, Jeffrey, Energy Policy, “Modeling California Impacts on Greenhouse Gas Emissions,” Vol. 78, pages 158-172. The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state’s goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.

e. Cumulative Impacts

The emissions of a single project will not cause or exacerbate global climate change. It is possible that a substantial increase in GHG emissions from multiple projects throughout the world could result in a cumulative impact with respect to global climate change. CEQA requires that lead agencies consider evaluating the cumulative impacts of GHGs from even relatively small (on a global basis) increases in GHG emissions. Small contributions to this cumulative impact (from which significant effects are occurring and are expected to worsen over time) may be potentially considerable and therefore significant. A cumulatively considerable impact is the impact of a project in addition to the related projects. However, in the case of global climate change, the proximity of the project to other GHG-generating activities is not directly relevant to the determination of a cumulative impact. Although the State requires Metropolitan Planning Organizations and other planning agencies to consider how region-wide planning decisions can impact global climate change, currently no established non-speculative method exists to assess the cumulative impact of proposed independent private-party development projects.

Although the County of Los Angeles CCAP sets an unincorporated Countywide target for 2020 GHG emissions, which equates to approximately 11 percent below 2010 emissions, the CCAP shows that the reductions are not expected to occur uniformly from all sources or sectors of GHG emissions (refer to Table 4-1 of the CCAP). The County has estimated GHG reductions from many of the strategies and local actions; however, some of the strategies and local actions are not quantified and not included in the CCAP target pending project implementation and metrics to track emissions reductions.

Additionally, CARB has set targets specific to the transportation sector (land use-related transportation emissions), for example, and under SB 375 SCAG must incorporate these GHG-reduction goals into the Regional Transportation Plan and demonstrate that its Sustainable Communities Strategy or Alternative Planning Strategy is consistent with the Regional Housing Needs Assessment. One of the goals of this process is to ensure that the efforts of State, regional, and local planning agencies accommodate the contemporaneous increase in population and employment with a decrease in overall GHG emissions. For example, adopting zoning designations that reduce density in areas which are expected to experience growth in population and housing needs, is seen as inconsistent with anti-sprawl goals of sustainable planning. Although development under a reduced density scenario results in lower GHG emissions from the use of that land compared to what is currently or hypothetically allowed (by creating fewer units and fewer attributable vehicle trips), total regional GHG emissions will likely fail to decrease at the desired rate or, worse, increase if regional housing and employment needs of an area are met with a larger number of less-intensive development projects. Additionally, many of the Project-related GHG emissions source sectors, such as electricity generated in-state or imported and combustion of transportation fuels, are covered-entities are under the Cap-and-Trade Program and would be reduced sector-wide. Therefore, it is not simply a cumulative increase in regional development or the resultant GHG emissions that threatens GHG reduction goals.

The land use sector can accommodate growth and still be consistent with Countywide plans to reduce GHG emissions. To that end, the County will continue to develop programs to guide future building and transportation development towards minimized resource consumption and lowered resultant pollution. The County's adopted CCAP, Green Building Standards Code, and LID Ordinance includes mandatory measures. However, some of the strategies and local actions in the CCAP and the Green Building Standards Code also include voluntary options applicable to and chosen by each individual project developer, and their efficacy in

reducing GHG emissions can vary. In addition, the emissions models used for project-level evaluations do not fully reflect improvements in technology and other reductions in GHG emissions that are likely to occur in the future pursuant to State regulations, such as the model year 2017-2025 vehicle emission standards, as well as other future federal and/or State regulations. Therefore, it is not possible or meaningful to calculate emissions from each of the identified related projects and compare that with a numeric threshold or reduction target.

4. MITIGATION MEASURES

The Project would result in less than significant impacts with respect to emissions of GHG emissions and would be consistent with applicable GHG emissions reductions plans, policies, or regulations. Therefore, no mitigation measures would be required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant and no mitigation measures would be required.

4.G HYDROLOGY AND WATER QUALITY

1. INTRODUCTION

This section describes relevant regulations and existing conditions, and analyzes the Project's potential to result in impacts associated with hydrology and water quality, including violation of water quality standards, degradation of water quality, construction-related stormwater runoff impacts, operational stormwater runoff impacts, and impacts on beneficial uses in receiving water bodies. Information in this section is in part based on information and findings of the *Hydrology Study for Rowland Heights Plaza and Hotel* (Hydrology Study)¹, *Low Impact Development*,² the *Geotechnical Investigation and Liquefaction Evaluation* (Geotechnical Report),³ and the *Update of Geotechnical Report and Conceptual Grading Plan Review* (Updated Geotechnical Report)⁴. Copies of the above reports are included in Appendices F and D of this Draft EIR, respectively.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Project Site

The 14.85-acre Project Site exhibits a gently rolling topography with a northwest-southeast trending high point and an on-site elevation difference of approximately 40 feet. The Los Angeles County Hydrology Manual indicates the Project Site consists of soil types 003 (northerly quarter) and 017 (southerly quarter), which are Chino Silt Loam and Yolo Clay Loam, respectively. Borings found that subsurface soil layers are comprised of cobbles and shallow bedrock, and that liquefiable soils are at three of the proposed building locations. Thus, the Geotechnical Report recommends against allowing groundwater infiltration at the Project Site to maintain safe building design.

The Project Site is largely undeveloped, consisting primarily of non-native grasses and brush that have colonized former agricultural fields, and scattered trees, including palms, near the eastern edge. A partially channelized storm drain is located along the northern property boundary. This partially channelized storm drain constitutes the upstream segment of the Miscellaneous Transfer Drain (MTD) No. 1000 Line B storm drain system maintained by the City of Industry. The on-site segment of MTD No. 1000 Line B receives upstream flows from a County 84-inch reinforced concrete pipe (RCP) that flows across the Project Site in a south to north direction along the eastern property boundary. At the northeast corner, the 84-inch RCP makes a 90-degree turn, where it daylight into MTD No. 1000 Line B. The 50-year-storm peak flow rate indicated at the point of discharge is approximately 515 cubic feet per second (cfs). After flowing east-to-west across the City of Industry portion of the Site, MTD No. 1000 Line B continues into a 94-inch headwall

¹ *Thienes Engineering, Hydrology Study for Rowland Heights Plaza and Hotel PM 072916, 18800 Gale Avenue, Los Angeles County, California, September 3, 2015.*

² *Thienes Engineering, Low Impact Development (LID) for Rowland Heights Hotel Development, Gale Avenue and Nogales Street, Los Angeles County, California, December 9, 2015.*

³ *Southern California Geotechnical, Geotechnical Investigation and Liquefaction Evaluation, Proposed Mixed Use Development, 18800 East Gale Avenue, Los Angeles County, California, February 3, 2014.*

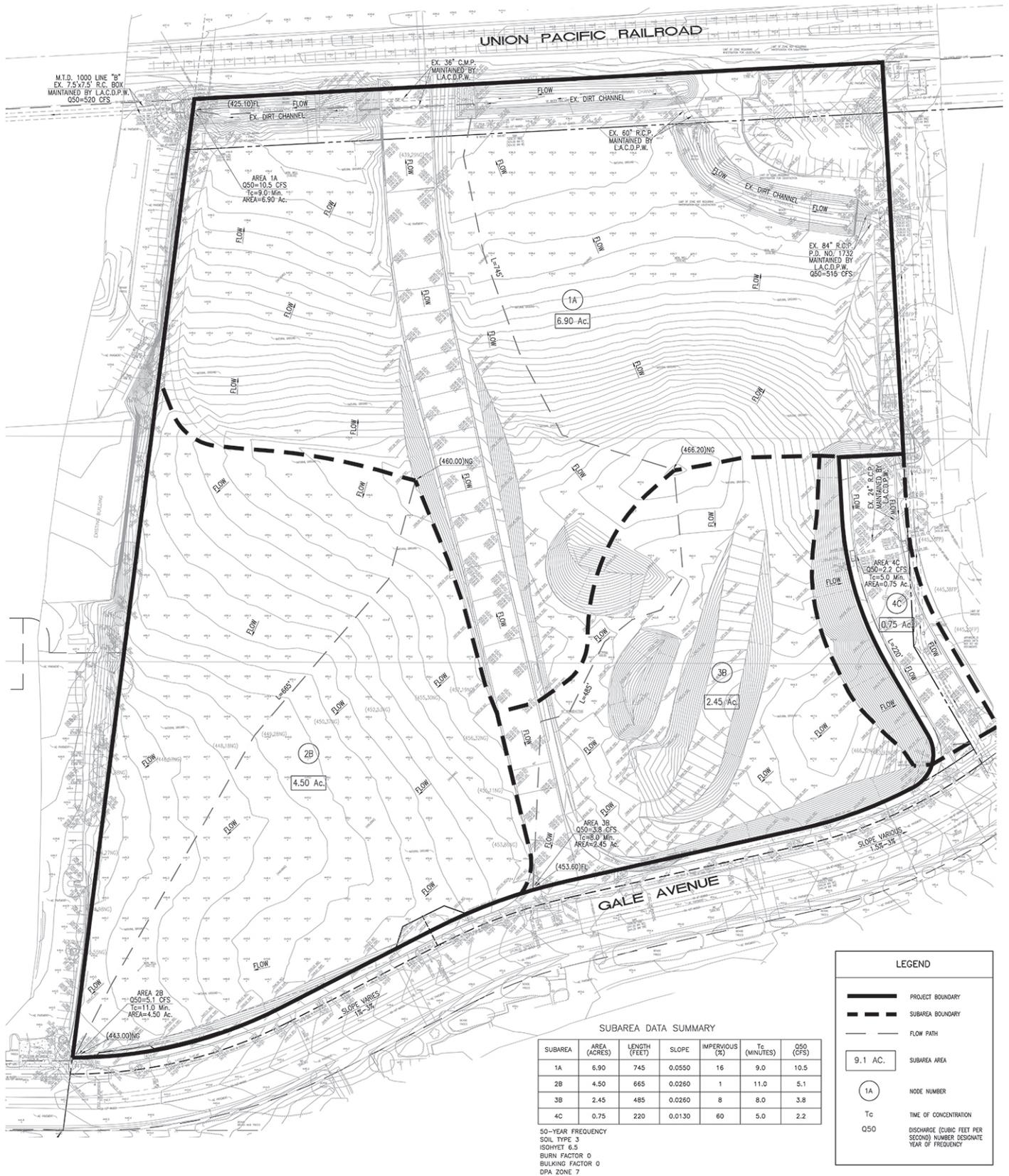
⁴ *Southern California Geotechnical, Update of Geotechnical Report and Conceptual Grading Plan Review, Proposed Mixed Use Development, 18800 East Gale Avenue, Los Angeles County, California, September 10, 2014.*

and 7.5-foot-tall by 7.5-foot-wide concrete box culvert on the adjacent property near the northwest corner of the Project Site. The 50-year-storm peak flow rate indicated at the receiving headwall is 520 cfs, which represents a 5.0 cfs increase from where the 84-inch RCP daylights to allow for permitted stormwater flows from the Project Site. The partially channelized segment of MTD No. 1000 Line B supports willows and other riparian and upland vegetation, although it is periodically cleared as required by the County and City of Industry Public Works Departments to maintain storm flow capacity.

Other on-site improvements include the temporary grading and infrastructure improvements for the Alameda Corridor-East Authority (ACE) Nogales Street Grade Separation Project. These improvements include a three-lane detour road (known as New Charlie Road) within a temporary construction easement, together with a temporary at-grade railroad crossing to the north. The roadway averages 40 feet in width and includes two 36-inch corrugated metal pipes, headwalls, and concrete transitions under New Charlie Road where it crosses MTD No. 1000 Line B. Catch basins are installed at the northern end of New Charlie Road to convey runoff from the roadway directly to MTD No. 1000 Line B. Other improvements include a temporary surface parking lot at the southeast corner of the Project Site. Stormwater runoff from this parking lot sheet flows to a catch basin at the center of the lot, which conveys flows directly to the 84-inch storm drain.

The improvements of the Nogales Street Grade Separation Project would remain in place until Project construction commences, and as such, the hydrological conditions with the improvements in place are the appropriate environmental baseline for the purposes of this CEQA analysis. As shown in **Figure 4.G-1, Existing Site Drainage Areas**, the Site's topography in combination with the temporary improvements result in three larger drainage subareas (Subareas A, B, and C) consisting of four smaller drainage subareas (Subareas 1A, 2B, 3B, and 4C). Subarea 1A consists of the northern 6.90 acres of the Project Site, including the vacated Railroad Street, where stormwater runoff sheet flows directly to the partially channelized MTD No. 1000 Line B. Subarea 1A also receives sheet flow from the northern portion of New Charlie Road via catch basins along the roadway shoulder. Subarea 2B consists of 4.50 acres at the southwest portion of the Project Site, while Subarea 3B consists of 2.45 acres at the southcentral portion. Stormwater runoff from Subareas 2B and 3B sheet flows directly to Gale Avenue, where flows continue westerly to a curb-opening catch basin at Gale Avenue's intersection with Coiner Court. Subarea 2B also drains stormwater runoff from the southern portion of New Charlie Road via direct sheet flow onto Gale Avenue. Subarea 4C consists of a 0.75-acre surface parking lot and shared driveway entrance at the southeast corner of the Project Site. Stormwater runoff from Subarea 4C sheet flows to the center of the parking lot, where a catch basin and 24-inch RCP convey flows to the existing 84-inch RCP. A brief description of the existing drainage subareas, tributary size, and flow rates is included in **Table 4.G-1, Description of Existing On-Site Drainage Subareas**, below.

The catch basin on Gale Avenue at its intersection with Coiner Court is part of the MTD No. 1000 Line A storm drain system. At the catch basin, MTD No. 1000 Line A consists of a south to north flowing 12-foot-tall by 10-foot-wide concrete box culvert below Coiner Court. MTD No. 1000 Line A converges with MTD No. 1000 Line B at the railroad tracks, where it connects with MTD No. 465 and continues to flow northerly until it outfalls at San Jose Creek.



Existing Site Drainage Areas

Rowland Heights Plaza and Hotel Project
Source: Thienes Engineering, Inc., 2015.

FIGURE
4.G-1

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Table 4.G-1

Description of Existing On-Site Drainage Subareas

On-Site Drainage Subarea	Size (ac)	50-Year Storm Flow (Q50)(cfs)	Time of Concentration (Tc)(mins)	Description
1A	6.90 ac	10.5 cfs	9.0 mins	Drains northern portion of Project Site. Runoff sheet flows directly to the partially channelized MTD No. 1000 Line B.
2B	4.50 ac	5.1 cfs	11.0 mins	Drains southwest portion of the Project Site. Runoff sheet flows directly to Gale Avenue, then westward to a catch basin at Gale Avenue's intersection with Coiner Court.
3B	2.45 ac	3.8 cfs	8.0 mins	Drains southcentral portion of the Project Site. Runoff sheet flows directly to Gale Avenue, then westward to a catch basin at Gale Avenue's intersection with Coiner Court.
4C	0.75 ac	2.2 cfs	5.0 mins	Drains temporary surface parking lot and shared driveway at southeast corner of Project Site. Runoff sheet flows into catch basins, which convey flows to the 84-inch RCP.

Source: Information, Thienes Engineering, September 2015. Summary, PCR Services Corporation, June 2015.

(2) Master Plan Drainage

The County designates the Project Site as being within Storm Drain System Subarea 76B, which includes the MTD No. 1000 storm drain system and is part of the San Jose Creek Watershed. Based on calculations provided by the Los Angeles County Department of Public Works (LACDPW), allowable discharge from the Project Site to the County storm drain system is 2.12 cfs per acre. From the County drainage map, Subarea 76B appears to drain entirely to the north, but the Project Site's topography creates a high point where stormwater runoff drains to the south. However, all runoff from the Project Site ultimately drains to Subarea 76B via a catch basin on Gale Avenue and MTD No. 1000 Line A. San Jose Creek Reach 1 (San Gabriel River to Temple Street) is listed on California's 2010 303(d) List under Criteria 5⁵ as being impaired for ammonia, coliform bacteria, total dissolved solids, toxicity, and pH.⁶ Existing Beneficial Uses listed for San Jose Creek include Wildlife. Imminent Beneficial Uses include Groundwater Recharge and Warm Freshwater Habitat. Potential Beneficial Uses are limited to Municipal.⁷

⁵ Category 5 includes water segments where standards are not met and a Total Maximum Daily Load (TMDL) is required, but not yet completed, for at least one of the pollutants being listed for this segment.

⁶ State Water Resources Control Board, 2010 California 303(d) List of Water Quality Limited Segments, Region 4, San Jose Creek Reach 1, http://www.waterboards.ca.gov/water_issues/programs/tmdl/2010state_ir_reports/category5_report.shtml. Accessed June 19, 2015.

⁷ Los Angeles Regional Water Quality Control Board, Table 2-1: Beneficial Uses of Inland Surface Waters, http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/Beneficial_Uses/ch2/Revised%20Beneficial%20Use%20Tables.pdf. Accessed June 16, 2015.

(3) Flood Zones

The Project Site is mapped by the Federal Emergency Management Agency (FEMA) as lying within a Zone X area, which is an “other Flood Area” but not a Special Flood Hazard Area (SFHA).⁸ Zone X areas are defined as lying within a 0.2 percent annual chance flood hazard zone, defined as an area with a 0.2 percent annual chance of flooding in any given year (500-year flood); or a 1.0 percent annual chance flood (100-year flood area) with average depths of less than one foot or with drainage areas less than one square mile. Zone X also includes areas protected by levees from 1.0 percent chance flood. Such areas are located outside of the base flood areas established by FEMA for setting flood insurance requirements and are not considered to be within a 100-year flood hazard area.

b. Regulatory Framework Summary

Following is a discussion of the regulations and ordinances that apply to development at the Project Site. Specific provisions of these regulations that pertain to the Project are listed in the Impact Analysis section below.

(1) Federal

(a) National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 mandate FEMA to evaluate flood hazards. FEMA provides flood insurance rate maps (FIRMs) for local and regional planners to promote sound land use and development practices by identifying potential flood areas based on the current conditions. To delineate a FIRM, FEMA conducts engineering studies referred to as flood insurance studies. Using information gathered in these studies, FEMA engineers and cartographers delineate special flood hazard areas (SFHA) on FIRMs.

The Flood Disaster Protection Act requires owners of all structures in identified SFHAs to purchase and maintain flood insurance as a condition of receiving federal or federally related financial assistance, such as mortgage loans from federally insured lending institutions. Community members within designated areas are able to participate in the National Flood Insurance Program (NFIP) afforded by FEMA.

(b) Clean Water Act

The Clean Water Act (CWA), formerly known as the Federal Water Pollution Control Act, was first introduced in 1948, with major amendments in the 1960s, 1970s, and 1980s. The CWA authorizes federal, state, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of state waters and tributaries. Amendments to the Clean Water Act in 1972 established the National Pollutant Discharge Elimination System (NPDES) permit program, which prohibits discharge of pollutants into the nation’s waters without procurement of a NPDES permit from the U. S. Environmental Protection Agency (USEPA). Although federally mandated, the NPDES permit program is generally administered at the state level.

⁸ Federal Emergency Management Agency, *Flood Insurance Rate Map, Map Number 06037C1875F, effective date September 26, 2008.*

The CWA was amended in 1987 requiring the USEPA to create specific requirements for discharges. In response to the 1987 amendments to the CWA, Phase I of the USEPA NPDES Program required NPDES permits for: (1) Municipal Separate Storm Sewer Systems (MS4) generally serving, or located in, incorporated cities with 100,000 or more people (referred to as municipal permits), (2) 11 specific categories of industrial activity (including landfills), and (3) construction activity that disturbs five acres or more of land. As of March 2003, Phase II of the NPDES Program extends the requirements for NPDES permits to numerous small municipal separate storm sewer systems, construction sites of one to five acres, and industrial facilities owned or operated by small municipal separate storm sewer systems, which were previously exempted from permitting.

(i) CWA Section 303(c)(2)(b)

CWA Section 303(c)(2)(b) requires states to adopt water quality standards for all surface waters of the United States based on the water body's designated beneficial use. These water quality standards must be updated on a triennial basis. Where multiple uses exist, water quality standards must protect the most sensitive use.

The USEPA has also delegated responsibility for implementation of portions of the CWA, including water quality control planning and control programs, such as the NPDES permit program, to the State Water Resources Control Boards (SWRCB). The SWRCB has elected to adopt one Statewide general permit for construction activity at this time, SWRCB Order No. 99-08-DWQ, NPDES General Permit No. CA000002 (General Activities Construction Permit [GCASP]). The GCASP applies to all stormwater discharges associated with construction activity, except for those on tribal lands, those in the Lake Tahoe Hydrologic Unit, and those performed by the California Department of Transportation (Caltrans). Currently, the GCASP requires all dischargers, where construction activity disturbs one acre or more, to conduct the following:

- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP), which specifies Best-Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States; and
- Perform inspections of all BMPs.

(ii) CWA Section 303(d) and Total Maximum Daily Loads

CWA Section 303(d) bridges the technology-based and water quality-based approaches for managing water quality. Section 303(d) requires that states make a list of waters that are not attaining standards after the technology-based limits are put in place. For waters on this list (and where the USEPA administrator deems they are appropriate), the states are to develop Total Maximum Daily Loads (TMDLs). TMDLs are established at the level necessary to implement applicable water quality standards. A TMDL must account for all sources of pollutants that cause the water to be listed. Federal regulations require that TMDLs, at a minimum, account for contributions from point sources and nonpoint sources. Pursuant to this requirement, the SWRCB has adopted a list of impaired water bodies, known as the 303(d) list, for the State of California identifying water quality impairments including trash, metals, pathogens, and organic pesticides. Nearby water bodies to the Project Site are discussed in Subsection 2.a.(2), Master Plan Drainage, above. As

discussed therein, San Jose Creek is listed on California's 2010 303(d) List under Criteria 5 as being impaired for ammonia, coliform bacteria, total dissolved solids, toxicity, and pH. Being listed under Criteria 5 indicates that TMDLs have not yet been established or that alternative remediation strategies are being implemented.

(c) Federal Antidegradation Act

The Federal Antidegradation Policy requires states to develop statewide antidegradation policies and identify methods for implementing them.⁹ Pursuant to the Code of Federal Regulations, state antidegradation policies and implementation methods shall, at a minimum, protect and maintain (1) existing in-stream water uses, (2) existing water quality, where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area, and (3) water quality in waters considered an outstanding national resource.

(2) State/Regional

(a) Porter-Cologne Water Quality Act (California Water Code)

The Porter-Cologne Water Quality Control Act established the legal and regulatory framework for California's water quality control. The California Water Code authorizes the SWRCB to implement the provisions of the federal Clean Water Act, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants.

Under the California Water Code, the State of California is divided into nine regional water quality control boards (RWQCBs) governing the implementation and enforcement of the California Water Code and the Clean Water Act. The Project Site is located within Region 4, also known as the Los Angeles Region, (LARWQCB). The RWQCBs develop and enforce water quality objectives and implement plans that will best protect California's waters, acknowledging areas of different climate, topography, geology, and hydrology. Each RWQCB is required to formulate and adopt a Water Quality Control Plan (Basin Plan) for its region. The Basin Plan must adhere to the policies set forth in the California Water Code and established by the SWRCB. The RWQCB is also given authority to issue waste discharge requirements, enforce action against stormwater discharge violators, and monitor water quality.¹⁰ In California, the NPDES stormwater permitting program is administered by the SWRCB.

(b) California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB in 1968.¹¹ Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the State, not just surface waters. The policy states that whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality shall be maintained, and discharges to that water body shall not unreasonably affect present or anticipated beneficial use of such water resource.

⁹ *Code of Federal Regulations, Title 40, Section 131.12.*

¹⁰ *U.S. Environmental Protection Agency, - Clean Water Act, <http://www.epa.gov/lawsregs/laws/cwa.html>. Accessed July 2015.*

¹¹ *State Water Resources Control Board, Resolution No. 68-16, 1968.*

(c) California Toxics Rule

In 2000, the California Environmental Protection Agency (CalEPA) promulgated the California Toxics Rule, which establishes water quality criteria for certain toxic substances to be applied to waters in the State. CalEPA promulgated this rule based on CalEPA's determination that the numeric criteria are necessary in the State to protect human health and the environment. The California Toxics Rule establishes acute (i.e., short term) and chronic (i.e., long term) standards for bodies of water such as inland surface waters and enclosed bays and estuaries that are designated by the LARWQCB as having beneficial uses protective of aquatic life or human health.

(d) NPDES Permit Program

As indicated above, in California the NPDES stormwater permitting program is administered by the SWRCB through its nine RWQCBs. SWRCB Order No. 2009-0009-DWQ (General Permit) was adopted on September 2, 2009. This NPDES permit establishes a risk-based approach to stormwater control requirements for construction projects.

(i) Construction: Stormwater Pollution Prevention Plan

For all construction activities disturbing more than one acre of land, California mandates the development and implementation of SWPPPs. The SWPPP documents the selection and implementation of BMPs, i.e. state-of-the-art control and treatment techniques for reducing environmental impacts, for a specific construction project. The SWPPP also charges owners with stormwater quality management responsibilities. A construction site subject to the General Permit must prepare and implement a SWPPP that meets the requirements of the General Permit.^{12,13}

The SWRCB adopted a General Permit for Stormwater Discharges from Construction Activities (Construction General Permit) on September 2, 2009.¹⁴ The Construction General Permit regulates construction activity, including clearing, grading, and excavation of areas one acre or more in size, and prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance, unless a separate NPDES permit has been issued for those discharges.

To obtain coverage under the Construction General Permit, a developer is required to file a Notice of Intent (NOI) with the appropriate RWQCB and provide proof of the NOI prior to applying for a grading or building permit from the local jurisdiction, and must prepare a State SWPPP that incorporates the minimum BMPs required under the permit, as well as appropriate project-specific BMPs. The SWPPP must be completed and certified by the developer and the BMPs implemented prior to the commencement of construction, and may require modification by a developer during the course of construction as conditions warrant. When project construction is complete, a developer is required to file a Notice of Termination with the RWQCB certifying

¹² State Water Resources Control Board, National Pollutant Discharge Elimination System (NPDES), http://www.waterboards.ca.gov/water_issues/programs/npdes/. Accessed June 16, 2015.

¹³ U.S. Environmental Protection Agency, National Pollutant Discharge Elimination System (NPDES), <http://cfpub.epa.gov/npdes/>. Accessed June 16, 2015.

¹⁴ State Water Resources Control Board, National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity (NPDES Permit No. CAS000002), adopted September 2, 2009.

that all the conditions of the Construction General Permit, including conditions necessary for termination, have been met.

(ii) Operation: Standard Urban Stormwater Mitigation Plan

A Municipal NPDES Permit was issued in December 2001 to Los Angeles County and 84 incorporated permittee cities within the County (Permittee). In November 2012, the LARWQCB adopted an update to the NPDES Permit (Order No. R4-2012-0175). The permit defines the minimum required BMPs that must be adopted by the permittee municipalities and included by developers within plans for facility operations. These treatment control BMPs must be sufficiently designed and constructed to treat or filter the SWQDv, which is defined by the County Low-Impact Development (LID) Manual as the first three-quarters of an inch of stormwater runoff from a 24-hour storm event or the 85th percentile, 24-hour rain event as determined from the Los Angeles County 85th percentile precipitation isohyetal map; post-development peak runoff rates and volumes cannot exceed peak runoff rates and volumes of pre-development conditions. Additional BMPs may be required by ordinance or code adopted by the Permittee and applied in a general way to all projects or on a case-by-case basis.

(3) County

(a) County of Los Angeles Hydrology Manual

Drainage and flood control in the County are subject to review and approval by LACDPW. Storm drains within the County are constructed and maintained by both the Los Angeles County Flood Control District (County Flood Control), LACDPW, and various municipalities. County Flood Control constructs and has jurisdiction over regional facilities such as major storm drains and open flood control channels, while the cities construct and are responsible for local interconnecting tributary drains.

County Flood Control and LACDPW utilize the LACDPW's Hydrology Manual as its basis of design for storm drainage facilities. The LACDPW Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. Areas with sump conditions¹⁵ are required to have a storm drain conveyance system capable of conveying flow from a 50-year storm event.¹⁶ The County also limits the allowable discharge into existing storm drain facilities based on the MS4 Permit and is enforced on all new developments that discharge directly into the County's storm drain system.

Drainage and flood control structures and improvements within the County are subject to review and approval by LACDPW, which requires that all public storm facilities be designed in conformity with the standards set forth by Hydrology Manual. LACDPW reviews and approves storm drain plans prior to construction. Any proposed increases in discharge directly into County facilities, or proposed improvements of County-owned storm drain facilities such as catch basins and storm drain lines, also require approval from County Flood Control to ensure compliance with the County's Municipal NPDES Permit requirements.

¹⁵ A sump or depression is an area from which there is no surface flow outlet.

¹⁶ Los Angeles County Department of Public Works, Hydrology Manual, January 2006, http://ladpw.org/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf. Accessed June 16, 2015.

(b) County Low-Impact Development (LID) Ordinance

In December 2012, the Los Angeles County Board of Supervisors updated the County LID Ordinance (Chapter 12.84 of the County Code [LACC]) in compliance with the 2012 LARWQCB MS4 Permit. The updated LID Ordinance requires the use of LID principles in development projects. LID is a decentralized approach to stormwater management that works to mimic the natural hydrology of the site by retaining precipitation on-site to the maximum extent practicable. LID builds on conventional design strategies by using every softscape and hardscape surface in the development to perform a beneficial hydrologic function by retaining, detaining, storing, changing the timing of, or filtering stormwater and urban runoff. LID encompasses the use of structural devices, engineered systems, vegetated natural designs, and education in order to distribute stormwater and urban runoff across a development site.

Over the past decade, LID has emerged along with technologies and practices that allow a sustainable stormwater management strategy to control stormwater and urban runoff at the source rather than centralized, end-of-pipe controls, LID relies on an integrated system of decentralized, small-scale control measures. These measures range from site design practices to technology-driven LID BMPs. The underlying principle of LID is that undeveloped land does not present a stormwater runoff or pollution problem. The evolved natural hydrology of any given site manages water in the most efficient manner. This most often translates to high rates of infiltration, vegetative interception, and evapotranspiration. LID attempts to offset the effects of development and changes in land cover by preserving or restoring predevelopment hydrology and water quality through a series of small-scale, decentralized, natural, and engineered controls at or near the point where the stormwater runoff is generated. It is a source control option that minimizes stormwater pollution by recognizing the greatest efficiencies are gained by minimizing stormwater generation. This is a process that begins with functional conservation of watershed resources, reducing impacts of development, and then using innovative management practices to meet the stormwater objectives.

To appropriately implement LID, it is important to assess its role in water quality protection. LID is one part of a toolkit that can be used to better manage natural resources and limit the pollution delivered to waterways. It is not independent of watershed planning. To gain optimal benefits, LID must be integrated with appropriate land use programs. LID, by itself, will not deliver the water quality outcomes desired; yet, it provides enhanced stormwater treatment and mitigates excess volume and flow rates. However, if not integrated in a comprehensive fashion, LID techniques can end up as a series of uncoordinated innovative BMPs that have limited water quality benefits. The following site design elements are used to frame the LID approach to stormwater. These elements are addressed through a combination of BMPs.

- Conserve natural areas, soils, and vegetation – Protect areas outside grading limits, incorporate plants to suit soil and drainage conditions, incorporate planting schemes that replicate natural sites, and use vegetative plantings and bioremediation techniques to neutralize soil contaminants.
- Minimize disturbances to natural drainage patterns – Minimize manicured lawns and annual beds as the dominant site elements.
- Minimize and disconnect impervious surfaces – Reduce impervious areas by including landscaping and using pervious pavements where practicable. Reduce the amounts of “hydraulically” connected impervious areas by using downspouts directed toward vegetated areas and installing rain barrels and cisterns below downspouts. Direct runoff from impervious areas to pervious areas. Grade surfaces toward open space with infiltration capacity, and infiltrate runoff a suitable distance from foundations.

- Minimize soil compaction – Restrict compaction and grading to areas that will support structures, as compacted soils suffer from reduced infiltration rates and limit root growth and plant survivability.

(c) County Stormwater and Pollution Runoff Control

LACC Section 12.80 was adopted to protect the health and safety of County residents by protecting the beneficial uses, marine habitats, and ecosystems of receiving waters within the County from pollutants carried by stormwater and non-stormwater discharges. The intent is to enhance and protect the water quality of the receiving waters of the County and the United States. Section 12.80 applies to the discharge, deposit, and disposal of any stormwater and/or runoff to the storm drain system and/or receiving waters within any unincorporated area covered by a NPDES municipal stormwater permit.

(d) Los Angeles County Municipal Separate Stormwater System Permit

USEPA regulations require that MS4 permittees implement a program to monitor and control pollutants being discharged to the municipal system from both industrial and commercial projects that contribute a substantial pollutant load to the MS4. In November 2012, the LARWQCB adopted Order No. R4-2012-0175 (CAS004001) (Order) under the Clean Water Act and the Porter-Cologne Act. This Order is the NPDES Permit or MS4 Permit for municipal stormwater and urban runoff discharges within Los Angeles County.

(e) Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties

As required by the California Water Code, the LARWQCB has adopted the “Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties” (LA Basin Plan). Specifically, the LA Basin Plan designates beneficial uses for surface and groundwaters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's antidegradation policy, and describes implementation programs to protect all waters in the Los Angeles region. In addition, the LA Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. Those of other agencies are referenced in appropriate sections throughout the LA Basin Plan.¹⁷

The LA Basin Plan is a resource for the RWQCB and others who use water and/or discharge wastewater in the Los Angeles Region. Other agencies and organizations involved in environmental permitting and resource management activities also use the LA Basin Plan. Finally, the LA Basin Plan provides valuable information to the public about local water quality issues.

(f) County Wet Weather Erosion Control Plan

Title 31 (Building Code), Appendix J, Section J111.3 of the LACC requires that all active grading projects not completed prior to November 1, 2015 submit a Wet Weather Erosion Control Plans (WWECP) by October 1, to verify that the plans comply with the County's NPDES permit requirements. The WWECP requirement also extends to projects requiring a grading permit even if they involve less than one acre of disturbed area. No building or grading permit can be issued during the storm season until the applicant has satisfied this

¹⁷ California Regional Water Quality Control Board, *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*, adopted June 13, 1994 http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/. Accessed June 16, 2015.

requirement. The WVECP must include specific BMPs to minimize the transport of sediment and protect public and private property from the effects of erosion, flooding, or the deposition of mud, debris, or construction-related pollutants. The BMPs shown on the WVECP must be installed on or before October 15.

(4) City of Industry

(a) City of Industry Municipal Code

Chapter 13.16 (Storm Water and Urban Runoff Pollution Control) of the City of Industry Municipal Code (CIMC) requires development projects implement site-specific BMPs in accordance with the County LID Ordinance to reduce the discharge of pollutants to the maximum extent possible. Chapter 13.17 of the CIMC (Standard Urban Storm Water Mitigation Plan Implementation) further stipulates that no new development shall increase the peak rate of discharge of storm water from the developed site if this increase would make downstream erosion more probable. Chapter 13.17 also requires BMPs to be designed in accordance with Tables 1 and 2 of the approved BMP Guidebook and/or County LID Ordinance, and establishes guidelines for the maintenance of site-specific BMPs. Parking lots are required to provide for effective treatment or infiltration of stormwater before it is discharged into storm drains. The City of Industry relies on the methodology established in the Los Angeles County LID Manual, which is based on the American Society of Civil Engineers (ASCE) Manual of Practice No. 87 to calculate permitted stormwater runoff volumes and assign site-specific BMPs to maintain water quality. Specifically, as with the County LID Manual, Chapter 13.17.120 (Design Standards for Best Management Practices, or BMPs) of the CIMC stipulates that the volume of runoff detained on the Project Site be equal to the volume of stormwater runoff produced by a storm event of three-quarters inch or 85 percent of the total runoff volume been measured for 24-hour periods of the same area. A discussion of the Los Angeles County LID Manual is found above.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis addresses potential impacts on hydrology/drainage and water quality. The analysis is based, in part, on the Hydrology Study prepared by Thienes Engineering included as Appendix F of this Draft EIR. The Hydrology Study was prepared based on a review of documents from and methodologies specified by the LACDPW, including the Hydrology Manual (January 2006) and the Low Impact Development Standards Manual (LID Manual) (February 2014) for use in developing BMPs for the Project. The analysis is also based on the Geotechnical Report and Updated Geotechnical Report prepared for this Project, and provided in Appendices D-1 and D-2 of this Draft EIR, which includes the results of site sampling to determine the depth of groundwater at the Project Site.

(1) Water Quality

Water quality impacts were assessed by characterizing the types of pollutants and/or effects on water quality likely to be associated with construction and operation of the Project, Project design features to treat contaminants, and expected contaminant flows with Project implementation.

(2) Hydrology

The analysis of hydrology impacts includes a calculation of pre-project and post-project runoff rates during a 50-year storm event. Potential impacts to the storm drain system were analyzed by comparing the

calculated pre-project runoff rates to the calculated post-project runoff rates to determine the Project's effect on drainage flows. The Project's proposed on-site system for collecting, treating, and reclaiming stormwater is described and reviewed for consistency with applicable regulatory measures.

b. Thresholds of Significance

The potential for hydrology and water quality impacts is based on thresholds derived from Los Angeles County Department of Regional Planning Initial Study Checklist screening questions, which are based in part on Appendix G of the State *CEQA Guidelines*. These questions are as follows.

10. Hydrology and Water Quality. Would the project:

- a. Violate any water quality standards or waste discharge requirements?
- b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?
- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- e. Add water features or create conditions in which standing water can accumulate that could increase habitat for mosquitoes and other vectors that transmit diseases such as the West Nile virus and result in increased pesticide use?
- f. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- g. Generate construction or post-construction runoff that would violate applicable stormwater NPDES permits or otherwise significantly affect surface water or groundwater quality?
- h. Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84 and Title 22, Ch. 22.52)?
- i. Result in point or nonpoint source pollutant discharges into State Water Resources Control Board-designated Areas of Special Biological Significance?
- j. Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?
- k. Otherwise substantially degrade water quality?
- l. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, or within a floodway or floodplain?

- m. Place structures, which would impede or redirect flood flows, within a 100-year flood hazard area, floodway, or floodplain?
- n. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- o. Place structures in areas subject to inundation by seiche, tsunami, or mudflow?

The Initial Study determined that the Project would have no impact or less than significant impacts with respect to b) the depletion of groundwater or interference with groundwater recharge, e) the creation of conditions conducive to standing water that could serve as habitat for disease vectors, i) pollution discharges into State-designated Areas of Special Biological Significance, j) the use of on-site wastewater treatment plants, l) the placement of housing within an area delineated as a flood hazard or floodplain, m) the placement of structures within a flood hazard area or floodplain, n) the exposure to people or structure to flood hazards resulting from levee or dam failure, or o) the placement of structures in areas subject to inundation by seiche, tsunami, or mudflow. These environmental topics are not evaluated in this EIR.

Based on these factors, the Project would have a potentially significant impact related to hydrology and water quality if it would:

- HYDRO-1** Violate any water quality standards or waste discharge requirements
- HYDRO-2** Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site
- HYDRO-3** Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site
- HYDRO-4** Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff
- HYDRO-5** Generate construction or post-construction runoff that would violate applicable stormwater NPDES permits or otherwise significantly affect surface water or groundwater quality
- HYDRO-6** Conflict with the Los Angeles County Low Impact Development Ordinance (LACC, Title 12, Ch. 12.84 and Title 22, Ch. 22.52)
- HYDRO-7** Otherwise substantially degrade water quality

c. Project Characteristics

(1) Proposed Storm Drain System

The Project proposes on-site drainage improvements to accommodate the proposed commercial development, including undergrounding and fully channelizing the on-site segment of MTD No. 1000 Line B. Specifically, the Project would involve the replacement of the partially channelized storm drain with a 90-

inch RCP. The proposed RCP would be sized down to 84 inches in diameter where it connects with the existing County 84-inch RCP at the northeast corner of the Project Site.

The proposed 90-inch RCP would be constructed at the same elevation as the current storm drain channel, which is the lowest point on the Site, to maintain existing points of connection with off-site infrastructure. Project uses above the proposed RCP would be within the City of Industry parcel and limited to 75 surface parking spaces and associated hardscapes and landscaping. The existing headwalls at the County facilities would be removed, as would the existing pipes and concrete headwalls at New Charlie Road. The proposed RCP would be reviewed and approved by the LACDPW as part of the Project's Drainage Concept Review and by the City of Industry during its review of Project final storm drain plans. All necessary permits would be obtained prior to construction, and the proposed storm drain system would ultimately be transferred to Los Angeles County for ongoing maintenance.

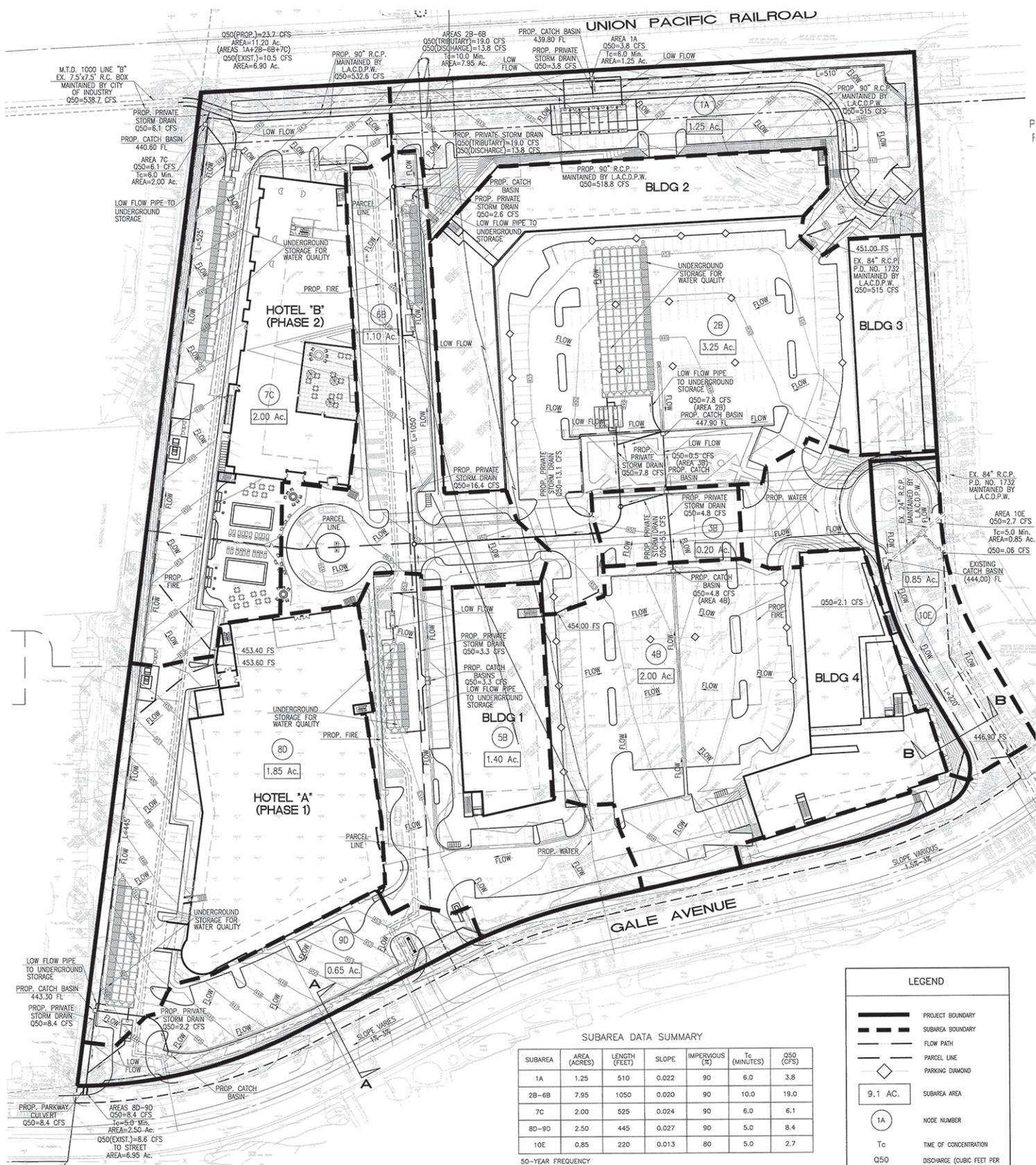
To accommodate on-site flows, a privately maintained storm drain system would be constructed. The Project's proposed storm drain system and resulting drainage subareas are depicted in **Figure 4.G-2, Proposed Stormwater Management Plan**. As shown, the proposed drainage system would divide the Project Site into two larger drainage subareas, one flowing northerly to MTD No. 1000 Line B (i.e., the proposed 90-inch RCP) and the other southerly to MTD No. 1000 Line A via Gale Avenue. Project improvements would result in 10 smaller drainage subareas within these two larger subareas.

The proposed storm drain system would drain Parcel 1 (Commercial Center) through catch basins located in the center parking areas. These catch basins would flow to underground pipes that flow westerly between Building Nos. 1 and 2, then northerly below the ingress/egress driveway between Parcel 1 and Parcels 2/3, ultimately connecting to the proposed 90-inch RCP. On-site tributary areas to these catch basins include Parcel 1's central parking lot, Buildings Nos. 1, 3 and 4, and a portion of Building No. 2 (Subareas 2B-6B on Figure 4.G-2). This storm drain system would also capture sheet flows from the ingress/egress driveway via catch basins along the driveway's eastern curb and gutter. As shown in Figure 4.G-2, the majority of the Project Site (7.95 acres) would drain to this storm drain system. A brief description of the proposed drainage subareas and their acreages/flow rates is found in **Table 4.G-2, Description of Proposed On-Site Drainage Subareas**.

An additional catch basin and storm drain system are proposed at the northerly parking area (Subarea 1A on Figure 4.G-2). Here, runoff from a portion of Building No. 2 and the northern parking lot would be intercepted and conveyed directly to the 90-inch RCP. A small portion of the proposed driveway at the southeast corner of Parcel 1 would surface flow to the existing catch basin in the common driveway via existing curb and gutter. As shown in Figure 4.G-2, 1.25 acres of the Project Site would drain to this storm drain system.

For Parcel 2 (full-service hotel, Subareas 8D-9D on Figure 4.G-2), stormwater runoff would sheet flow in a southwest direction across the subarea into catch basins located in the southwest corner of the parking lot. Runoff would discharge to Gale Avenue via a proposed parkway culvert. Once on Gale Avenue, stormwater flows would continue westerly along the curb and gutter and into the existing catch basin at Gale Avenue's intersection with Coiner Street. As shown on Figure 4.G-2, Subareas 8D to 9D would drain 2.50 acres.

For Parcel 3 (extended-stay hotel, Area 7C on Figure 4.G-2), runoff would sheet flow across the subarea into a catch basin located at the northeast corner of the parking area. A storm drain would then convey runoff to



SUBAREA DATA SUMMARY

SUBAREA	AREA (ACRES)	LENGTH (FEET)	SLOPE	IMPERVIOUS (%)	Tc (MINUTES)	QSO (CFS)
1A	1.25	510	0.022	90	6.0	3.8
2B-6B	7.95	1050	0.020	90	10.0	19.0
7C	2.00	525	0.024	90	6.0	6.1
8D-9D	2.50	445	0.027	90	5.0	8.4
10E	0.85	220	0.013	80	5.0	2.7

50-YEAR FREQUENCY
 SOIL TYPE 3
 SCHWET 6.5
 BURN FACTOR 0
 BULKING FACTOR 0
 DPA ZONE 7

LEGEND

- PROJECT BOUNDARY
- SUBAREA BOUNDARY
- FLOW PATH
- PARCEL LINE
- PARKING DIAMOND
- SUBAREA AREA
- NODE NUMBER
- TIME OF CONCENTRATION
- DISCHARGE (CUBIC FEET PER SECOND) NUMBER DESIGNATE YEAR OF FREQUENCY



Proposed Stormwater Management Plan

Rowland Heights Plaza and Hotel Project
 Source: Thienes Engineering, Inc., 2015.

FIGURE
4.G-2

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Table 4.G-2

Description of Proposed On-Site Drainage Subareas

On-Site Drainage Subarea	Size (ac)	50-Year Storm Flow (Q50)(cfs)	Time of Concentration (Tc)(mins)	Description
1A	1.25 ac	3.8 cfs	6.0 mins	Drains northern parking lot and a portion of Building No. 2 via a catch basin that flows to the proposed 90-inch storm drain.
2B-6B	7.95 ac	19.0 cfs	10.0 mins	Drains Parcel 1 (except Building No. 2) and the ingress/egress driveway via catch basins in in the central parking area and along the ingress/egress driveway. Catch basins flow to underground pipes that flow between Building Nos. 1 and 2, before traveling north along the ingress/egress driveway to the 90-inch storm drain.
7C	2.00 ac	6.1 cfs	6.0 mins	Drains Parcel 3 (extended-stay hotel) and the western portion of the northern parking area via a catch basin at the northwest corner of the Project Site, which drains to the 90-inch storm drain.
8D-9D	2.50 ac	8.4 cfs	5.0 mins	Drains Parcel 2 (full-service hotel) via two catch basins at southwest corner of Project Site, which direct flows to Gale Avenue via a culvert. Runoff then flows west along Gale Avenue to catch basin at intersection with Coiner Court.
10E	0.85 ac	2.7 cfs	5.0 mins	Drains Parcel 2 (full-service hotel) via two catch basins at southwest corner of Project Site, which direct flows to Gale Avenue via a culvert. Runoff then flows west along Gale Avenue to catch basin at intersection with Coiner Court.

Source: Thienes Engineering, May 2015.

the proposed 90-inch RCP. Area tributary to this system consists of the northerly hotel and westerly parking area. As shown on Figure 4.G-2, Subarea 7C would drain 2.00 acres.

Lastly, the proposed shared driveway and a small portion of Parcel 1 (Area 10E on Figure 4.G-2) on the eastern portion of the Project Site would sheet flow north and west to an existing catch basin (installed as part of the Nogales Street Grade Separation Project) located in the center of the shared driveway. The catch basin would continue to drain to the existing 84-inch RCP along the eastern Site boundary. As shown in Figure 4.G-2, Subarea 10E would drain 0.85 acres.

(2) Stormwater Retention and Treatment Measures

The Project proposes on-site detention and filtration devices to maintain County-permitted flow volumes to MTD No. 1000 (i.e., 2.12 cfs/acre) and remove pollutants from stormwater runoff. Subareas 2B-6B would be served by a storm drain system that includes oversized pipes and underground detention basins to store excess flows. Where the Subarea 2B-6B storm drain system connects to the proposed 90-inch RCP, the connecting pipes would be sized to allow only the permitted flow volumes into the proposed 90-inch RCP. The smaller connecting pipes would force excess flows to back up at these connection points and be retained

in the upstream oversized pipes and underground detention basins. The underground detention basins would utilize an impermeable liner to prevent groundwater infiltration and would be designed to store 1.5 times the design capture volume. The Subarea 2B-6B storm drain system would also incorporate BMPs to meet Los Angeles County LID requirements. For instance, initial runoff would be treated with filter inserts at the proposed catch basins to capture larger pollutants such as trash and leaves. Within the storm drain system, the underground storage areas would be equipped with isolator rows to trap additional pollutants. After storage and settling in the oversized pipes and underground storage basins, 1.5 times the design capture volume would then be passed through a manufactured bio-retention device into the proposed 90-inch RCP.

Because Subareas 2B-6B comprise the largest and most complex storm drain system proposed and drain the majority of the Project Site, all runoff in excess of County-permitted volumes would occur within this storm drain system. Stormwater runoff from Subarea 1A on Figure 4.G-2 would drain to the 90-inch RCP undetained, although media filter would be installed at the catch basins to capture pollutants in flows. Stormwater runoff from Subarea 7C on Figure 4.G-2 would also flow undetained to the proposed 90-inch RCP via an underground detention basin with isolator rows and bio-filtration devices to remove stormwater pollutants. Media filters would also be included at the proposed catch basin. Subareas 8D-9D would flow undetained via a proposed culvert to Gale Avenue; however, the system would include media filters at the two catch basins and an underground detention basin with isolator rows and bio-filtration devices to remove pollutants from runoff flows. Lastly, the catch basin in Subarea 10E would include media filters prior to discharging stormwater runoff undetained into the existing 84-inch RCP. Other nonstructural BMPs would also be incorporated into the Project design to meet LID requirements, such as ensuring downspouts do not drain onto exposed soils. The final selection of BMPs would be chosen during the LACDPW Drainage Concept Review and during the City of Industry's review of the Project's final storm drain plans.

d. Project Impacts

(1) Water Quality

Threshold HYDRO-1: A potentially significant impact on water quality would occur if the Project would violate any water quality standards or waste discharge requirements.

Threshold HYDRO-5: A potentially significant impact on water quality would occur if the Project would generate construction or post-construction runoff that would violate applicable stormwater NPDES permits or otherwise significantly affect surface water or groundwater quality.

Threshold HYDRO-6: A potentially significant impact on water quality would occur if the Project would conflict with the Los Angeles County Low Impact Development Ordinance (LACC, Title 12, Ch. 12.84 and Title 22, Ch. 22.52).

Threshold HYDRO-7: A potentially significant impact on water quality would occur if the Project would otherwise degrade water quality.

Impact Statement HYDRO-1: *Construction and operation of the Project would comply with all applicable regulatory requirements governing water quality. Compliance with applicable regulatory requirements and implementation of project design features, including BMPs as part of the Project's SWPPP and LID compliance, would ensure that construction and operational water quality impacts are less than significant.*

(a) Project Construction

Construction of the Project would involve site preparation activities, including excavation and grading. Such activities would temporarily alter the existing drainage patterns and water flows within the Project Site. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. However, as the construction site would be greater than one acre, the Project developer would be required to obtain an NPDES General Construction Activity Permit and County requirements and to implement appropriate BMPs to address water hydrology and water quality impacts during construction and operation. Prior to the start of construction, an NOI and SWPPP would be prepared to fulfill the California SWRCB Order No. 99-08-DWQ, NPDES General Permit No. CA000002 (GCASP) and County LID requirements, as well as comply with the LACDPW 2006 Hydrology Manual. In accordance with the requirements of the permit, the Project developer would implement a SWPPP, which would specify BMPs and erosion control measures to be used during construction that would address both runoff conditions and potential pollution. BMPs would include but not be limited to such measures as street sweeping and vacuuming, sand bag barriers, storm drain inlet protection, wind erosion control, and stabilized construction entrances and exits. In addition, the Project developer would be required to comply with County grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Implementation of the SWPPP and associated BMPs would reduce or eliminate the discharge of potential pollutants from stormwater runoff to the maximum extent practicable. Given the proposed uses for the Project, discharge of ammonia, coliform bacteria, total dissolved solids, toxicity, or pollutants which could affect pH, the constituents for which San Jose Creek (Reach 1) is listed as impaired, is not expected. More specifically, implementation of the BMPs would ensure the quality of stormwater runoff leaving the developed Project area would meet all regulatory standards and maintain the beneficial uses of the San Jose Creek and its downstream waters. With implementation of the construction BMPs, Project construction activities are not anticipated to create pollution, contamination, or nuisance, as defined in Section 13050 of the California Water Code. Additionally, the County would monitor compliance with these requirements as part of the Project approval process.

As discussed above, the Project would fully channelize the on-site segment of MTD No. 1000 Line B. The construction efforts to channelize the storm drain, including earthwork activities, would be subject to the same SWPPP requirements as the Project as a whole, including the implementation of BMPs to reduce the introduction of sediments and pollutants into stormwater flows. Because MTD No. 1000 is part of an active drainage system, construction efforts to channelize the storm drain would occur during the dry period (prior to October 1 and after April 15) or be completed in compliance with an approved WVECP, as required by the LACC. In addition to standards construction measures, BMPs during the installation of the 90-inch RCP would likely include diverting runoff around construction zones and the storage of equipment and materials outside the channel's high water level. The proposed channel design, SWPPP, and WVECP would be reviewed and approved by the LACDPW as part of the Project's Drainage Concept Review and the City of Industry during its review of the Project's final storm drain plans.

In summary, with compliance with NPDES, LARWQCB, and County requirements, Project construction would not violate any water quality standards or waste discharge requirements, result in substantial erosion or siltation, contribute substantial additional sources of polluted runoff, or otherwise substantially degrade surface water quality. As such, impacts to surface water quality associated with Project construction would be less than significant.

(b) Project Operation

Stormwater runoff currently sheet flows over the unimproved portions of the Project Site and the temporary improvements of the Nogales Street Grade Separation Project (i.e., New Charlie Road, parking area). On-site drainage is then conveyed untreated into the MTD No. 1000 storm drain system via its partially channelized segment or Gale Avenue. Runoff from unimproved and temporary surfaces has the potential to contain pollutants such as sediments, nutrients, pesticides, and organic compounds. Hardscapes such as those proposed by the Project could also be expected to increase the concentration of pollutants, oil and grease, suspended solids, metals, gasoline, pathogens, and trash and debris in the runoff flows, among other pollutants.

The addition of impervious surface area and the associated increase in peak runoff volumes could contribute to a potentially adverse impact on surface water quality. However, the Project developer would be required to prepare and implement structural BMPs to be incorporated into the design to address stormwater runoff water quality. Such BMPs would include source control BMPs to prevent pollutants from entering into stormwater discharges and treatment control BMPs to remove pollutants from stormwater discharges. In accordance with NPDES requirements, the treatment control BMPs—media filters and detention basins with filtration systems—would mitigate (treat) the first 0.75 inches of stormwater runoff from a first flush storm event in accordance with the LID Manual. In addition, operation and maintenance measures would be implemented per the County LID requirements to ensure that the BMPs continue to operate properly for the life of the Project. Proper functioning of the filtering systems requires regular inspection to assure that they are not clogged or otherwise defective and are performing as expected. Maintenance may require such actions as removal and changing of media filter, the removal of accumulated sediments, and the replacement of media in the bio-filtration devices. The manufacturers have established recommended procedures for maintenance. Maintenance would be completed on a routine basis by the Project operator. The implementation of BMPs in accordance with the County LID requirements would minimize the introduction of pollutants to the stormwater system prior to discharging runoff to the existing stormwater system at a volume and rate that is within permitted volumes for the Project Site. Further, since the Project Site does not currently include treatment devices or other soil stabilization (i.e. hardscapes), the Project would be expected to improve the water quality or runoff leaving the Project Site, particularly with regard to sediments because unimproved soils/partially channelized storm drains have a greater potential to introduce sediments to runoff flows.

The partially channelized segment of MTD No. 1000 Line B consists of an unlined bottom that increases friction between the channel surface and runoff flows. Sediment and other pollutants introduced to slow-flowing channel segments will settle to the channel bottom, potentially improving water quality. This effect is increased by the presence of vegetation that further reduces flow rates. Conversely, swift-moving flows can increase sediment load when frictional contact lifts sediment into the overlying flow; swift flows also tend to keep sediments suspended longer in the water column. Due to the limited length of the on-site channel segment, roughly 720 feet, any reduction or improvement in water quality from the current state of the channel is negligible, particularly since the channel is cleared periodically to maintain stormwater capacity. As discussed in Section 4.C, Biological Resources, the partially channelized storm drain does not provide meaningful bio-filtration that would be lost by full channelization of the storm drain. Since the Project would fully channelize MTD No. 1000 Line B, the potential for sedimentation to occur from the channel bottom would be negated during periods of swift flow. Any improvement to water quality resulting from reduced flow velocity through the Site would be negated by this reduced potential for sediment loading,

as well as through the incorporation of structural BMPs into the proposed storm drain system that reduce the potential for pollutants to enter runoff flows leaving the Project Site. As discussed above, the proposed channel would be reviewed and approved by the LACDPW prior to approval in accordance with the County LID Manual, ensuring that the proposed 90-inch RCP would not result in substantial erosion or otherwise degrade water quality.

With regard to Biological Resources, as concluded in Section 4.C, Biological Resources, of this Draft EIR, no SWRCB-designated Areas of Special Biological Significance (ASBS) are located within the Project vicinity. Although the partially channelized storm drain is periodically cleared per the LACDPW and City of Industry's desire to maintain storm flow capacity, the storm drain channel currently supports periodic growth of willows and other riparian and upland vegetation. Under the Project, MTD No. 1000 Line B would be fully channelized, resulting in the loss of the riparian and upland vegetation. However, as discussed in Section 4.C, Biological Resources, the loss of this vegetation through the full channelization of the short segment of MTD No. 1000 Line B would result in a less-than-significant impact on biological resources with implementation of Mitigation Measure MM-BIO-1.

In summary, the Project would not increase the level of pollutants entering the stormwater system when compared to existing conditions. Further, the required BMPs have been developed to avoid exceeding the standards of SWPPP and County LID requirements; therefore, through implementation of the BMPs, the Project would meet the applicable water quality requirements, including the County LID Ordinance. The Project would not increase stormwater flows or otherwise result in substantial erosion or siltation. The treated runoff would continue to enter the same drainage system as currently exists and therefore would not alter the direction or movement of potential contaminants that may be present in the runoff. Lastly, the full channelization of the MTD No. 1000 Line B would not result in a significant impact to biological resources. As a result, the Project's construction and operational water quality impacts would be less than significant.

(2) Drainage Patterns and Stormwater Drainage System

Threshold HYDRO-2: A potentially significant impact on drainage patterns and stormwater flows would occur if the Project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site.

Threshold HYDRO-3: A potentially significant impact on drainage patterns and stormwater flows would occur if the Project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site.

Threshold HYDRO-4: A potentially significant impact on drainage patterns and stormwater flows would occur if the Project would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Impact Statement HYDRO-2: *The Project largely would be designed to maintain existing drainage patterns of the site and area. Post-development runoff would be consistent with applicable regulatory requirements; the post-Project site would not result in significant hydrology impacts downstream such that flooding or erosion would occur on or off site. Furthermore, the Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage. Compliance with applicable regulatory requirements and implementation of the project design features,*

including BMPs in accordance the County LID, would ensure that impacts regarding changes in drainage patterns and stormwater flows are less than significant.

(a) Project Construction

The Project Site is largely undeveloped, and areas of excavation and grading would largely mimic the existing ground surface conditions during Project construction. Nonetheless, while the Project Site is under construction, the rate and amount of surface runoff generated would fluctuate, particularly once impervious surfaces are introduced. However, the construction period is short term, and compliance with applicable regulations discussed above would preclude fluctuations that result in flooding. Specifically, the implementation of BMPs outlined in a Site-specific SWPPP would control potential impacts from rain sheet flow, directing runoff into the nearby drainage system, as occurs today. Such BMPs would include, but not be limited to, measures for erosion control, sediment control, non-stormwater management, and materials management. The implementation of the BMPs would ensure the quality of stormwater runoff leaving the Project Site would meet all regulatory standards and thus maintain the beneficial uses of the San Jose Creek and its downstream waters. With implementation of the construction BMPs, Project construction activities are not anticipated to create pollution, contamination, or nuisance. Where impervious surfaces are introduced, they would occur in correlation with the proposed BMPs to maintain permitted runoff volumes.

The County and City of Industry would monitor compliance with these requirements as part of the Project approval process. All grading activities would require grading permits from the LACDPW and the City of Industry, which include requirements and standards designed to limit potential impacts associated with erosion to permitted levels. During the entirety of construction process, stormwater from the Project Site would continue to flow entirely to the MTD No. 1000 storm drain system, which is channelized except for the segment traversing the Project Site. Therefore, the Project would not cause changes in drainage patterns that could increase off-site flooding conditions. Further, there would be no increase in changes to off-site flooding. Channelization of the storm drain would occur during the dry period or under an approved WVECP in accordance with Title 31 of the LACC. Therefore, with compliance with NPDES and County requirements, Project construction would not: 1) violate any water quality standards or waste discharge requirements, 2) result in substantial erosion or siltation, 3) contribute substantial additional sources of polluted runoff, or 4) otherwise substantially degrade surface water quality. As such, impacts to surface water quality associated with Project construction would be less than significant.

(b) Project Operation

As discussed above, the Project Site largely consists of pervious surfaces consisting of undeveloped soils with native grasses that have colonized the former agricultural fields, and scattered trees, including palms, near the eastern edge of the property. The Project Site also contains the partially channelized MTD No. 1000 Line B. Under existing conditions, stormwater runoff from the entire Project Site flows to the MTD No. 1000 storm drain system via either Line A or B. Under existing conditions, the on-site segment of MTD No. 1000 Line B receives approximately 515.5 cfs of runoff during a 50-year storm event at its point of discharge at the northeast corner of the Project Site. The facility is designed to receive 520.0 cfs of runoff during a 50-year storm event at its connection to the downstream segments of Line B.

As shown in Table 4.G-2 and Figure 4.G-2, the Hydrology Report concludes that Project implementation would increase the volume of runoff to MTD No. 1000 Line B during a 50-year storm event and reduce the

volume of runoff to MTD No. 1000 Line A. Runoff flows to Line A would be reduced from 8.9 cfs under existing conditions to 8.4 cfs under the Project, a reduction of 0.5 cfs during a 50-year storm event. As there are no noted deficiencies in MTD No. 1000 Line A, the Project's reduction in flow volumes to Line A would not exceed the capacity of the storm drain system. Further, as the entirety of Line A and its downstream water bodies are fully channelized or otherwise stabilized, the Project's reduced flow volumes would not result in substantial downstream erosion or flooding. Moreover, the Hydrology Report notes that stormwater flows discharging to Gale Avenue would not require detention even if flow volumes were to increase; this is because the Project Site and downstream receiving portion of MTD No. 1000 Line A were designed under the assumption that the Project Site would be developed with commercial uses.

With regard to MTD No. 1000 Line B, as outlined in the Project Characteristics discussion above, implementation of the Project would redirect additional runoff flows to Line B so that the majority of the Project Site would ultimately drain to the proposed 90-inch RCP. Specifically, implementation of the Project would result in 11.20 acres (an increase of 0.70 acres over existing conditions) draining to the 90-inch RCP. The RCP's tributary area would include the majority of Parcels 1 and 3 (Subareas 1A, 2B-6B, and 7C) and consist of impervious surface areas draining through catch basins and subterranean pipes that incorporate structural BMPs. Without implementation of the structural BMPs, the Hydrology Report concluded that runoff flows to Line B would increase by 12.9 cfs, to 28.9 cfs, during a 50-year storm event. This volume exceeds the County-permitted runoff volumes of 23.4 cfs by 5.5 cfs during the 50-year storm event. If undetained, flows in excess of County-permitted volumes could exceed the capacity of the Line B storm drain system and potentially result in substantial downstream siltation, erosion, or flooding.

To maintain County-permitted flow volumes, Project design would incorporate structural BMPs into the proposed storm drain system in accordance with County LID requirements. As described in the Project Characteristics discussion above, these BMPs would be designed to temporarily detain excess flows, primarily through the incorporation of properly sized pipes at the connection points with the proposed 90-inch RCP. Excess flows would then back up within the oversized pipes, to be discharged at a later period. The Hydrology Report concluded that the difference between existing and post-development would require storing a small volume (2,267 cubic feet) on the Site during a 50-year storm event. The Hydrology Report concluded this small quantity could easily be accommodated by the oversized pipes and detention basins upstream of the connecting pipes. County and City of Industry review and approval of the proposed stormwater drainage system would ensure on-site retention is adequate for the Project.

Upon implementation of the Project BMPs, the Project Site's contribution to the partially channelized storm drain would be 23.4 cfs during a 50-year storm event. As a result, the Hydrology Study concluded that downstream peak flow rates would be unaffected after the confluence of MTD No. 1000 Lines A and B. Thus, the Project would limit flow volumes to those permitted by the County and would not exceed the capacity of existing or planned stormwater drainage systems.

MTD No. 1000 Line A and Line B ultimately converge just south of the railroad tracks, where the MTD No. 1000 storm drain system connects with the MTD No. 465 storm drain system and continues to flow northerly until it outfalls at San Jose Creek. Thus, as under existing conditions, even with implementation of the Project, runoff from the entire Site would ultimately continue to flow to MTD No. 1000, which has been adequately sized to accommodate permitted stormwater flows from the Project Site. The implementation of structural BMPs would ensure that permitted runoff volumes are not exceeded following Project

implementation. As a result, the Hydrology Report concludes that downstream peak flow rates would be unaffected after the confluence of MTD No. 1000 Lines A and B; impacts with regard to the capacity of the planned stormwater drainage system would be less than significant.

Development of the Project Site as proposed would reduce the potential for sediment to enter stormwater flows because hardscapes and other landscaped areas effectively disperse rainfall energy and stabilize sediments. As the Project Site would continue to drain to the MTD No. 1000 storm drain system, as under existing conditions, the Project would not substantially alter the existing drainage pattern of the site or area. Further, with the incorporation of BMPs intended to remove pollutants from stormwater flows, the Project Site would become compliant with existing stormwater regulations following Project development. As such, the Project would not otherwise degrade water quality or introduce pollutants to stormwater flows.

No potential exists for downstream erosion since Gale Avenue is paved and the remainder of the stormwater system is contained within the subterranean storm drain pipes until its confluence with San Jose Creek, which is tributary to the San Gabriel River. Both San Jose Creek and the San Gabriel River are channelized or otherwise controlled (e.g., a portion of the San Gabriel Riverbed is utilized as a groundwater recharge spreading ground and impounded by inflatable dams) until confluence with the Pacific Ocean. As such, any alteration of existing drainage patterns would not result in substantial erosion or siltation on or off site; project impacts would be less than significant

The full channelization of MTD No. 1000 Line B has the potential to reduce the time of concentration¹⁸ by reducing water friction with the channel lining. However, the receiving headwall and storm drain system at the northwest portion of the Project Site are designed to accommodate permitted runoff volumes from Project Site. The proposed channelization would follow the existing course of the existing channel. Further, full channelization of MTD No. 1000 Line B would reduce the potential for sedimentation along the channel by stabilizing the channel surfaces. As a result, the proposed 90-inch RCP would not substantially alter the existing drainage pattern or result in substantial erosion from the Project. No potential for downstream erosion exists since the storm drain system and its receiving waters are channelized or otherwise stabilized; impacts would be less than significant.

Regarding the Project's proposed hydraulics, the Hydrology Study determined that the Site discharge connection is below the hydraulic grade line at the upstream end of the proposed 90-inch RCP (i.e., where MTD No. 1000 Line B daylights at the northeast corner of the Project Site). Thus, Project implementation would not affect stormwater flows passing through the Project Site into the proposed 90-inch RCP or the upstream pipe network. The Project's proposed storm drain system would be reviewed and approved by LACDPW as part of the Project's Drainage Concept Review and by the City of Industry during its review of the Project's final storm drain plans. All necessary permits would be obtained prior to construction, and the proposed storm drain system would ultimately be transferred to Los Angeles County for ongoing maintenance. As a result, the Project would result in a less than significant impact with regard to drainage patterns and stormwater drainage design.

¹⁸ *Time of concentration is a concept used in hydrology to measure the time needed for runoff to flow from the most remote point in the watershed to the watershed outlet (i.e., the proposed 90-inch storm drain or Gale Avenue).*

e. Cumulative Impacts

As identified in Chapter 3.0, General Description of Environmental Setting, of this Draft EIR, there are three related projects within the Project vicinity. These projects could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff, resulting in cumulative impacts to hydrology and water quality. However, as with the Project, related projects would be required to capture and manage initial runoff with approved BMPs pursuant to the County LID Ordinance.

Further, the related projects would be subject to State NPDES permit requirements for both construction and operation. Each project greater than one acre in size would be required to have SWPPPs and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the LACDPW and City of Industry reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity are available. Thus, regulatory measures would avoid significant impacts on drainage/flooding conditions and the quality of water reaching the public drainage system. Cumulative impacts to hydrology and water quality would be less than significant.

4. MITIGATION MEASURES

The Project would be subject to the NPDES requirements described above, including preparation of and compliance with a SWPPP and County LID requirements. Compliance with these requirements, as implemented through the Project's proposed drainage system, which would be reviewed for regulatory compliance, would ensure that all impacts to hydrology and water quality are reduced to less-than-significant levels. No further mitigation is required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts to hydrology and water quality would be less than significant. No mitigation measures are required.

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4.H LAND USE AND PLANNING

1. INTRODUCTION

Development on the Project Site is guided by the policies and regulations of regional and local plans, as well as by the Los Angeles County (County) Zoning Ordinance (Title 22 of the Los Angeles County Code [LACC]), and City of Industry Zoning Code (Title 17 of the City of Industry Municipal Code [CIMC]). The provisions set forth in these plans and regulations have been adopted to promote orderly land use development and to eliminate or reduce potential land use conflicts from development. This section provides an overview of land use and planning policies and analyzes the potential impacts of the Project with regard to consistency with applicable land use regulations and compatibility of the Project with the surrounding uses in the area. Information in this section is based on the adopted County General Plan (1980),¹ LACC, and Southern California Association of Governments (SCAG's) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Chapter 6.0, Other CEQA Considerations, of this Draft EIR addresses issues pertaining to Project-related growth inducement. Land Use regulations pertaining to parking requirements are addressed in Section 4.K, Transportation and Parking, of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Project Site

The 14.85-acre Project Site is located at 18800 Gale Avenue in the extreme northern portion of the unincorporated County community of Rowland Heights. The Project Site is bounded by the shared Union Pacific Railroad Los Angeles Subdivision tracks/Metrolink Riverside Line (UPRR/Metrolink) tracks to the north, the Rowland Heights Plaza Shopping Center to the east, Gale Avenue to the south, and the Concourse Business Park to the west. The jurisdictional border between the unincorporated County and the City of Industry wraps around the Project Site to the north and west. The majority of the Project Site, 14.06 acres, is located within unincorporated Los Angeles County; the northernmost 0.79 acres, which represents a vacated (c.1983) segment of Railroad Street south of the UPRR/Metrolink tracks, is located within the City of Industry.

The Project Site was used for agricultural cultivation until the mid-1990s and is currently developed with a temporary north-south detour road that crosses the Site between Railroad Street and Gale Avenue, construction access road and construction staging area, and temporary surface parking established by the Alameda Corridor-East Construction Authority (ACE) in conjunction with the Nogales Street Grade Separation Project. No buildings exist on site. The temporary detour road is known as New Charlie Road and averages 40 feet in width, with a traffic signal at its intersection with Gale Avenue. Temporary parking stalls were also created on and adjacent to the Project Site to the east to replace Rowland Heights Plaza Shopping Center parking displaced by the Nogales Street Grade Separation Project construction. A

¹ Per direction from the County Department of Regional Planning, because the Project Application and EIR Notice of Preparation (NOP) were both processed prior to the planned adoption of the 2035 General Plan, the Project is subject to review under the 1980 General Plan. On March 24, 2015, the County Board of Supervisors voted to support adoption of the 2035 General Plan; however, no further action has been taken.

construction access road and construction staging area were constructed in the southeast corner of the Project Site. The ACE improvements in conjunction with the Nogales Street Grade Separation Project will be in place for a projected three-year duration, which is anticipated to end before Project construction commences.

A partially channelized storm drain extends from near the Project Site's northeast corner, where it receives upstream flows from the County's 90-inch underground storm drain, to its northwest corner, where it discharges into the City of Industry's 94-inch underground storm drain. Portions of the storm drain currently support willows and other riparian and upland vegetation, although it is periodically cleared to maintain storm flow capacity.

(2) Surrounding Uses

The Project Site is located within a concentration of light industrial and commercial uses centered on Nogales Street near its interchange with the Pomona Freeway (SR-60). This area is part of an approximately 14-mile-long corridor of predominantly industrial land uses within the City of Industry and unincorporated Los Angeles County along SR-60. The Project Site fronts Gale Avenue on the south; a Best Western Plus Executive Inn hotel is located directly across Gale Avenue, and Mandarin Plaza Shopping Center is located to the southeast. On the east, the Project Site is bordered by the Rowland Heights Plaza Shopping Center. The shopping center's western driveway, accessed from Gale Avenue and abutting the Project Site's eastern boundary, provides access to its loading dock and parking to the rear (north) of the 99 Ranch Market. Project uses in the immediate Project vicinity are depicted in **Figure 4.H-1, Aerial Photograph of the Project Site and Surrounding Land Uses.**

On the north, the Project Site is bordered by the UPRR/MetroLink right-of-way. Railroad Street and Nogales Industrial Parks are located north of the tracks. Land uses north of the Project Site are located within the City of Industry.

On the west, within the City of Industry, the Project Site is bordered by The Concourse Business Park and beyond that, the Four Seasons Shopping Center and additional wholesale commercial and manufacturing, storage, and distribution businesses.

The nearest residential uses are south of SR-60, approximately 300 feet from the Project Site's southern boundary. These uses include the Rowland Heights Mobile Estates mobile home park and predominantly single-family residential neighborhoods, all accessed from Colima Road.

(3) Community of Rowland Heights

The Project Site is located in the northern portion of the unincorporated County community of Rowland Heights. Rowland Heights encompasses approximately 13.1 square miles in the eastern San Gabriel Valley, extending from the City of Industry on the north to the Los Angeles/Orange County border on the south, and from the City of Diamond Bar and Orange Freeway (SR-57) on the east to the unincorporated community of Hacienda Heights on the west. Rowland Heights predominantly is a low-density residential community, with light industry and commercial development along SR-60 between the Nogales Street and Fairway Drive



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freeway interchanges and additional commercial development concentrated along Colima Road south of SR-60. The Project Site is located within the small cluster of light industrial and commercial uses centered on Nogales Street near its interchange with SR-60.

(4) Existing Planning and Zoning

Land uses in the Rowland Heights community are guided by the Rowland Heights Community Plan. The Project Site's land use classification is Major Industrial per the County's General Plan Land Use Policy Map and Industrial per the Rowland Heights Community Plan Land Use Map. These categories allow manufacturing, warehousing, and heavy commercial uses. Land uses to the east are designated Industrial by the County; land uses to the north and west, within the City of Industry, are designated Industrial and Commercial or Commercial/Industrial overlay, respectively. Land uses on the south side of Gale Avenue are designated Commercial and Industrial by the County.

The zoning for the portion of the Project Site within unincorporated Los Angeles County is M-1.5-BE, where "M-1.5" denotes Restricted Heavy Manufacturing, which permits a broad range of industrial and commercial uses, including most commercial uses permitted in the C3 Unlimited Commercial zone, but prohibits (among other uses) heavy manufacturing, residential uses, and hotels or motels (considered transitory residential uses).² The "BE" designation denotes Billboard Exclusion, a zoning designation established to ensure that commercial and industrial properties remain free from outdoor advertising where such signs are deemed to represent hazards to pedestrians and motorists or to detract from the visual appearance or economic base of an area.³

The Project Site is also subject to the requirements of the Rowland Heights Community Standards District (CSD), a special district with boundaries corresponding with the Rowland Heights Community Plan Area.⁴ The CSD was established to ensure compatibility of new development with adjacent residential uses, if any, and to impose development standards and review protocols to ensure that commercial development, associated signage, landscaping, and setbacks are appropriate for the community. For commercial and industrial land uses, specific development standards govern the maximum permitted lot coverage; front and side yard building setbacks; and landscaping requirements. In accordance with those standards, the Project Site is subject to various requirements, including a 40 percent lot coverage maximum and a minimum 15-foot landscaped setback from the property line along Gale Avenue (zero side/rear yard setback required adjacent to commercially zoned property). The CSD also governs signage types, dimensions, design, and location; a sign program is required for commercial centers of three or more businesses.⁵ The zoning designations of the Project Site and immediate vicinity and boundary of the Rowland Heights CSD are depicted in **Figure 4.H-2**, *Project Vicinity Zoning Designations*.

² Los Angeles County Code, Title 22, Planning and Zoning Code, Chapter 22.32.100 et seq.

³ Los Angeles County Code, Title 22, Planning and Zoning Code, Chapter 22.12.030(C) and Chapter 22.40, Part 3, Billboard Exclusion Zone

⁴ Rowland Heights Community Standards District (CSD), adopted 1981 and amended 2004 (Los Angeles County Code, Title 22, Planning and Zoning Code, Chapter 22.44, Part 2, Section 22.44.132, et seq.)

⁵ CSD, Section D.2.a.v (applies to M-1.5 per Section D.5)

The northernmost 0.79 acres of the Project Site (Northern Parcel) is located in the City of Industry, and is designated on the City's General Plan Land Use Map as Employment,⁶ for which allowable uses include a "variety of business and employment uses" including industrial, manufacturing assembly, warehousing, distribution, supporting offices and those commercial uses permitted under the Zoning Code, as well as parking.⁷ The corresponding zoning designation on the City's Zoning Map⁸ is Industrial (I) (still listed in the City's Zoning Code with the prior Industrial designation "M"),⁹ which permits a broad range of commercial and industrial uses, including manufacturing. Special industrial development standards are applicable to some permitted uses and address parking and loading, landscaping, and the siting and design of fences and walls, outdoor lighting, and trash enclosures. The land uses to the north and west of the Project Site, also within the City of Industry, are also designated on the City's General Plan Land Use Map as Employment and, for the parcels fronting on Gale Avenue, Commercial.

Land uses to the east of the Project Site are within the unincorporated County. The adjacent parcel on the east is designated Industrial on the Rowland Heights Community Plan Land Use Map; land uses on the south side of Gale Avenue are designated Commercial and Industrial.

The Project Site spans two County supervisorial districts; the parcel in the County is located within the Fourth Supervisorial District (Hon. Don Knabe), and the Northern Parcel is located within the City of Industry and First Supervisorial District (Hon. Hilda Solis).

b. Regulatory Framework Summary

Following is a discussion of the regulatory plans and policies and ordinances that apply to development at the Project Site. Specific provisions of those documents that pertain to the Project are listed in the Impact Analysis section below and evaluated for consistency with the Project.

(1) State

(a) Senate Bill 375

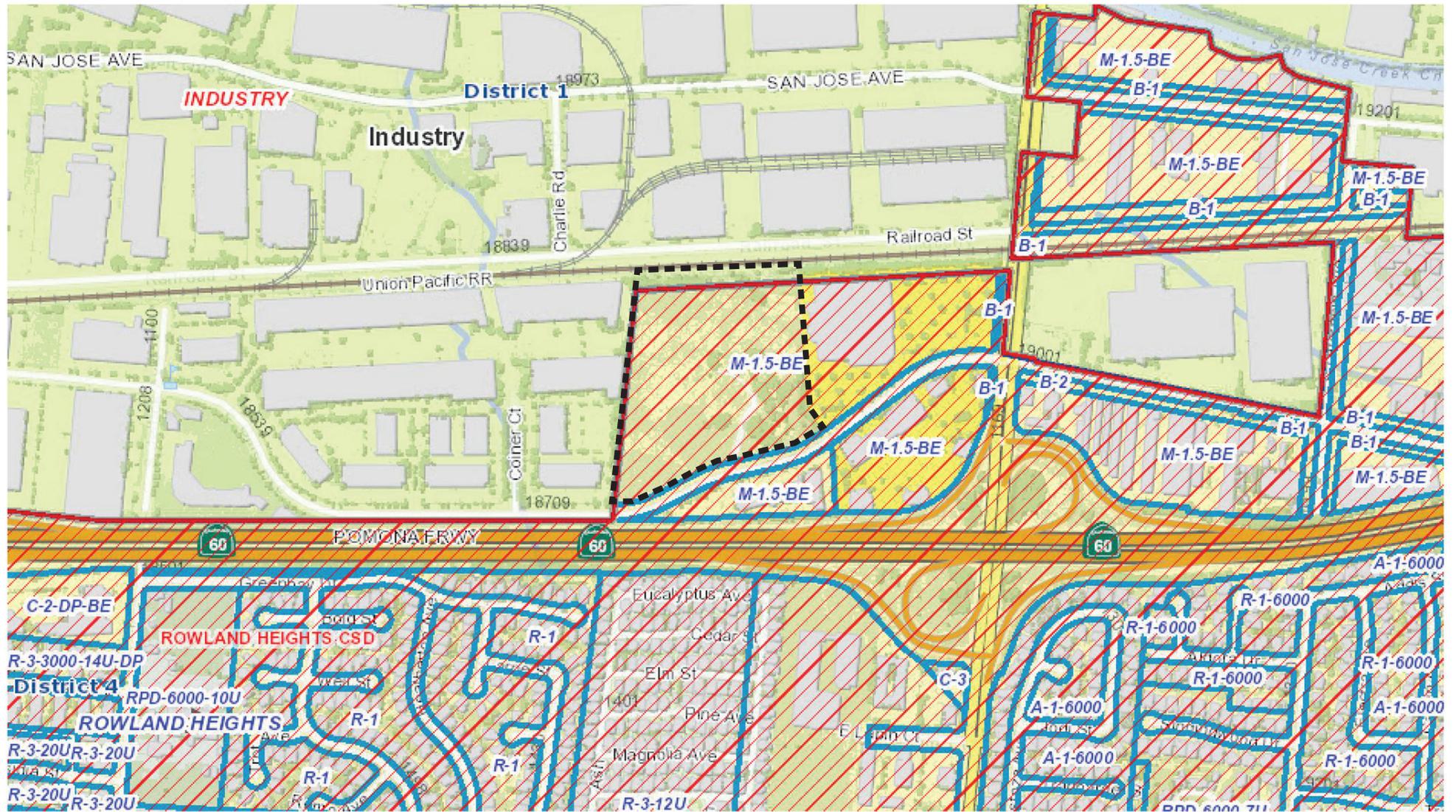
Senate Bill 375 (SB 375), adopted in September 30, 2008, requires the Regional Transportation Plan (RTP) prepared by SCAG to include a Sustainable Communities Strategy (SCS). In adopting SB 375, the California Legislature found that improved coordination between land use planning and transportation planning is needed in order to achieve adopted greenhouse gas (GHG) emissions reduction targets. The RTP and SCS are discussed below.

⁶ City of Industry, General Plan Land Use Map, adopted June 6, 2104; <http://www.cityofindustry.org/uploads/plans/Industry%20General%20Plan%20Land%20Use%20Map.pdf>. Accessed September 17, 2015.

⁷ City of Industry, General Plan, adopted June 2014; <http://www.cityofindustry.org/?p=city-hall&s=general-plan>. Accessed September 17, 2015.

⁸ City of Industry, Zoning Map, December 16, 2014; <file:///C:/Users/A.Doehne/Downloads/ZoningUpdate141216.pdf>. Accessed September 17, 2015.

⁹ City of Industry Zoning Code, Chapter 17.16.010



City and Community (Neighborhood)

-  INCORPORATED CITY
-  UNINCORPORATED AREA

 Community Standards District (CSD)

 Land Use Policy – Comm. / Area Plan Largest

 Land Use Policy – General Plan Largest

 Supervisorial District

 1000M

 Zoning (Boundary)

 Project Boundary

Project Vicinity Zoning Designations

Rowland Heights Plaza and Hotel Project

Source: Los Angeles County Department of Regional Planning, 2015.

FIGURE

4.H-2

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(2) Regional

(a) Southern California Association of Governments

SCAG is the designated regional planning agency for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. SCAG is a joint powers agency with responsibilities pertaining to regional issues. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development.

As part of its planning obligations, SCAG prepares the Regional Comprehensive Plans (RCP); the most recent was prepared in 2008. The 2008 RCP was accepted by SCAG for use as an advisory document that may be voluntarily used by local jurisdictions when developing local plans and addressing local issues of regional significance. The RCP addresses issues related to future growth and provides a means for assessing the potential impact of individual development projects within a regional context. Local governments are asked to consider the RCP's recommendations in the preparation of General Plan updates, municipal code amendments, design guidelines, incentive programs, and other actions. The RCP is also closely linked to, and serves as a basis for the preparation of SCAG's RTP and the Compass Blueprint Growth Visioning (2% Strategy) program.

(b) SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy

In April 2012, the SCAG Regional Council adopted the 2012 RTP/SCS. The 2012 RTP/SCS presents the transportation vision for the region through the year 2035 and provides a long-term investment framework for addressing the region's transportation and related challenges. Also, the 2012 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning and the provision of services by other regional agencies. The SCS portion presents an overall land use concept for the region with increasing focus on densification of urban areas and development around transit stations and increased focus on use of transit and active transportation. The RTP includes goals and policies that seek to:

- align the plan investments and policies with improving regional economic development and competitiveness;
- maximize mobility and accessibility;
- ensure travel safety and reliability;
- preserve and ensure a regional transportation system;
- maximize productivity of the transportation system;
- protect the environment and health of residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking);
- actively encourage and create incentives for energy efficiency, where possible; encourage land use and growth patterns that facilitate transit and non-motorized transportation.; and
- maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.

Policies included in the 2012-2035 RTP/SCS that are applicable to the Project (as well as an analysis of project consistency) are identified in the Impact Analysis below.

(c) Compass Growth Vision Report

SCAG also engages in the Compass Growth Visioning effort that addresses the regional development pattern so as to accommodate future development and provide land use patterns that improve mobility, reduce vehicle miles traveled, and support the goals and policies established in the RTP. The SCAG Compass Growth Vision Report predates the SCS, but many of the planning principles continue to be relevant as the SCS was built upon this foundation. The Growth Vision is driven by four key principles: mobility – getting where we want to go; livability - creating positive communities; prosperity - long-term health for the region; and sustainability - preserving natural surroundings.

To realize these principles on the ground, the Growth Vision encourages:

- Focusing growth in existing and emerging centers and along major transportation corridors;
- Creating significant areas of mixed-use development and walkable communities;
- Targeting growth around existing and planned transit stations; and
- Preserving existing open space and stable residential areas.

As part of the visioning effort, the Compass Blueprint 2% Strategy provides guidance for how and where SCAG can implement the Growth Vision for Southern California's future. It calls for modest changes to current land use and transportation trends on only 2% of the land area of the region. Directing the changes to the selected 2% of the land identified produces the greatest policy achievement for the least land affected. The Growth Visioning effort encourages clustering/densification of population activity in proximity to certain transportation facilities. Policies included in the Compass Growth Vision Report that are applicable to the Project (as well as an analysis of project consistency) are identified in the Impact Analysis below.

(d) Congestion Management Plan (CMP)

The Los Angeles County Metropolitan Transportation Authority (Metro) administers the CMP, which is a State-mandated program designed to provide comprehensive long-range traffic planning on a regional basis. On October 28, 2010, the Metro Board adopted the 2010 CMP for Los Angeles County. The 2010 CMP summarizes the results of 18 years of CMP highway and transit monitoring and 15 years of monitoring local growth. The primary goal of the CMP is to reduce traffic congestion in order to enhance the economic vitality and quality of life for affected communities. CMP guidelines specify that those freeway segments to which a project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of designated CMP roadway intersections to which a project could add 50 or more trips during either peak hour. The Project's consistency with the CMP is discussed in Section 4.K, Transportation and Parking, of this Draft EIR.

(3) County

(a) Adopted Los Angeles County General Plan

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. The current Los Angeles County General Plan was approved and adopted by the Board in November 1980.

The adopted 1980 Los Angeles County General Plan (adopted 1980 General Plan) is being comprehensively updated to provide the policy framework for growth within the unincorporated County through the year 2035.¹⁰ The County Board of Supervisors voted to approve the draft General Plan update on March 24, 2015,¹¹ but it still awaits adoption, which is currently anticipated in late summer or fall of 2015. The Draft General Plan permits those projects for which application filings have been completed to select the General Plan under which it is evaluated. The Project application filing was completed in May 2014, and the Project Applicant has elected to be determined consistent with the adopted 1980 General Plan.

The General Plan serves as a document to provide decision-makers with a policy framework to guide specific, incremental decisions to achieve the Plan's stated goals and objectives. The chapters and elements have three major roles:¹²

1. To provide an overall set of goals and policies to guide countywide activities so that governmental decisions at all levels move in the same direction;
2. To provide policy parameters to integrate more specific planning efforts in order to ensure a compatible and effective regional approach; and
3. To provide effective planning for specific functions that can be best addressed at the countywide level.

According to the General Plan, each of the countywide chapters and elements has been developed with one or more of the above roles in mind and fulfills a necessary role that transcends and supplements the local plans.¹³ General Plan Elements, which have been updated over the years, address land use, housing, transportation, water and waste management, safety, seismic safety, noise, scenic highways, bikeways and recreation.

The goals and policies of the adopted 1980 General Plan that are applicable to the Project (as well as an analysis of project consistency) are listed in the Impact Analysis below.

As discussed above, the County's General Plan designates the Project Site as Major Industrial. According to the County's General Plan Land Use Element, major industrial uses include manufacturing of all types, mineral extraction sites, refineries, warehousing and storage, and product research and development. The intent of this land use category is to assure that sufficient land is allocated for a wide range of industry and industry-related activities serving both the domestic and export markets and providing jobs for a large portion of the resident labor force. As discussed below, the Project Site has a corresponding zoning designation M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion), which permits a broad range of industrial and commercial uses, including most commercial uses permitted in the C3 (Unlimited

¹⁰ Los Angeles County Department of Regional Planning, *Los Angeles County General Plan*, <http://planning.lacounty.gov/generalplan/>. Accessed January 5, 2015.

¹¹ Los Angeles County Department of Regional Planning: *General Plan 2035*, <http://planning.lacounty.gov/generalplan>. Accessed July 1, 2015.

¹² Los Angeles County Department of Regional Planning, *County of Los Angeles General Plan, 1980*, page 4.

¹³ *Ibid.*

Commercial) zone, but prohibits (among other uses) heavy manufacturing, residential uses, and hotels or motels (considered transitory residential uses).

(b) Rowland Heights Community Plan

The Project Site is within the Rowland Heights Community Plan Area, one of 19 adopted local plans that collectively comprise the Land Use Element of the General Plan and provide land use policy guidance at a finer scale than the regionally focused Countywide Elements. The Project Site's land use classification is Major Industrial per the County's General Plan Land Use Policy Map and Industrial per the Rowland Heights Community Plan Land Use Map, which denotes land designated for manufacturing, warehousing, and heavy commercial uses. The goals and policies that are applicable to the Project (as well as an analysis of project consistency) are listed in the Impact Analysis below.

(c) Los Angeles County Code (LACC) Title 22 (Planning and Zoning Code)

Title 22 (Planning and Zoning Code) of the LACC sets forth zoning designations and other regulations pertinent to land use. Title 22.12 establishes individual zoning designations, area requirements, density of land occupancy, and the necessary, proper and comprehensive groupings and arrangements of the various industries, businesses and population of the County in policy established by the Land Use Element of the General Plan. The zoning designation for the County portion of the Project Site is M-1.5-BE; permitted land uses and development standards are discussed in detail above.

The Project Applicant is requesting a Zone Change from M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion) to C-3-(DP) (Unlimited Commercial-Development Program) for Parcels 2 and 3 to allow for the development of the proposed hotel uses (as noted, hotels are prohibited in the M-1.5 zone). The C3 zone permits commercial uses, including those permitted in the C-2 zone (which allows for hotels and related services); subject to the approval of a conditional use permit (CUP). No minimum required area is set forth on the C-3 zone, and the maximum development permitted is 13 times the buildable area. No setbacks are established for the C-3 zone.

(d) Rowland Heights Community Standards District

The Project Site is also subject to the requirements of the CSD, a special district that coincides with the Rowland Heights Community Plan Area and codified in LACC Section 22.44.132.¹⁴ The development standards for commercial and industrial land uses in the Rowland Heights CSD are discussed in detail below.

(4) City of Industry

(a) City of Industry General Plan

The City of Industry General Plan was approved by the City Council in June 2014. The General Plan represents the City of Industry's views of its future, and consists of the following five elements: (1) Land Use, (2) Circulation, (3) Resource Management, (4) Safety, and (5) Housing. The General Plan Land Use Element describes how land is used and regulated in the City and also addresses future buildout projections and compatibility issues. To achieve this objective, the Land Use Element established a planned pattern of land

¹⁴ *Rowland Heights Community Standards District, adopted 1981 and amended 2004 (Los Angeles County Code, Title 22, Planning and Zoning Code, Chapter 22.44, Part 2, Section 22.44.132, et seq.)*

use in the City of Industry and its sphere of influence. The portion of the Project Site in the City of Industry is designated on the City of Industry General Plan Land Use Map as Employment.

(b) City of Industry Zoning Code

The City's Zoning Code regulates the size and height of buildings as well as specific types of uses permitted in the various zoning districts. Each land use designation indicates a maximum level of development intensity, as measured by the proposed floor-area ratio (FAR), the ratio of net building floor area to buildable lot area.

The portion of the Project Site within the City of Industry is zoned Industrial (I), which permits a broad range of commercial and industrial uses, including manufacturing. Special industrial development standards are applicable to some permitted uses and address parking and loading, landscaping, and the siting and design of fences and walls, outdoor lighting, and trash enclosures.¹⁵

3. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of potential land use impacts in this Draft EIR considers consistency of the Project with adopted plans and policies that regulate land use on the Project Site. The determination of consistency with applicable land use policies and ordinances is based upon a review of the regulatory planning documents identified above. State *CEQA Guidelines* Section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision-makers should address. Evaluations are made as to whether a project would further plan provisions or actively obstruct their implementation. The intention of the evaluation of consistency with regulatory plans is to determine if noncompliance would result in a significant physical impact. Accordingly, the criterion for determining significance with respect to a land use plan emphasizes substantive conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that a mere inconsistency with a plan, policy, or regulation does not necessarily equate to a significant impact on the environment.

The Project Applicant is requesting a Development Program CUP for hotel uses on Parcels 2 and 3. Per LACC Section 22.56.040, a CUP application must demonstrate that the requested use will not have a detrimental effect on surrounding land uses. Thus, in approving a Development Program CUP, the County must, among other findings, determine that the proposed development is compatible with its surrounding uses. The intent of the compatibility analysis is to determine whether the Project would be compatible in relation to use, size, intensity, density, scale, and other physical and operational factors with other land uses in the Project vicinity. The analysis addresses general land use relationships and urban form based on a comparison of land use relationships in the Project area under existing conditions to the conditions that which would occur with Project implementation.

¹⁵ *City of Industry Zoning Code, Chapter 17.16.026*

b. Thresholds of Significance

The potential for land use impacts is based on thresholds derived from Los Angeles County Department of Regional Planning Initial Study Checklist screening questions, which are based in part on Appendix G of the State *CEQA Guidelines*. These questions are as follows:

11. LAND USE AND PLANNING. Would the project:

- a. Physically divide an established community?
- b. Be inconsistent with the applicable County plans for the subject property including, but not limited to, the General Plan, specific plans, local coastal plans, area plans, and community/neighborhood plans?
- c. Be inconsistent with the County zoning ordinance as applicable to the subject property?
- d. Conflict with Hillside Management criteria, Significant Ecological Areas conformance criteria, or other applicable land use criteria?

The Initial Study determined that the Project would have no impact or less than significant impacts with respect to a) physical division of an established community and d) conflict with Hillside Management criteria, Significant Ecological Areas conformance criteria, or other applicable land use criteria. These environmental topics are not evaluated in this EIR.

Based on these factors, the Project would have a potentially significant land use impact if it would:

LU-1 Be inconsistent with the applicable County plans for the Project Site including, but not limited to, the General Plan, specific plans, local coastal plans, area plans, and community/neighborhood plans.

LU-2 Be inconsistent with the County zoning ordinance as applicable to the Project Site.

c. Project Characteristics or Design Features

(1) Proposed Parcels

The majority of the Project Site, the southerly 14.06 acres, is within the unincorporated County; the remaining 0.79 acres lie within the City of Industry. The Project would subdivide the portion of the Project Site in the County into three parcels (i.e., Parcels 1, 2, and 3); the existing 0.79-acre Parcel in the City of Industry would be retained with no change to the existing parcel boundaries. Refer to Figure 2-4, *Conceptual Site Plan*, for a visual depiction of the proposed parcels.

(a) Parcel 1, Commercial Center

Parcel 1 (8.75 gross acres), the Commercial Center, is adjacent to the Rowland Heights Plaza Shopping Center to the east and would be developed with commercial units to accommodate retail, restaurant, and office uses. Four buildings would be arrayed around the perimeter of the parcel, surrounding a central surface parking lot and open space amenities. Storefronts in Building Nos. 1 and 2 would face east, toward

the interior of the Parcel 1 Commercial Center, with enhanced wall treatments facing Parcels 2 and 3 across the shared primary entrance driveway to the Project Site.

Building Nos. 1 and 4, along the Gale Avenue frontage of Parcel 1, would be two stories and approximately 35 feet in height above adjacent grade (to the roof parapet). Building Nos. 2 and 3, in the northern portion of Parcel 1 would be one story and approximately 24 to 27 feet in height above adjacent grade (to the roof parapet), with rooftop projections or towers up approximately 35 feet in height above adjacent grade. Developed square footage on Parcel 1 would total approximately 129,926 gross square feet (gsf) with a FAR of 0.365:1. Lot coverage would be approximately 26.6 percent.

To enhance the pedestrian environment and in response to community input, proposed open space and landscape amenities on the Parcel 1 would include a centrally located gathering common area that includes seating, landscaping, and a historically themed common area. The central east-west drive aisle within Parcel 1 and the joint Hotel A/Hotel B entry plaza would feature enhanced paving and landscaping. Parcel 1 would also be developed with bench seating and landscaped planters. Traffic islands within the surface parking lots and the planter strips lining internal drive aisles would be planted with trees, shrubs, and groundcover using a cohesive plant palette.

(b) Parcel 2, Hotel A

Parcel 2 (3.38 gross acres), located in the southwest portion of the County portion of the Project Site adjacent to Gale Avenue, would be developed with a full-service hotel (Hotel A). Hotel A is generally intended for business travelers and families, totaling 275 guest rooms and suites. Amenities would include a restaurant, bar, ball-rooms/banquet facility, meeting rooms, business center, and a fitness center, as well as a pool and lounge area. The hotel restaurant hours of operation would be from 6:00 A.M. to 10:00 P.M., while the bar would operate from 12:00 P.M. to 12:00 A.M. Banquet and meeting room hours of operation would extend to 12:00 A.M. Hotel A would be six stories and approximately 72 feet in height above grade (to top of parapet), with rooftop mechanical equipment up to 80 feet above grade. Developed square footage on Parcel 2 would total approximately 189,950 gsf, with lot coverage of approximately 36.62 percent.

(c) Parcel 3, Hotel B

Parcel 3 (1.93 gross acres), located in the northwest portion of the Project Site, would be developed with an extended-stay hotel (Hotel B). Hotel B is generally intended for business travelers, totaling 202 guest rooms and suites. Rooms would incorporate fully equipped kitchenettes, and common area amenities. These amenities would include a breakfast lounge, meeting rooms with hours of operation from 9:00 A.M. to 10:00 P.M., and fitness center. The extended-stay hotel would be six stories high and approximately 72 feet in height above grade (to top of parapet), with rooftop mechanical equipment extending up to 80 feet above grade. Developed square footage on Parcel 3 would total approximately 130,930 gsf, with lot coverage of approximately 37.19 percent.

(d) City of Industry Parcel

The 0.79-acre parcel in the City of Industry would accommodate surface parking stalls and a drive aisle to allow private and emergency response vehicle access between Parcel 1 and Parcels 2 and 3. No buildings or

other improvements are proposed for this parcel, apart from necessary storm drain, water, and wastewater infrastructure.

(2) Project Zone Change and Conditional Use Permits (CUPs)

As discussed in detail in Chapter 2.0, Project Description, of this Draft EIR, the Project Applicant is requesting a Zone Change from M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion) to C-3-(DP) (Unlimited Commercial-Development Program) for Parcels 2 and 3; this is to accommodate the proposed hotels. The Project Applicant is also requesting CUPs to authorize:

- 1) a Development Program associated with a proposed Zone Change on Parcels 2 and 3 for hotel uses, including authorization to allow the hotel buildings to exceed a height of 45 feet above grade (a maximum height of 80 feet is being sought for Hotel A on Parcel 2 and a maximum height of 72'-4" is being sought for Hotel B on Parcel 3);
- 2) a new commercial center containing more than three business establishments as required by the Rowland Heights Community Plan;
- 3) an on-site grading project involving in excess of 100,000 cubic yards of grading (192,000 total cubic yards of soil with 48,301 cubic yards of export anticipated); and
- 4) the sale of a full line of alcoholic beverages for on-site consumption in conjunction with normal operations of the two proposed hotels.

Additional approvals sought by the Project Applicant include: 1) a Vesting Tentative Parcel Map to create three parcels and 155 units in conjunction with the proposed retail shopping center and 2) a Parking Permit to authorize reduced on-site parking due to shared use of parking facilities within the development, to allow 75 off-site parking spaces on a contiguous 0.79-acre parcel in the City of Industry municipal boundary, and to authorize a valet-managed parking program for the proposed hotels.

(3) Project Sign Program

The Project Applicant is requesting approval of a Sign Program for the proposed development. Project signage would include building identification and wayfinding signage. A monument sign identifying the hotels and a pylon sign for the commercial uses would be located at the primary entrance driveway on Gale Avenue. All signage would be intended to serve the on-site uses and activity; no off-site signage (e.g., billboard) is proposed. The Project Sign Program would be reviewed by the Regional Planning Department (Director) to ensure the Program's compatibility with the CSD and other applicable requirements.

(4) Sustainability Features

The Project would be designed to comply with the County's Green Building Program, which is based on the 2010 California Green Building Standards Code (CALGreen). See the discussion in Section 4.F, Greenhouse Gas Emissions, regarding Project Design Features that implement CALGreen requirements.

d. Project Impacts

(1) Consistency of Project with Applicable Plans, Policies, and Zoning Regulations

Threshold LU-1: A significant impact would occur if the Project is inconsistent with the applicable County plans for the Project Site including, but not limited to, the General Plan, specific plans, local coastal plans, area plans, and community/neighborhood plans.

Impact Statement LU-1: *The Project would be substantially consistent with adopted regulatory policies in force at the time of submittal of the Project application, as well as guidance documents and regulations governing allowable land uses on the Project Site. Land use impacts with respect to applicable plans would be less than significant.*

Project consistency with applicable County and other regional regulations and policies are addressed below, and include the County's General Plan General Goals and Policies Chapter, individual General Plan Elements, the Rowland Heights Community Plan, and the Rowland Heights CSD. The consistency analysis for applicable regional measures addresses policies/goals and principles listed in SCAG's 2012 RTP and the Compass Blue Print Growth Vision. Because the only improvement proposed on the 0.79-acre Northern Parcel located in the City of Industry is a surface parking lot, a comprehensive comparison of the Project to City of Industry planning documents is not warranted.

Two other plans that address the distribution of land use in the region and are linked with the SCAG Plans are addressed in other sections of this Draft EIR. Project consistency with the applicable Air Quality Management Plan is analyzed in Section 4.B, Air Quality, of this Draft EIR, and consistency with the CMP is addressed in Section 4.K, Transportation and Parking, of this Draft EIR.

(a) SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2012 – 2035 RTP/SCS provides a guiding vision for development in the region and a basis for planning infrastructure improvements. **Table 4.H-1, Comparison of the Project to Applicable Policies of the SCAG 2012-2035 RTP/SCS**, evaluates the consistency of the Project with policies of SCAG's RTP/SCS. As discussed in Table 4.H-1, the Project would be consistent with applicable RTP goals and policies. The Project would encourage economic development by providing a mix of commercial uses on an underdeveloped Project Site that is well served by an existing transportation network, including public transportation options to provide an alternative to private automobiles. Further, the Project would maintain the pedestrian environment along Gale Avenue and improve pedestrian accessibility across the Project Site. The Project would implement design features and mitigation measures to reduce air quality impacts, including the incorporation of energy-saving features (see Sections 4.B, Air Quality, and 4.F, Greenhouse Gas Emissions, of this Draft EIR). Active transportation, including pedestrian connections and close proximity to transit options, would encourage alternative transit modes and improve air quality. The Project would support energy efficiency by including design features and building regulations to reduce demand for energy resources. Based on the analysis presented in Table 4.H-1, the Project would be consistent with applicable RTP/SCS policies. No significant impacts with respect to RTP/SCS policies, many of which were adopted for the purpose of avoiding or mitigating an environmental effect, would occur.

Table 4.H-1

**Comparison of the Project to Applicable Policies
of the SCAG 2012-2035 RTP/SCS**

Goal	Analysis of Project Consistency
<p>Goal: Align the plan investments and polices with improving regional economic development and competitiveness.</p>	<p>Consistent: The Project would encourage jobs (i.e., short-term construction jobs and long-term employment associated with the proposed retail, office, and hotel uses on-site) on an underutilized site. This would allow increased intensity and density of uses and a broader mix of uses that would maximize use of the established transportation options in Project vicinity.</p>
<p>Goal: Maximize mobility and accessibility for all people and goods in the region.</p>	<p>Consistent: The Project would constitute infill commercial development near established transit corridors, allowing residents to find goods and services in their vicinity and use transit as an alternative to private vehicles. Primary Project access would be from Gale Avenue, which provides access to SR-60 via Nogales Street and Fullerton Road; the Nogales Street interchange is approximately one-half mile southeast of the Project Site. Foothill Transit Bus Lines 178 and 289 maintain stops along Nogales Street between Gale Avenue and Nogales Street, approximately 0.2 miles east of the Project Site. Regional rail service in the Project vicinity is provided by the Metrolink Riverside Route, which provides service between Union Station in Los Angeles and downtown Riverside. The Metrolink Industry Station is located approximately 2.7 miles northeast of the Project Site.</p>
<p>Goal: Ensure travel safety and reliability for all people and goods in the region.</p>	<p>Consistent: The Project is designed as an infill commercial project in proximity to a number of established transportation routes. Primary Project access would be from Gale Avenue. Regional freeway access and mass transit options are available in close proximity for guests and patrons of the Project Site. Further, the Project would incorporate urban design standards for commercial infill development along established transit corridors, as well as provide internal pedestrian walkways, in order to maintain a safe and comfortable pedestrian environment and buffering between uses.</p>
<p>Goal: Preserve and ensure a sustainable regional transportation system.</p>	<p>Consistent: The Project constitutes infill commercial development along established transit corridors. Primary Project access would be from Gale Avenue. Regional freeway access and transit options that provide an alternative to private vehicle travel are available within close proximity for guests and patrons of the Project Site.</p>
<p>Goal: Maximize the productivity of our transportation system.</p>	<p>Consistent: The Project constitutes an infill commercial Project along established transit corridors. Regional freeway access and transit options that provide an alternative to private vehicle travel are available within close proximity for patrons, guests, and employees of the Project Site.</p>

Table 4.H-1 (Continued)

**Comparison of the Project to Applicable Policies
of the SCAG 2012-2035 RTP/SCS**

Goal	Analysis of Project Consistency
<p>Goal: Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized) transportation, such as bicycling and walking.</p>	<p>Consistent: As discussed above, several transit options are available in the Project vicinity as an alternative to private vehicles. Further, the Project would maintain and improve the pedestrian environment along Gale Avenue by improving the existing sidewalk; providing a landscaped setback, providing dedicated pedestrian access to the Project Site, separate from the vehicular driveways; and providing short- and long-term bicycle parking and related amenities. The Project is also intended to support and enhance pedestrian mobility between the Project Site and the commercial uses to the east, south, and west along Gale Avenue.</p>
<p>Goal: Actively encourage and create incentives for energy efficiency, where possible.</p>	<p>Consistent: As discussed above, several transit options are available in the Project vicinity as an alternative to private vehicles. The Project would allow for nearby residents to find goods and services in their immediate vicinity, and would provide employment opportunities in an area with an ample housing supply.</p>
<p>Goal: Encourage land use and growth patterns that facilitate transit and non-motorized transportation.</p>	<p>Consistent: As discussed above, several transit options are available in the Project vicinity as an alternative to private vehicles. Further, the Project would maintain and improve the pedestrian environment along Gale Avenue by improving the existing sidewalk and providing a landscaped setback. The Project is also intended to support and enhance pedestrian mobility between the Project Site and the commercial uses to the east, south, and west along Gale Avenue.</p>

Source: PCR Services Corporation, 2015.

(b) Compass Growth Vision Report

Table 4.H-2, *Comparison of the Project to Applicable Policies of the Compass Growth Vision Report*, evaluates the consistency of the Project with policies of the Compass Growth Vision Report. As discussed in Table 4.H-2, the Project would be consistent with applicable policies of the Compass Growth Vision Report. The Project would improve mobility for all residents by providing an infill development along established transportation corridors, as well as in proximity to transit options and existing housing. Moreover, the Project would incorporate the design standards of the Rowland Heights CSD and provide pedestrian walkways and landscaped setbacks to provide a “people-scaled” project. Lastly, the Project would include sustainability features in accordance with the County’s Green Building Program to reduce energy consumption, reduce GHG emissions, and reduce pollution.

Table 4.H-2

**Comparison of the Project to Applicable Policies
of the Compass Growth Vision Report**

Policy/Goal	Analysis of Project Consistency
<p>Principle #1: Improve mobility for all residents.</p>	<p>Consistent: The Project is designed as an infill project within proximity to several established transportation routes. Primary Project access would be from Gale Avenue. Regional freeway access and mass transit options are available within close proximity for guests and patrons of the Project Site. Further, the Project would incorporate urban design standards for commercial infill development along established transit corridors, as well as provide internal pedestrian walkways, in order to maintain a safe and comfortable pedestrian environment and buffering between uses.</p>
<p>Policy: Locate new housing near existing jobs and new jobs near existing housing.</p>	<p>Consistent: The Project constitutes an infill development on an underutilized parcel within an urban, developed portion of unincorporated Los Angeles County. By developing a Site already well-served by existing transportation infrastructure and within proximity to existing housing, the Project would promote employment and economic growth while reducing vehicle miles traveled and reducing development pressure on the urban fringe. Further, by providing hotel opportunities within proximity to light and industrial uses, the Project would reduce vehicle miles travelers for business travelers. The Project would create employment opportunities in an area with ample housing supply.</p>
<p>Policy: Promote a variety of travel choices.</p>	<p>Consistent: As discussed above, the Project is designed as an infill project within proximity to several established transportation routes. Primary Project access would be from Gale Avenue. Regional freeway access and mass transit options are available within close proximity for guests and patrons of the Project Site. Further, the Project would incorporate urban design standards for commercial infill development along established transit corridors, as well as provide internal pedestrian walkways, in order to maintain a safe and comfortable pedestrian environment and buffering between uses.</p>
<p>Principle #2: Foster livability in all communities.</p>	<p>Consistent: The Project would constitute an infill commercial Project along established transit corridors that would allow for nearby residents to find goods and services in their immediate vicinity.</p>
<p>Policy: Promote infill development and redevelopment to revitalize existing communities.</p>	<p>Consistent. The Project consists of an infill project on an underutilized Project Site.</p>
<p>Policy: Promote developments that provide a mix of uses.</p>	<p>Consistent. The Project proposes a mix of commercial uses, including hotel, retail, commercial office, and restaurant uses.</p>
<p>Policy: Promote “people-scaled” pedestrian-friendly communities.</p>	<p>Consistent. The Project would maintain and improve the pedestrian environment along Gale Avenue by improving the existing sidewalk along the north side of the roadway and providing a landscaped setback. The Project is also intended to support and enhance pedestrian mobility between the Project Site and the commercial uses to the east, south, and west along Gale Avenue. The final building designs would also include visually attractive elements such as building articulations and distinguishable materials in accordance with Section 22.44.132(D)(2)(g) of the Rowland Heights CSD.</p>
<p>Policy: Ensure environmental</p>	<p>Consistent. The Project would provide a range of employment opportunities that</p>

Table 4.H-2 (Continued)

**Comparison of the Project to Applicable Policies
of the Compass Growth Vision Report**

Policy/Goal	Analysis of Project Consistency
justice regardless of race, ethnicity, or income class.	will adhere to all applicable federal, State, and local regulations prohibiting discrimination in employment.
Principle #4: Promote sustainability for future generations.	Consistent. The Project would constitute infill commercial development along established transit corridors that would allow for nearby residents to find goods and services in their immediate vicinity.
Policy: Develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste.	Consistent. The Project constitutes an infill development in an area well served by an existing transportation network, reducing development pressure on the urban fringe. By developing a site already well-served by existing transportation infrastructure and within proximity to existing housing, the Project would promote employment and economic growth while reducing vehicle miles traveled and reducing development pressure on the urban fringe. Further, by providing hotel opportunities within proximity to light and industrial uses, the Project would reduce vehicle miles traveled for business travelers. The Project would create employment opportunities in an area with ample housing supply.
Policy: Utilize “green” development techniques.	Consistent. As discussed above, the Project is required to meet the standards for LEED® Silver-level certification or the equivalent in accordance with the County’s Green Building Program. Some key Project features intended to contribute to energy efficiency include high-efficiency fixtures and appliances; the use of drought-tolerant and water-efficient landscaping; water conservation measures including installation of low-flow fixtures and smart irrigation controls; and of stormwater retention and treatment onsite.

Source: PCR Services Corporation, 2015.

(c) Los Angeles County General Plan – General Goals and Policies

Table 4.H-3, *Comparison of the Project to Applicable Policies of the County General Plan General Goals and Policies Chapter*, evaluates the consistency of the Project with policies of the adopted 1980 General Plan General Goals and Policies, demonstrates that the Project would be consistent with applicable goals and policies. The Project constitutes infill commercial development on an underutilized parcel and would maximize the efficient use of water, energy, and resources in the County.

Table 4.H-3

**Comparison of the Project to Applicable Policies
of the County General Plan General Goals and Policies Chapter**

Policy/Goal	Analysis of Project Consistency
Human Resources Development	
<p>Policy 1: Eradicate discrimination in housing, jobs and income, education, recreation, and other facets of living; and guarantee full and equal opportunity in order to promote individual and group development.</p>	<p>Consistent: The Project would provide a range of employment opportunities that would adhere to all applicable federal, State, and local regulations prohibiting discrimination in employment.</p>
Population Growth and Distribution	
<p>Policy 6: Accept and plan for a level and rate of population and economic growth consistent with improved quality and the availability of air, water and energy resources.</p>	<p>Consistent: The Project constitutes an infill development on an underutilized parcel within an urban, developed portion of unincorporated Los Angeles County. By developing a site already well served by existing transportation infrastructure and within proximity to existing housing, the Project would promote employment and economic growth while reducing vehicle miles traveled and reducing development pressure on the urban fringe. Further, by providing hotel opportunities within proximity to light and industrial uses, the Project would reduce vehicle miles travelers for business travelers. As discussed in Section 4.B, Air Quality, of this Draft EIR, the Project would result in potentially significant but mitigable construction-related impacts to air quality, but significant and unavoidable operational impacts related to trip generation for the proposed uses; vehicle trips would already be reduced to the maximum extent feasible by the collocation of the hotels and commercial uses, and vehicle trip reductions due to internal capture as a result. As discussed in Sections 4.F, Greenhouse Gas Emissions, 4.L.2, Water Supply, and Chapter 6.0, Other CEQA Considerations (subsection E, Energy), the Project would result in a less than significant impact with respect to water and energy resources. Lastly, as discussed in Section 4.G, Hydrology and Water Quality, of this Draft EIR, the Project would result in a less than significant impact to water quality with the implementation of structural BMPs in accordance with the County’s LID Ordinance, including media filters, underground detention basins, and bio-filtration devices.</p>

Table 4.H-3 (Continued)

**Comparison of the Project to Applicable Policies
of the County General Plan General Goals and Policies Chapter**

Policy/Goal	Analysis of Project Consistency
<p>Policy 7: Promote a reversal of the trend toward population losses in older urban areas.</p>	<p>Consistent: The Project constitutes an infill development on an underutilized parcel that would provide opportunities for employment and economic growth within an urbanized portion of unincorporated Los Angeles County. The Project would create employment opportunities in an area with ample housing supply, thus reducing development pressure on the urban fringe.</p>
<p>Policy 8: Promote a distribution of population consistent with the service system capacity, resource availability, environmental limitations, and accessibility.</p>	<p>Consistent: The Project constitutes of infill development on an underutilized parcel currently served by existing transportation and utility infrastructure that would allow for nearby residents to find goods and services in their immediate vicinity. The Project would create employment opportunities in an area with ample housing supply. As discussed in Chapter 6.0, Other CEQA Considerations, of this Draft EIR, the Project would not result in a significant irreversible use of natural resources. As discussed in Section 4.K, Transportation and Parking, of this Draft EIR, the Project would result in a less than significant impact to the transportation infrastructure, with implementation of the required mitigation measures that specify physical improvements at potentially impacted intersections. As discussed in Section 4.L.1, Wastewater and Section 4.L-2, Water Supply, of this Draft EIR, the Project would result in a less than significant impact to wastewater and water infrastructure serving the Project Site and vicinity. Lastly, as discussed in Appendix A-2, Initial Study, of this Draft EIR, the Project would result in a less than significant impact with respect to water and energy resources.</p>
<p>Resource Conservation and Protection of Environmental Quality</p>	
<p>Policy 9: Direct urban development and revitalization efforts to protect natural and man-made amenities and to avoid severe hazard areas, such as flood prone areas, active fault zones, steep hillsides, landslide areas and fire hazard areas.</p>	<p>Consistent: The Project constitutes infill commercial development on an underutilized Project Site, reducing development pressure on the urban fringe. Although the Project would underground an existing flood control channel on the north side of the Project Site, this channel is not prone to flooding and does not support native habitat since it is periodically cleared for flood control purposes. The Project would be designed in accordance with current California Building Code, County of Los Angeles Building Code (Title 26), the Los Angeles County Grading Ordinance, and other regulatory requirements. The undergrounding of the flood control channel would be subject to a Drainage Concept Review by the County Department of Public Works to ensure the design is adequate to prevent flooding. For these reasons, Section 4.G, Hydrology and Water Quality, concluded that the Project would result in less than significant hydrology impacts, including flooding. As discussed in Appendix A-2, Initial Study, of this Draft EIR, the Project Site is not</p>

Table 4.H-3 (Continued)

**Comparison of the Project to Applicable Policies
of the County General Plan General Goals and Policies Chapter**

Policy/Goal	Analysis of Project Consistency
	located within an active fault zone or landslide area, or in an area of steep hillsides, and compliance with applicable design regulations would ensure that there would be no impact or a less than significant impact related to these environmental topics. As concluded in Section 4.J.1, Fire Protection and Emergency Services, of this Draft EIR, the Project would result in a less than significant impact with respect to increased demand for fire protection services.
Policy 10. Protect areas that have significant natural resources and scenic values, including significant ecological areas, the coastal zone.	Consistent. As discussed in Appendix A-2, Initial Study, of this Draft EIR, the Project is not located in a designated significant ecological area or coastal zone. As also discussed in the Initial Study and in Section 4.C, Biological Resources, of this Draft EIR, the Project would result in less than significant impacts on biological resources. As discussed in Section 4.A, Aesthetics, of this Draft EIR, the Project would result in a less than significant impact on scenic vistas.
Policy 11. Protect cultural heritage resources.	Consistent. As concluded in Appendix A-2, Initial Study, of this Draft EIR, the Project Site was used for agricultural cultivation through the mid-1990s and has been fallow for over a decade. No buildings remain on the Site, which is undeveloped except for the temporary detour road and related facilities constructed by ACE as part of the Nogales Street Grade Separation Project. An archaeological records search was conducted for the Project Site through the South Central Coastal Information System (SCCIS) in July 2015, and no historic resources were identified on the Site or in the vicinity. Nonetheless, in response to community interest and in acknowledgment of the Project Site’s history and location, the Project is proposed to include a historically themed centrally located common area within the Commercial Center on Parcel 1.
Policy 12. Conserve energy to ensure adequate supplies for future use.	Consistent. The Project would be designed to comply with the County’s Green Building Program. Accordingly, the Project would meet the standards for LEED® Silver-level certification or the equivalent, through the implementation of green building techniques and energy conservation features. Some key Project features intended to contribute to energy efficiency include high-efficiency fixtures and appliances; the use of drought-tolerant and water-efficient landscaping; water conservation measures including installation of low-flow fixtures and smart irrigation controls; and stormwater retention and treatment on-site. Further, the Project constitutes infill development in an area with an ample housing supply and would allow nearby residents to find goods and services in their immediate vicinity.

Table 4.H-3 (Continued)

**Comparison of the Project to Applicable Policies
of the County General Plan General Goals and Policies Chapter**

Policy/Goal	Analysis of Project Consistency
<p>Policy 13. Conserve the available supply of water and protect water quality.</p>	<p>Consistent. As discussed above, the Project would meet the standards for LEED® Silver-level certification or the equivalent. As discussed in Section 4.L.1, Wastewater, and Section 4.L-2, Water Supply, of this Draft EIR, adequate water supply would be available to serve the Project, which would reduce water use through the implementation of high-efficiency fixtures and appliances; the use of drought-tolerant and water-efficient landscaping; the installation of low-flow fixtures and smart irrigation controls; and stormwater retention and treatment on site. Lastly, as discussed in Section 4.G, Hydrology and Water Quality, of this Draft EIR, the Project would result in a less than significant impact to water quality with the implementation of structural BMPs in accordance with the County’s LID Ordinance, including media filters, underground detention basins, and bio-filtration devices.</p>
<p>Policy 14: Restore and protect air quality through the control of industrial and vehicular emissions, improved land use management, energy conservation and transportation planning.</p>	<p>Consistent: The Project constitutes urban infill development on a Project Site already well served by existing transportation infrastructure and in proximity to existing housing. In this manner, the Project would promote employment and economic growth while reducing vehicle miles traveled and reducing development pressure on the urban fringe. Further, the Project would incorporate energy-efficient design features consistent with LEED® Silver-level certification or the equivalent. Some key Project features intended to contribute to energy efficiency include high-efficiency fixtures and appliances; the use of drought-tolerant and water-efficient landscaping; water conservation measures including installation of low-flow fixtures and smart irrigation controls. As discussed in Section 4.B, Air Quality, of this Draft EIR, the Project. Further, as discussed in Section 4.K, Transportation and Parking, of this Draft EIR, the Project would result in a less than significant impact on the transportation infrastructure with the incorporation of required mitigation measures that specify physical improvements at potentially impacted intersections.</p>
<p>Policy 15. Promote more effective recycling and reuse of resources, especially those that are non-renewable.</p>	<p>Consistent. The Project would meet the standards for LEED® Silver-level certification or the equivalent to promote energy conservation and a reduction in the use of non-renewable resources. Recycling bins would be provided by the individual businesses in the commercial center and the hotels, per the LACC.</p>

Table 4.H-3 (Continued)

**Comparison of the Project to Applicable Policies
of the County General Plan General Goals and Policies Chapter**

Policy/Goal	Analysis of Project Consistency
Land Use and Urban Development Pattern	
<p>Policy 17. Promote the efficient use of land through a more concentrated pattern of urban development, including the focusing of new urban growth into areas of suitable land.</p>	<p>Consistent. The Project constitutes infill commercial development on an underutilized parcel within an urban, developed portion of unincorporated Los Angeles County. By developing a site already well served by existing transportation infrastructure and in proximity to existing housing, the Project would promote employment and economic growth while reducing vehicle miles traveled and reducing development pressure on the urban fringe.</p>
<p>Policy 18. Maintain a balance between increased intensity of development and the capacity of needed facilities such as transportation, water and sewage systems.</p>	<p>Consistent. As discussed in Section 4.K, Transportation and Parking, of this Draft EIR, the Project would result in a less than significant impact to the transportation infrastructure with the incorporation of mitigation measures that specify physical improvements at potentially impacted intersections. Further, as concluded in Section 4.L.1, Wastewater and Section 4.L.2, Water Supply, of this Draft EIR, the Project would result in a less than significant impact on wastewater and water infrastructure serving the Project Site and vicinity.</p>
<p>Policy 21. Promote compatible, environmentally sensitive development of by-passed vacant land in in urban areas.</p>	<p>Consistent. The Project constitutes infill development on an underutilized parcel within an already developed urban portion in the unincorporated County. By developing a site already well-served by existing transportation infrastructure and in proximity to existing housing, the Project would promote employment and economic growth while reducing vehicle miles traveled and reducing development pressure on the urban fringe, consistent with CAPCOA guidance, as discussed in Section 4.B, Air Quality, of this Draft EIR. As discussed throughout this Draft EIR, the majority of the Project’s environmental impacts would be less than significant with the incorporation of mitigation measures, with the exception of operational air quality impacts associated with regional VOC and NO_x emissions generated by Project-related trips.</p>
Urban Form	
<p>Policy 24. Focus intensive urban uses in an interdependent system of activity centers located to effectively provide services throughout the urban area and supported by adequate public transportation facilities.</p>	<p>Consistent. The Project constitutes infill commercial development on an underutilized site located within a corridor of light industrial and commercial uses lining SR-60 that would allow for nearby residents to find goods and services in their immediate vicinity. Further, the Project Site is served by the Foothills Transit Authority, which operates Bus Lines 178 and 289 along Nogales Street east of the Project Site. Both lines maintain stops along Nogales Street between Gale Avenue and Nogales Street, approximately 0.2 miles east of the Project Site. Regional rail service in the Project vicinity is provided by the Metrolink Riverside Route, which provides service</p>

Table 4.H-3 (Continued)

**Comparison of the Project to Applicable Policies
of the County General Plan General Goals and Policies Chapter**

Policy/Goal	Analysis of Project Consistency
	between Union Station in Los Angeles and downtown Riverside. The Metrolink Industry Station is located approximately 2.7 miles northeast of the Project Site.
Policy 25. Foster community identity and improve environmental quality by the compatible interrelation of a system of centers, major transportation facilities and open space areas.	Consistent. The Project constitutes infill commercial development on an underutilized site located within a corridor of light industrial and commercial uses lining SR-60 that would allow for nearby residents to find goods and services in their immediate vicinity. Several transit options are available in the Project vicinity as an alternative to private vehicles. The Project would improve its connectivity with adjacent development by constructing a new driveway would also provide access to Parcel 1, the Commercial Center, from the existing shared driveway with the Rowland Heights Plaza Shopping Center to the east.
Policy 26. Promote and reinforce the multi-focused pattern of regional linear activity areas and centers.	Consistent. The Project constitutes infill commercial development on an underutilized site located within a corridor of light industrial and commercial uses lining SR-60 that would allow for nearby residents to find goods and services in their immediate vicinity.
Policy 27. Maintain and reinforce the multi-focused pattern of regional linear activity areas and centers.	Consistent. The Project constitutes an infill Project on an underutilized Site located within a corridor of light industrial and commercial uses lining the SR-60 that would allow for nearby residents to find goods and services in their immediate vicinity.
Policy 31. Encourage the location of employment opportunities in regional centers and in the regional core and linear activity areas.	Consistent. The Project constitutes infill commercial development on an underutilized site located within a corridor of light industrial and commercial uses lining the SR-60 that would allow for nearby residents to find goods and services in their immediate vicinity.
Policy 36. Promote the development of internal circulation in multi-purpose centers.	Consistent. The Project would maintain and improve the pedestrian environment along Gale Avenue by improving the existing sidewalk, providing a landscaped setback, and providing dedicated pedestrian access, separate from vehicular access. The Project is also intended to support and enhance pedestrian mobility within the Project Site and between the Project Site and the commercial uses to the east, south, and west along Gale Avenue.
Public Services	
Policy 54. Promote the full use of existing service systems in order to gain maximum benefit from previous public investments.	Consistent. The Project constitutes infill commercial development on an underutilized site served by existing utility facilities. The Project would include on-site utility improvements and connections to off-site municipal infrastructure, including domestic and fire water systems (connecting to the Rowland Water District), wastewater infrastructure (connecting to the City of Industry municipal system, which is maintained by the County), and

Table 4.H-3 (Continued)

**Comparison of the Project to Applicable Policies
of the County General Plan General Goals and Policies Chapter**

Policy/Goal	Analysis of Project Consistency
	<p>electricity, natural, gas, and telecommunications infrastructure. On-site storm drain infrastructure would be constructed in compliance with County LID Standards. As concluded in Section 4.L.1, Wastewater and Section 4.L.22, Water Supply, of this Draft EIR, the Project would result in a less than significant impact to wastewater and water infrastructure serving the Project Site and vicinity. Lastly, as discussed in Section 4.G, Hydrology and Water Quality, of this Draft EIR, the Project would result in a less than significant impact to water quality with the implementation of structural BMPs in accordance with the County's LID Ordinance, including media filters, underground detention basins, and bio-filtration devices.</p>
Economic Development	
<p>Policy 60. Encourage a strong, diversified economy that will provide business opportunities, an adequate number of jobs for this county's labor force and an improved standard of living.</p>	<p>Consistent. The Project would encourage employment opportunities (during construction and operation) within an existing commercial and light industrial area. The provision of hotels and commercial buildings would provide for a range of employment opportunities and enhance commercial services in the area. It would provide this employment within an existing urban area and in proximity to transit options.</p>
<p>Policy 63. Encourage the retention of jobs and investments in older urban areas and prevent losses to other counties, regions, and states.</p>	<p>Consistent. The Project constitutes infill commercial development on an underutilized parcel within an urban, developed portion of unincorporated Los Angeles County. By developing a site already well served by existing transportation infrastructure and within proximity to existing housing, the Project would promote employment and economic growth while reducing vehicle miles traveled and reducing development pressure on the urban fringe.</p>
<p>Policy 64. Promote jobs within commuting range of urban residential areas in order to reduce commuting time, save energy, reduce air pollution, and improve public convenience.</p>	<p>Consistent. The Project would encourage a variety of jobs within an already developed and urbanized portion of the County. By developing a site already well served by existing transportation infrastructure and within proximity to existing housing, the Project would promote employment and economic growth while reducing vehicle miles traveled and reducing development pressure on the urban fringe.</p>

Source: PCR Services Corporation, 2015.

(d) Los Angeles County General Plan – General Plan Elements

Table 4.H-4, *Comparison of the Project to Applicable Policies of the County General Plan Elements*, evaluates the consistency of the Project with policies of the individual elements of the 1980 General Plan. The Project constitutes infill commercial development on an underutilized site that proposes a range of commercial uses similar in use and scale as those in the Project vicinity, and designed in accordance with the Rowland Heights CSD. The Project would be designed to comply with the County’s Green Building Program and achieve LEED® Silver-level certification. The Project Site is located in proximity to public transit options that provide an alternative to private vehicles, including Foothill Transit Bus Lines 178 and 289. During construction, BMPs would be implemented in accordance with the National Pollutant Discharge Elimination Program (NPDES) Permit Stormwater Pollutant Prevention Plan (SWPPP) to control erosion and prevent pollutants from leaving the Site. During operation, structural BMPs would be incorporated into the Project design in accordance with the County’s LID Ordinance and SUSMP standards. These structural BMPs would maintain the flow and quality of stormwater runoff leaving the Project Site. As discussed in Table 4.H-4, the Project would be consistent with applicable policies of the General Plan Elements.

Table 4.H-4

**Comparison of the Project to Applicable Policies
of the County General Plan Elements**

Recommendation	Analysis of Project Consistency
Land Use Element	
Policy 3. Place major emphasis on channeling new intensive commercial development into multipurpose centers.	Consistent. The Project constitutes infill development proposing a mix of commercial uses on an underutilized site within a corridor of similar uses, including retail, restaurant, hotel uses, and light industry.
Policy 4. Protect prime industrial lands from encroachment of incompatible uses.	Consistent. With the exception of the proposed hotels, the Project’s proposed mix of commercial uses is permitted within the M-1.5-BE zone. For Parcels 2 and 3, the Project Applicant is requesting a Zone Change from M-1.5-BE to C-3-(DP). With County approval of the Development Program CUP, the hotels would be deemed consistent with the nearby zoned for industrial uses. The proposed uses would also not encroach on parcels zoned for industrial uses adjacent to the Project Site or across Gale Avenue because they are already developed with similar commercial uses (i.e., commercial shopping plazas and hotels).
Policy 7. Assure that new development is compatible with the natural and manmade environment by implementing appropriate locational controls and high quality design standards.	Consistent. The Project would be compatible with the uses and scale of existing development in the Project vicinity. Further, the final building designs would also include aesthetic elements such as building articulations and distinguishable materials in accordance with Section 22.44.132(D)(2)(g) of the Rowland Heights CSD.
Policy 9. Promote neighborhood commercial facilities which provide convenience goods and services and complement community character through appropriate scale, design and locational controls.	Consistent. The Project would provide a variety of commercial uses that would allow for nearby residents to find goods and services close by. The Project would be compatible with the uses and scale of existing commercial development in the immediate vicinity. Further, the final building designs would also include aesthetic elements

Table 4.H-4 (Continued)

**Comparison of the Project to Applicable Policies
of the County General Plan Elements**

Recommendation	Analysis of Project Consistency
	such as building articulations and distinguishable materials in accordance with Section 22.44.132(D)(2)(g) of the Rowland Heights CSD.
<p>Policy 20. Establish land use controls that afford effective protection for significant ecological and habitat resources, and lands of major scenic value.</p>	<p>Consistent. As discussed in Appendix A-2, Initial Study, of this Draft EIR, the Project is not located in a designated significant ecological area or coastal zone. As also discussed in the Initial Study, the Project would result in a less than significant impact to biological resources. As discussed in Section 4.A, Aesthetics, of this Draft EIR, the Project would result in a less than significant impact with respect to Aesthetics.</p>
<p>Policy 24. Promote compatible land use arrangements that reduce reliance on the private automobile in order to minimize related social, economic and environmental costs.</p>	<p>Consistent. The Project would constitute an infill commercial Project within close proximity to transit options that provide an alternative to private vehicles. Foothill Transit Bus Lines 178 and 289 maintain bus stops along Nogales Street between Gale Avenue and Nogales Street, approximately 0.2 mile east of the Project Site. Regional rail service in the Project vicinity is provided by the Metrolink Riverside Route, which provides service between Union Station in Los Angeles and downtown Riverside. The Metrolink Industry Station is located approximately 2.7 miles northeast of the Project Site, and the Project includes short-and long-term bicycle parking, including showers, in compliance with the LACC. The Project would improve pedestrian connections in the Project vicinity by improvement the streetscape and sidewalk along Gale Avenue, and providing pedestrian connections to the adjacent Rowland Heights Shopping Center, allowing patrons to reduce the number of vehicle trips.</p>
<p>Policy 25. Promote land use arrangements that will maximize energy conservation.</p>	<p>Consistent. The Project would constitute infill commercial development in close proximity to transit options that provide an alternative to private vehicles. The Project would create employment opportunities in an area with an ample housing supply, and would allow nearby residents to find goods and services in their immediate vicinity. Lastly, the Project would improve pedestrian connections between the Project Site and adjacent land uses.</p>
<p>Conservation and Open Space Element</p>	
<p>Policy 1. Actively support strict air quality regulations for mobile and stationary sources, and continued research to improve air quality. Promote vanpooling, car pooling and improved public transportation.</p> <p>Policy 2. Support the conservation of energy and encourage the development and utilization of new energy sources including geothermal, thermal waste, solar, wind and ocean-related sources.</p>	<p>Consistent. The Project would constitute an infill commercial Project within close proximity to transit options that provide an alternative to private vehicles. The Project would meet the standards for LEED® Silver-level certification or the equivalent to promote energy conservation and a reduction in the use of non-renewable resources. Key Project features the installation of heating, ventilation, and air conditioning (HVAC) systems that</p>

Table 4.H-4 (Continued)

**Comparison of the Project to Applicable Policies
of the County General Plan Elements**

Recommendation	Analysis of Project Consistency
	utilize ozone-friendly refrigerants; use of materials and finishes that emit low quantities of VOCs; use of high-efficiency fixtures and appliances; water conservation features that exceed applicable standards for reduced indoor water use by at least 35 percent; recycling of solid waste; and use of drought-tolerant and water-efficient landscaping. As discussed in Section 4.B, Air Quality, of this Draft EIR, the Project would reduce vehicle trips and air pollution.
<p>Policy 4. Protect ground water recharge and watershed areas, conserve storm and reclaimed water, and promote water conservation programs.</p>	<p>Consistent. The Project would incorporate drought-tolerant and water-efficient landscaping consistent with County Code requirements regulating same. Water conservation measures would include the installation of low-flow fixtures and smart irrigation controls and stormwater retention and treatment on-site. As discussed in Appendix A-2, Initial Study, of this Draft EIR, while the Project would replace pervious surfaces on the Project Site with impervious (i.e., paved or developed) surface, the majority of the Site is underlain by bedrock at shallow depth, and precipitation does not infiltrate sufficiently to contribute measurably to groundwater recharge. As discussed in Section 4.G, Hydrology and Water Quality, of this Draft EIR, the Project would result in a less than significant impact to water quality.</p>
<p>Policy 5. Encourage the maintenance, management and improvement of the quality of imported domestic water, ground water supplies, natural runoff and ocean water.</p>	<p>Consistent. The Project would underground the partially channelized storm drain running along the northern Site boundary. As discussed in Section 4.G, Hydrology and Water Quality, of this Draft EIR, the Project would result in a less than significant impact to water quality.</p>
<p>Policy 6. Preserve significant agricultural resource areas and encourage the expansion of agricultural activities into under-utilized lands such as utility rights-of-way and flood prone areas.</p>	<p>Consistent. The Project Site was used for agricultural cultivation through the mid-1990s, but is presently fallow and undeveloped except for the temporary facilities constructed by ACE as part of the Nogales Street Grade Separation Project, and is zoned for Restricted Heavy Manufacturing (M-1.5). As discussed in Appendix A-2, Initial Study, of this Draft EIR, the Project Site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor is it under a Williamson Act contract.</p>
<p>Policy 12. Protect watershed, streams, and riparian vegetation to minimize water pollution, soil erosion and sedimentation, maintain natural habitats, and aid in ground water recharge.</p>	<p>Partially Consistent. The Project would underground the partially channelized storm drain running along the northern Site boundary. Although it is periodically cleared of vegetation to maintain storm flow capacity, the storm drain channel currently supports willows and other riparian and upland vegetation. With Project implementation, the storm drain channel would be undergrounded, resulting in the loss of the riparian and upland vegetation that may serve as wildlife habitat. Refer</p>

Table 4.H-4 (Continued)

**Comparison of the Project to Applicable Policies
of the County General Plan Elements**

Recommendation	Analysis of Project Consistency
	to Section 4.C, Biological Resources, for a detailed discussion of the Project’s impacts on riparian habitat. Refer to pertinent discussion in Section 4.G, Hydrology and Water Quality. The Project would result in a less than significant impact to water quality, including sedimentation and erosion, through adherence with applicable regulations and the provision of stormwater retention and treatment.
<p>Policy 16. Protect the visual quality of scenic areas including ridgelines and scenic views from public roads, trails and key vantage points.</p>	<p>Consistent. The Project’s aesthetic impacts are discussed in Section 4.A, Aesthetics, of this Draft EIR. As discussed therein, through implementation of an attractive architectural design, the Project would result in a less than significant impact with regard to visual character, including views from Gale Avenue. The Project would not impact ridgeline or views from trails.</p>
<p>Policy 17. Protect cultural heritage resources, including historical, archaeological, paleontological and geological sites, and significant architectural structures. Policy 19. Promote public awareness of cultural resources.</p>	<p>Consistent. Although the Project Site contains no listed historic resources, it was previously occupied by the Rowland family farm. Parcel 1, the Commercial Center, would include a centrally located common area that acknowledges the Project Site’s history and location.</p>
<p>Policy 22. Restrict urban development in flood prone areas, and thus avoid major new flood control works. Maintain natural watershed processes by regulating development in tributary watersheds. Minimize increased runoff, erosion, and siltation of streambeds that would limit the uses of streams and water bodies for recreation and other beneficial water-related uses.</p>	<p>Inconsistent. The Project would underground the partially channelized storm drain running along the northern Site boundary. Although it is periodically cleared of vegetation to maintain storm flow capacity, the storm drain channel currently supports willows and other riparian and upland vegetation. The Project would implement structural stormwater facilities to maintain runoff volumes and reduce the potential for pollutants to enter stormwater flows. See pertinent discussion in Section 4.G, Hydrology and Water Quality and Section 4.C, Biological Resources.</p>
<p>Policy 34. Encourage the maintenance of landscaped areas and pollution-tolerant plants in urban areas. Integrate landscaping and open space into housing, commercial and industrial developments especially in urban revitalization areas. Use drought-resistant vegetation.</p>	<p>Consistent. The Project would include proposed open space and landscape amenities to enhance the pedestrian environment and respond to community input on the Project. The open space would include a centrally located community gathering common area that includes seating and enhanced landscaping. The drive aisles and traffic medians would be landscaped, and Parcel 1, the Commercial Center, would also be developed with outdoor seating and landscaped planters throughout. The Project would meet the standards for LEED® Silver-level certification or the equivalent. The Project would incorporate drought-tolerant and efficient landscaping. Water conservation measures would also include the installation of low-flow fixtures and smart irrigation controls; and of stormwater retention and treatment on-site.</p>

Table 4.H-4 (Continued)

**Comparison of the Project to Applicable Policies
of the County General Plan Elements**

Recommendation	Analysis of Project Consistency
<p>Policy 35. Support preservation of heritage trees. Encourage tree planting programs to enhance the beauty of urban landscaping.</p>	<p>Consistent. Parcel 1, the Commercial Center, would include a centrally located community gathering common area that includes seating and enhanced landscaping.</p>
<p>Transportation Element</p>	
<p>Policy 6. Support the development of a mass transportation system that will provide a viable alternative to the automobile. Policy 7. Support continued improvement and expansion of the present bus system as a public service. Policy 20. Encourage greater use of public transit to special-purpose centers and recreational facilities. Policy 26. Encourage the efficient use and conservation of energy used in transportation.</p>	<p>Consistent. The Project would constitute infill commercial development that would facilitate transit as an alternative to private vehicles. Primary project access would be from Gale Avenue. Foothill Transit Bus Lines 178 and 289 maintain bus stops along Nogales Street between Gale Avenue and Nogales Street, approximately 0.2 miles east of the Project Site. Regional rail service in the Project vicinity is provided by the Metrolink Riverside Route, which provides service between Union Station in Los Angeles and downtown Riverside. The Metrolink Industry Station is located approximately 2.7 miles northeast of the Project Site.</p>
<p>Policy 13. Support low capital strategies that maximize the efficiency and cost-effectiveness of existing transportation facilities and systems.</p>	<p>Consistent. The Project would constitute infill commercial development along established transit corridors. By increasing the intensity of development on a site already served by existing transportation infrastructure, the Project would help to maximize the efficiency of the existing transportation system.</p>
<p>Policy 17. Develop parking management plans for application in selected areas of urban concentration.</p>	<p>Consistent. As concluded in Section 4.K, Transportation and Parking, of this Draft EIR, the Project would provide parking in excess of LACC requirements. In addition, the Project would benefit from the development of co-located retail commercial and hotel uses, further reducing the Project's parking requirements. As a result, the Project would provide parking in excess of the demand created by the proposed uses.</p>
<p>Economic Development Element</p>	
<p>Policy 9. Support the revitalization and rehabilitation of deteriorating industrial, commercial, and office centers. Prepare and periodically update an Industrial and Commercial Revitalization Program, and adopt policies and measures necessary for its implementation.</p>	<p>Consistent. The Project constitutes an infill project that would develop a variety of commercial uses (i.e., hotel, retail, commercial office, and restaurant) on an underutilized Project Site.</p>
<p>Bicycle Master Plan</p>	
<p>Policy IA 1.3.2. Require bicycle parking at key locations, such as employment centers, parks, transit, schools, and shopping centers.</p>	<p>Consistent. Short-term and long-term bicycle facilities, and related amenities such as showers, are proposed as part of the Project for the commercial center and both hotels in compliance with LACC requirements.</p>

Source: PCR Services Corporation, 2015.

(e) Los Angeles County General Plan – Rowland Heights Community Plan

Table 4.H-5, Comparison of the Project to Applicable Policies of the Rowland Heights Community Plan, evaluates consistency of the Project with policies of the goals and policies of the Rowland Heights Community Plan. The Project would retain the general character of the Rowland Heights Community by providing for infill commercial development on an underutilized property in an existing light-industrial and commercial corridor along SR-60, thus reducing the pressure for growth in the more residential portion of the Community Plan area. Further, the Project would implement the design standards and setbacks of the Rowland Heights CSD to ensure a design compatible with the surrounding community. As discussed in Table 4.H-5, the Project would be consistent with applicable policies of the Rowland Heights Community Plan.

Table 4.H-5

Comparison of the Project to Applicable Policies of the Rowland Heights Community Plan

Policy/Goal	Analysis of Project Consistency
<p>Goal 4. Balance projected growth and development with environmental considerations.</p>	<p>Consistent. The Project constitutes an infill development in an area well served by existing transportation infrastructure, including public transit, and housing. By developing a Site within proximity to existing housing, the Project would promote employment and economic growth while reducing vehicle miles traveled and reducing development pressure on the urban fringe. Further, by providing hotel opportunities within proximity to light and industrial uses, the Project would reduce vehicle miles traveled for business travelers.</p>
<p>Goal 5. Beautify commercial areas and highways.</p>	<p>Consistent. The Project would be designed in accordance with the design standards of the Rowland Heights CSD, including providing a landscaped setback along Gale Avenue, site landscaping that uses a cohesive plant palette, attractive building design, and common open space amenities that will include landscaping, seating, and other features.</p>
<p>Policy 8. Encourage the beautification of new and existing commercial areas. This can be achieved through the combined efforts of the public and private sectors. Where practical, adhere to the following guidelines:</p> <ul style="list-style-type: none"> a. Complete landscaping of public rights-of-way. b. Provide a minimum of ten feet of landscaping along the street frontage of commercial uses. This shall include plants, landscaped berms, or a combination of these, capable of providing screening up to a height of 42". c. Landscape a minimum of five percent of the parking area. d. Freestanding portable signs are prohibited. e. Limit signs to one for each street frontage of a shopping center listing all businesses. The sign should reflect the architectural style of the center. 	<p>Consistent. As proposed, the Project includes a 10-foot-wide landscaped setback along Gale Avenue, and traffic islands within the surface parking lots and the planter strips lining drive internal drive aisles would be planted with trees, shrubs, and groundcover using a cohesive plant palette. The Project requires Director’s Review approval of a Sign Program prepared pursuant to applicable regulations, including the Freestanding Sign Regulations (LACC 2.44.132.D.2.a[ii]). As concluded in the discussion of consistency the LACC Code in Threshold LU-2 below, the Project is consistent in use, scale, density, and design with existing development in the Project vicinity. Conditions of approval for the Project’s requested Development Program CUP (for the proposed hotels) and Sign Program would ensure the Project’s proposed design features are</p>

Table 4.H-5 (Continued)

Comparison of the Project to Applicable Policies of the Rowland Heights Community Plan

Policy/Goal	Analysis of Project Consistency
<p>f. New commercial uses shall be sensitive to neighboring uses.</p> <p>g. All businesses in a center (three establishments or more) should present a general harmony of facades. Conditional use permits will be required of new commercial centers to insure that these concerns are addressed.</p>	<p>responsive to CSD requirements and that the proposed commercial uses are planned and designed in a manner sensitive to adjacent uses.</p>
<p>Policy Safety 2. All proposals for development within a seismic management zone must include an evaluation of the site prepared by a geologist registered in the State of California.</p>	<p>Consistent. As discussed in Section 4.E, Geology and Soils, of this Draft EIR, the Project Site is located within the La Habra Quadrangle, which depicts the Whittier Fault, an Alquist-Priolo Earthquake Fault Zone, about three miles to the south of the Project Site. The Project would incorporate the building-specific recommendations of the Geotechnical Report, Updated Geotechnical Report, and final geotechnical report per County approval. As concluded in Section 4.E, Geology and Soils, of this Draft EIR, the Project would result in a less than significant impact with respect to Geology and Soils.</p>
<p>Policy Safety 4. Prohibit the placement of any structure for human occupancy, public or private, across the trace of an active fault.</p> <p>Policy Safety 5. Prohibit the placement of any school, hospital, office building, multiple family residence, commercial structure, or other high intensity use within 50 feet of an active fault trace.</p>	<p>Consistent. As discussed in Section 4.E, Geology and Soils, of this Draft EIR, the Whittier Fault is the nearest active fault to the Project Site, and is located about three miles south. The Project Site is not underlain by an active fault or trace.</p>
<p>Policy Noise 2. Encourage the location of commercial and industrial structures where appropriate along freeway and highway routes.</p>	<p>Consistent. The Project constitutes an infill development on an underutilized Project Site served by existing transportation infrastructure. Primary Project access would be from Gale Avenue, which provides access to SR-60 via Nogales Street and 7th Avenue; the Nogales Street interchange is approximately one-half mile southeast of the Project Site.</p>
<p>Policy Noise 4. Encourage the use of carpools, buses and other forms of mass transit.</p>	<p>Consistent. Several transit options are available in the Project vicinity as an alternative to private vehicles. Foothill Transit Bus Lines 178 and 289 maintain bus stops along Nogales Street between Gale Avenue and Nogales Street, approximately 0.2 mile east of the Project Site. Regional rail service in the Project vicinity is provided by the Metrolink Riverside Route, which provides service between Union Station in Los Angeles and downtown Riverside. The Metrolink Industry Station is located approximately 2.7 miles northeast of the Project Site.</p>

Source: PCR Services Corporation, 2015.

(2) Los Angeles County Code

Threshold LU-2: A significant impact would occur if the Project would be inconsistent with the County zoning ordinance as applicable to the Project Site.

Impact Statement LU-2: *With County approval of the Project's requested zone change, CUPs, and Parking Permit, proposed uses would be consistent with allowable land uses and design parameters for the current and requested zoning designations. Impacts would be less than significant.*

The Project would be developed pursuant to the provisions of the County Zoning Ordinance (LACC Title 22), which implements the General Plan, inclusive of its Community Plans. In the case of this Project, the General Plan Land Use Element is supplemented by the Rowland Heights Community Plan, which is in turn implemented by the Rowland Heights CSD (codified as Section 22.44.132 of the LACC). Among other provisions, the County Zoning Ordinance defines the permitted land uses on a site, height restrictions, minimum lot size, maximum lot coverage, and setbacks. The LACC also provides zoning restrictions on parking (please refer to Section 4.K, Transportation and Parking, of this Draft EIR for a discussion of Project parking). Development on the northern 0.79-acre parcel within the City of Industry is compared against the City's Municipal Code provisions for the Industrial (I) zoning designation.

(a) County of Los Angeles Zoning Ordinance

(i) Existing & Proposed Zoning Designations

The Project's proposed commercial uses (retail, restaurant, and office commercial condominiums) are permitted in the M-1.5-BE zone with issuance of a CUP. Project applications include a CUP application to authorize a commercial shopping center containing more than three business establishments. The CUP would also provide for the sale of a full line of alcoholic beverages in accordance with LACC 22.28.210.A and 22.56.195. With approval of the requested CUP, the Project's proposed commercial uses would be consistent with the permitted uses in the M-1.5 zone, including the sale of alcoholic beverages.

Because hotels are a prohibited use in the M-1.5-BE zone, the Project Applicant is requesting a Zone Change to designate Parcels 2 and 3 as C-3-DP (Unlimited Commercial-Development Program). The "C-3" portion of the zoning designation denotes Unlimited Commercial, which permits a wide range of commercial uses, as well as mixed-use and residential uses, and hotels, subject to Director's approval or a CUP. The "-DP" portion of the zoning designation indicates that a Development Program is also being sought by the Project Applicant in association with the proposed Zone Change to establish the development parameters for hotel development on Parcels 2 and 3. Parcel 1, the Commercial Center, would remain within the M-1.5-BE zone, but would also be subject to CUP review for uses on the parcel, as well a Vesting Tentative Parcel Map for the sale of commercial condominiums on Parcel 1.

(ii) Project Building Heights and Maximum Developed Area

Section 22.44.132(D) of the Rowland Heights CSD limits building height in the M-1.5 zone to that permitted in the C-3 zone, or 45 feet above grade, excluding chimneys and rooftop antennas. Further, LACC Section 22.44.132(D)(4) limits buildings to three stories in height and requires the third story to be used for office uses. Because Parcel 1 (Commercial Center) would continue to be zoned M-1.5, the four buildings proposed on Parcel 1 would be subject to these height limitations. Building Nos. 1 and 4, along the Gale Avenue

frontage of Parcel 1, would be two stories and a maximum of approximately 35 feet in height above adjacent grade (to top of parapet). Buildings 2 and 3 on the northern portion of Parcel 1 would be one story and approximately 24 to 27 feet in height above adjacent grade (to top of parapet), with rooftop projections or towers up to approximately 35 feet in height above adjacent grade. Thus, the Project's commercial uses would be consistent with the height limitations of the M-1.5 zone. While the Rowland Heights CSD does not establish a maximum FAR, it limits the lot coverage to 40 percent of the net lot area; Parcel 1 lot coverage would be approximately 26.6 percent. Thus, development of the Commercial Center would be well within the maximum lot coverage standard of the Rowland Heights CSD.

Height limitations in the C-3 zone in the Rowland Heights CSD are the same as those for the M-1.5 discussed above. However, the Project Applicant is seeking a Development Program CUP in conjunction with the proposed Zone Change for Parcels 2 and 3. Per LACC Section 22.56.200, the development parameters of the underlying zoning shall not apply to uses permitted by a CUP; rather, the County's land use decision-making body—in this case, the Regional Planning Commission—is authorized to prescribe the height limit and maximum lot coverage or FAR for the conditionally approved use. Because a Development Program CUP is being requested in association with the Zone Change to C-3-DP for Parcels 2 and 3, the requested Development Program CUP would set the development parameters for these two parcels, in accordance with LACC Section 22.40.050. As proposed, the Project's Development Program, if approved by the Planning Commission, would permit the hotel buildings to be six stories and 72 feet above grade, with rooftop mechanical equipment up to 80 feet above grade. The Development Program would establish an FAR for the full-service hotel (Hotel A) on Parcel 2 at 1.35:1, while the FAR for the extended stay hotel (Hotel B) on Parcel 3 would be 1.55:1. Therefore, with County approval of the Development Program CUP in association with the proposed Zone Change for Parcels 2 and 3, the proposed hotel uses would be consistent with the height and FAR requirements for Parcels 2 and 3.

(iii) Setbacks

Section 22.44.132(D)(2) of the Rowland Heights CSD requires a setback of 15 feet from the property line for all commercial and industrial development within the CSD. The first 10 feet of the setback must be landscaped. As discussed in Chapter 2.0, Project Description, the Project proposes a 10-foot-wide landscaped area along the Gale Avenue frontage, which would be fronted by a 5-foot-wide sidewalk, for a total setback of 15-foot-wide setback along Gale Avenue. Although the CSD does not require side or rear yard setbacks adjacent to commercially zoned property, the Project further includes a 10-foot-wide landscaped setback along the western and northern boundaries. As a result, the Project meets the setback requirements of the LACC and Rowland Heights CSD.

(iv) Sign Program

Section 22.44.132.D.2.a(v) of the Rowland Heights CSD requires business wall signs to be limited to one square foot for each linear foot of building frontage. Roof signs are prohibited, and freestanding signs are limited to 20 feet in height and 40 square feet per sign face. As part of the Project approvals, the Project Applicant is requesting a discretionary Director's Review of the Project's proposed Sign Program. The Sign Program would include building identification and wayfinding signage. Pedestrian areas, including plazas and walkways, would be well lighted for security. Accent lighting is proposed to complement building architecture, outdoor hotel communal spaces, outdoor seating, and landscaping. A monument sign identifying the hotels and a pylon sign for the commercial uses would mark the primary entrance driveway on Gale Avenue. Within the surface parking areas, pole-mounted light fixtures would be shielded and

directed towards the areas to be lit and away from adjacent sensitive uses. All signage would be intended to serve the on-site uses and activity; no off-site signage (billboard) is proposed. Upon the Director's approval of the proposed Sign Program, the Project would be deemed consistent with the sign regulations of the LACC and Rowland Heights CSD.

(v) Land Use Compatibility

Per LACC Section 22.56.040, a CUP application must demonstrate that the requested use will not have a detrimental effect on surrounding land uses. Thus, the Project Applicant must meet the burden of proof for the Development Program CUP and must be substantiate, among other things, that the proposed development is compatible with surrounding uses.

The Concourse Business Park abuts the west side of the Project Site and would be adjacent to the two proposed six-story hotels. The Concourse Business Park is an office park with one- and two-story buildings separated by surface parking and landscaping. Businesses include wholesale commercial, light industrial (fulfillment operations), and retail uses. Parcels 2 and 3 would be separated from this adjacent property by a decorative wall and landscaped buffer. Beyond the Concourse Business Park, uses along Gale Avenue include the Four Seasons shopping center and wholesale commercial and manufacturing, storage, and distribution businesses. Hotel uses generally are compatible with commercial uses given similar activity levels during the day and the fact that commercial uses usually do not operate at night. In addition, by creating a buffer between proposed buildings and adjacent development, the Project would reduce the massing appearance of the Project. Given the proposed similar uses and massing consistent with uses in the area, the Project would be compatible with the surrounding business and light industrial park setting, as well as with the hotel and shopping centers in the area. Impact would be less than significant.

The Rowland Heights Shopping Center abuts the east side of the Project Site and includes a 99 Ranch Market, retail stores, restaurants, and surface parking. The Rowland Heights Shopping Center would be adjacent to the four two-story commercial buildings proposed for the Commercial Center (Parcel 1). The shopping center's western driveway, accessed from Gale Avenue, abuts the Project Site's eastern boundary and provides access to the loading dock and parking to the rear (north) of the 99 Ranch Market. A new driveway would also provide access to Parcel 1 from the existing shared driveway with the Rowland Heights Plaza Shopping Center to the east. Loading facilities for Parcel 1 would be located on the Project Site and at grade. Loading facilities would be provided to the west of Building No. 1, northwest of Building No. 2, north of Building No 3, and southwest of Building No. 4, and would be accessed from the surface parking lot or drive aisles surrounding the parcel. On Parcels 2 and 3, separate loading facilities would be provided on the western sides of each hotel and would be accessed from the drive aisle along the western edge of the Project Site. Project courtyards and paths would create an open feel on the Project Site and improve pedestrian circulation between the Site and the adjacent Rowland Heights Shopping Center. As a result, the Project's proposed commercial uses would not only be compatible with, but would complement, the Rowland Heights Shopping Center.

The Project Site is bordered on the north by the shared UPRR Los Angeles Subdivision tracks/Metrolink Riverside Line, and by Railroad Street north of the tracks. Beyond the tracks, land uses consist of one- and two-story light industrial warehouses. As with the Concourse Business Park to the west, the Project's proposed uses would not be detrimental to or out of scale with the commercial and light industrial uses north of the Project Site.

A three-story Best Western Plus Executive Inn hotel, which has perimeter surface parking and landscaping, is located directly across Gale Avenue, and Mandarin Plaza Shopping center is located to the southeast. The Project's proposed hotel and commercial uses are similar in use, scale, and design as these commercial uses. Final building designs would include aesthetic elements such as building articulation and varied façade materials, as required by Section 22.44.132(D)(2)(g) of the Rowland Heights CSD. By maintaining the existing sidewalk and providing a landscaped setback along Gale Avenue, the Project would maintain the existing pedestrian network in the vicinity. The landscaped setback, walkways, ground-level store fronts, and Project design would also help activate this portion of Gale Avenue and create a more pedestrian-friendly environment.

The nearest residential uses are across and south of SR-60; these include the Rowland Heights Mobile Estates mobile home park and predominantly single-family residential neighborhoods, all accessed from Colima Road. As mentioned above, the Project's loading facilities would be located on the western and northern sides of the proposed buildings, away from the nearest residential uses. In addition, the Project proposes a landscaped setback along Gale Avenue, as described above. Due to the distance and intervening freeway infrastructure, the Project would result in an almost imperceptible in change to the visual character, setting, and land use relationship to residential neighborhoods south of SR-60. In summary, Project uses and building designs are consistent and compatible with land uses in the vicinity.

(b) City of Industry Zoning

The northernmost 0.79 acres of the Project Site (Northern Parcel) is located in the City of Industry, and is designated on the City's General Plan Land Use Map as Employment,¹⁶ for which allowable uses include a "variety of business and employment uses" including industrial, manufacturing assembly, warehousing, distribution, supporting offices and those commercial uses permitted under the Zoning Code, as well as parking.¹⁷ The corresponding zoning designation on the City's Zoning Map¹⁸ is "I" (Industrial, still listed in the City's Zoning Code with the prior Industrial designation "M"),¹⁹ which permits a broad range of commercial and industrial uses, including manufacturing. Special industrial development standards are applicable to some permitted uses and address parking and loading, landscaping, and the siting and design of fences and walls, outdoor lighting, and trash enclosures.

The 0.79-acre parcel in the City of Industry would accommodate surface parking spaces that count toward fulfillment of the County's Parking Code requirement for the Project. A drive aisle would allow private and emergency response vehicle access between the Parcel 1 and Parcels 2 and 3. No buildings or other improvements are proposed for this parcel, apart from necessary storm drain, water, and wastewater infrastructure, and landscaping improvements. Surface parking is a permitted use in the City's I zone; thus, the proposed parking on the Northern Parcel would be consistent with City of Industry zoning regulations.

¹⁶ *City of Industry, General Plan Land Use Map, adopted June 6, 2104;*

¹⁷ *City of Industry, General Plan, adopted June 2014; <http://www.cityofindustry.org/?p=city-hall&s=general-plan>. Accessed September 17, 2015.*

¹⁸ *City of Industry, Zoning Map, December 16, 2014; file:///C:/Users/A.Doehne/Downloads/ZoningUpdate141216.pdf. Accessed September 17, 2015.*

¹⁹ *City of Industry Zoning Code, Chapter 17.16.010.*

(c) Conclusion

As indicated above, the Project would be consistent with the applicable planning and regulatory documents. Therefore, impacts regarding consistency and land use compatibility would be less than significant.

e. Cumulative Impacts

Chapter 3.0, General Description of Environmental Setting, provides a list of projects that are planned or are under construction in the Project area. These projects are summarized in **Table 3.1, Related Projects List**, and mapped on **Figure 3-1, Related Projects Map**. As shown, related projects include commercial development projects located within one mile of the Project Site and consist of retail, medical/dental, and restaurant uses.

As discussed above, the Project Site is located within a corridor of light industrial and commercial uses along SR-60 between the SR-57 on the east and the San Gabriel River Freeway (I-605) on the west. The Project would constitute an infill development to include uses consistent with the use, scale, and design of development within the industrial corridor in the northern portion of the Rowland Heights Community. Land uses in the Rowland Heights Community which are of a lower density, such as residential uses located south across SR-60, would not be significantly impacted by the Project.

Related projects are subject to CEQA review and review by County regulatory agencies. Most notably, related projects seeking increases in permitted densities and buildings seeking higher densities than those permitted by the underlying zoning per the LACC are subject to review by the Department of Regional Planning and other County departments for consistency with plan provisions. Projects can only be approved if found to be consistent with adopted plans and zoning regulations. Therefore, no cumulative significant impacts regarding the regulatory framework would result.

The Project is fully consistent with the regulatory framework, and its implementation would not have adverse effects on the implementation of plans and regulations in the Project vicinity. Because related projects would be subject to existing land use and zoning regulations and would not be located within the Project vicinity, cumulative land use impacts would be less than significant. Therefore, the Project would not result in a cumulatively considerable contribution, when considered together with related projects, with respect to compliance with plans and regulatory provisions.

4. MITIGATION MEASURES

The Project would not result in significant impacts associated with consistency with regulatory land use plans and guidelines. Therefore, no mitigation measures would be required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project does not have significant impacts prior to mitigation. Therefore, no mitigation measures are required.

4.I NOISE

1. INTRODUCTION

The section analyzes the potential noise and vibration impacts that would result from the Project. The analysis describes the existing noise environment within the Project area, estimates future noise and vibration levels at surrounding land uses resulting from Project construction and operation, identifies the potential for significant impacts, and provides mitigation measures to address significant impacts. In addition, an evaluation of the potential cumulative noise impacts of the Project and related projects is also provided. Technical data supporting this analysis are provided in Appendix G of this Draft EIR.

a. Noise and Vibration Basics

(1) Noise

Noise is most often defined as unwanted sound. Although sound can be easily measured, the perceptibility of sound is subjective, and the physical response to sound complicates the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” Sound pressure magnitude is measured and quantified using a logarithmic ratio of pressures, the scale of which gives the level of sound in decibels (dB). The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate this human, frequency-dependent response, the A-weighted filter system is used to adjust measured sound levels. The A-weighted sound level is expressed in “dBA.” This scale de-emphasizes low frequencies to which human hearing is less sensitive and focuses on mid- to high-range frequencies. The range of human hearing is approximately 3 to 140 dBA, with 110 dBA considered intolerable or painful to the human ear. A comparison of types of commonly experienced environmental noise is provided in **Figure 4.I-1, Common Noise Levels**.

Although the A-weighted scale accounts for the range of people’s response and therefore, is commonly used to quantify individual event or general community sound levels, the degree of annoyance or other response effects also depends on several other perceptibility factors. These factors include:

- Ambient (background) sound level;
- Magnitude of sound event with respect to the background noise level;
- Duration of the sound event;
- Number of event occurrences and their repetitiveness; and
- Time of day that the event occurs.

People judge the relative magnitude of sound sensation by subjective terms such as “loudness” or “noisiness.” That is, in a noncontrolled environment a change in sound level of 3 dB is considered “just perceptible,” a

change in sound level of 5 dB is considered “clearly noticeable”, and a change in 10 dB is recognized as “twice as loud”.¹

In an outdoor environment, sound levels attenuate (die down) through the air as a function of distance. Such attenuation is called “distance loss” or “geometric spreading” and is based on the source configuration, point source or line source. For a point source, the rate of sound attenuation is, usually, 6 dB per doubling of distance from the noise source. For example, a sound level of 50 dBA at a distance of 25 feet from the noise source would attenuate to 44 dBA at a distance of 50 feet. For a line source, such as a constant flow of traffic on a roadway, the rate of sound attenuation is 3 dB per doubling of distance.² In addition, structures (e.g., buildings and solid walls) and natural topography (e.g., hills) that obstruct the line-of-sight between a noise source and a receptor further reduce the noise level if the receptor is located within the “shadow” of the obstruction, such as behind a sound wall. This type of sound attenuation is known as “barrier insertion loss.” If a receptor is located behind the wall but still has a view of the source (i.e., line-of-sight not fully blocked), some barrier insertion loss would still occur, however to a lesser extent. Additionally, a receptor located on the same side of the wall as a noise source may actually experience an increase in the perceived noise level as the wall reflects noise back to the receptor, thereby compounding the noise. Noise barriers can provide noise level reductions ranging from approximately 5 dBA (where the barrier just breaks the line-of-sight between the source and receiver) to an upper range of 20 dBA with a more substantial barrier.³

Community noise levels usually change continuously during the day. The equivalent sound level (L_{eq}) is normally used to describe community noise. The L_{eq} is the equivalent steady-state A-weighted sound level that would contain the same acoustical energy as the time-varying A-weighted sound level during the same time interval. For intermittent noise sources, the maximum noise level (L_{max}) is normally used to represent the maximum noise level measured during the measurement. Maximum and minimum noise levels, as compared to the L_{eq} , are a function of the characteristics of the noise source. As an example, sources such as generators have maximum and minimum noise levels that are similar to L_{eq} since noise levels for steady-state noise sources do not substantially fluctuate. However, as another example, vehicular noise levels along local roadways result in substantially different minimum and maximum noise levels when compared to the L_{eq} since noise levels fluctuate during pass-by events. The Los Angeles County Code (LACC) Noise Control Ordinance uses the L_{eq} for evaluation of noise violation.

To assess noise levels over a given 24-hour time period, the Community Noise Equivalent Level (CNEL) descriptor is used in land use planning. CNEL is the time average of all A-weighted sound levels for a 24-hour period with a 10 dBA adjustment (upward) added to the sound levels which occur in the night (10:00 P.M. to 7:00 A.M.) and a 5 dBA adjustment (upward) added to the sound levels which occur in the evening (7:00 P.M. to 10:00 P.M.). These penalties attempt to account for increased human sensitivity to noise during the quieter nighttime periods, particularly where sleep is the most probable activity. CNEL has been adopted by the State of California to define the community noise environment for development of a community noise element of a General Plan and is also used by the County.⁴

¹ Bies, David A., and Hansen, Colin H., *Engineering Noise Control*, 1988.

² California Department of Transportation, *Technical Noise Supplement (TeNS)*, September 2013.

³ *Ibid.*

⁴ State of California, Governor’s Office of Planning and Research, *General Plan Guidelines*, 2002.

Noise Level (dBA)	Common Indoor Noise Levels	Common Outdoor Noise Levels
110	Rock Band	
		Jet Flyover @ 1,000 feet
100	Inside Subway Train	Gas Lawn Mower @ 3 feet Diesel Truck @ 50 feet
90	Food Blender @ 3 feet Garbage Disposal @ 3 feet	Noisy Urban Daytime
80	Shouting @ 3 feet	
		Gas Lawn Mower @ 100 feet
70	Vacuum Cleaner @ 10 feet	Commercial Area
		Heavy Traffic @ 300 feet
60	Normal Speech @ 3 feet Large Business Office	
50	Dishwasher next room	Quiet Urban Daytime
		Quiet Urban Nighttime
40	Small Theater/Conference Room (background)	Quiet Suburban Nighttime
30	Library Bedroom at Night	
		Quiet Rural Nighttime
20	Concert Hall (background) Broadcast & Recording Studio	
10		
0	Threshold of Hearing	



Common Noise Levels

Rowland Heights Plaza and Hotel Project

Source: Caltrans Noise Manual, California Department of Transportation, 1980.

FIGURE

4.1-1

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(2) Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. The response of humans, buildings, and equipment to vibration is more accurately described using velocity or acceleration.⁵ Vibration amplitudes are usually described as either peak, as in peak particle velocity (PPV) or root-mean-square (RMS). The peak level represents the maximum instantaneous peak of the vibration signal and the RMS represents the average of the squared amplitude of the vibration signal. In addition, vibrations can be measured in the vertical, horizontal longitudinal, or horizontal transverse directions. Ground vibrations are most often greatest in the vertical direction.⁶ Therefore, the analysis of ground-borne vibration associated with the Project is addressed in the vertical direction. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Man-made vibration issues are therefore usually confined to short distances (i.e., 50 feet or less) from the source.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Noise-Sensitive Receptor Locations

Some land uses are considered more sensitive to noise than others due to the amount of noise exposure and the types of activities typically conducted at the receptor location. The LACC Noise Control ordinance defines noise-sensitive zones as those having residential or semi-residential/commercial land uses, as well as zones designated by the Director of the County's Department of Health Services, provided that conspicuous signs are displayed near the institution or facility. Existing noise-sensitive uses within 500 feet of the Project Site include the following:

- Hotel: Best Western Plus Executive Inn located approximately 90 feet south of the Project Site, across Gale Avenue.
- Single-Family Residential Areas: The nearest residential uses, the Rowland Heights Mobile Estates mobile home park, are located approximately 300 feet to the south of the Project Site, and separated from the site by the Pomona Freeway (SR-60). Single-family residential neighborhoods are also located a minimum of 300 feet southwest of the site, accessed from Colima Road.

(2) Ambient Noise Levels

The predominant noise source influencing the noise environment on the Project Site is roadway noise from Gale Avenue, immediately south of the Project Site; SR-60, between 75 and 300 feet south of the Project Site; and the Metrolink/UPRR railroad tracks immediately to the north. Secondary noise sources include general commercial-related activities to the east, west, and north of the Site, such as loading dock/delivery truck activities, trash compaction, and refuse service activities.

⁵ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment, Final Report*, p. 7-3, May 2006.

⁶ California Department of Transportation, *Transportation Related Earthborne Vibrations*, p. 4, February 2002.

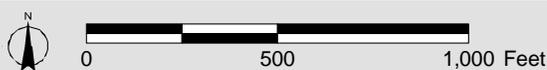
(a) Measured Noise Levels – Existing Conditions

Ambient noise measurements were made at five locations representing the nearby land uses in the Project vicinity, as indicated on **Figure 4.I-2, Noise Measurement Locations**. Long-term measurements were conducted at locations R1 and R2 for three days, and short-term noise measurements were made at locations R3 through R5. Ambient sound measurements were conducted from Monday, June 15 through Wednesday, June 17, 2015 to characterize the existing noise environment during both weekdays and weekends in the Project vicinity.

The ambient noise measurements were conducted using the Larson-Davis 820 Precision Integrated SLM. The microphone was placed at a height of five feet above the local grade at the following locations, as shown in Figure 4.I-2:

- Measurement Location R1: This measurement location represents the existing noise environment at the Project Site's southern boundary along Gale Avenue and, by extension at the Best Western Plus Executive Inn hotel south of the Project Site across Gale Avenue. The noise-measuring device (sound level meter) was placed at the southwest corner of Gale Avenue and the New Charlie Road detour through the Project Site.
- Measurement Location R2: This measurement location represents the existing noise environment on the Project Site. To more fully account for the influence of train operations on the noise environment, the sound level meter was placed on the north side of Railroad Street, approximately 130 feet north of the Site's northern boundary and approximately 100 feet north of the Metrolink/UPRR railroad tracks.
- Measurement Location R3: This measurement location represents the existing noise environment near the single-family residential uses between the Rowland Heights Mobile Estates mobile home park and homes along Greenbay Drive. The sound level meter was placed on the Greenbay Drive cul-de-sac approximately 600 feet east of the southeastern corner of Greenbay Drive and Heatherton Avenue.
- Measurement Location R4: This measurement location represents the existing noise environment at the Motel 6 south of SR-60. The sound level meter was placed at the northwest corner of the Motel 6 parking lot along the SR-60 eastbound off-ramp.
- Measurement Location R5: This measurement location represents the existing noise environment near the single-family residential uses east of Nogales Street and south of SR-60. The sound level meter was placed along the SR-60 eastbound on-ramp behind homes on Custozza Avenue.

A summary of noise measurement data is provided in **Table 4.I-1, Summary of Ambient Noise Measurements**. As shown in Table 4.I-1, the existing ambient noise levels are representative of a noisy built environment (including a major freeway and active rail lines). Specifically, the ambient noise levels at the nearby noise-sensitive receptors—single-family residential areas—exceed the County's presumed ambient noise levels (specified in the LACC Section 12.08.390).



Noise Measurement Locations

Rowland Heights Plaza and Hotel Project
 Source: Google Earth, 2014-04-23 (Aerial); PCR Services Corporation, 2015.

FIGURE

4.1-2

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Table 4.I-1

Summary of Ambient Noise Measurements

Location, Duration, Existing Land Uses and Date of Measurements	Measured Ambient Noise Levels, ^a (dBA)	
	Daytime (7 A.M. to 10 P.M.)	Nighttime (10 P.M. to 7 A.M.)
	Hourly L _{eq}	Hourly L _{eq}
R1		
6/15/15 (Partial 12 hours)/ Monday	65 – 82	62 – 75
6/16/15 (full 24 hours)/ Tuesday	66 – 83	51 – 83
6/17/15 (Partial 9 hours)/ Wednesday	81 – 82	46 – 81
	Average: 79 dBA	Average: 79 dBA
R2		
6/15/15 (Partial 12 hours)/ Monday	69 – 71	67 – 68
6/16/15 (full 24 hours)/ Tuesday	68 – 72	64 – 69
6/17/15 (Partial 11 hours)/ Wednesday	66 – 71	61 – 68
	Average: 71 dBA	Average: 67 dBA
R3		
6/17/15 9 A.M. to 10 A.M. / Wednesday	58	N/A
R4		
6/17/15 9 A.M. to 10 A.M. / Wednesday	66	N/A
R5		
6/17/15 10 A.M. to 11 A.M. / Wednesday	69	N/A

^a Detailed measured noise data, including hourly L_{eq} levels, are included in Appendix G.

Source: PCR Services Corporation, 2015.

(b) Modeled Noise Conditions – Traffic Noise

A traffic model calibration test was performed to establish the noise prediction model's accuracy. The road segments included in the calibration test were 1) Nogales Street between Colima Road and Gale Avenue, and 2) Gale Avenue between the proposed primary Project entrance driveway and Nogales Street. At the noted locations, 15-minute noise recording were made concurrent with logging of actual traffic volumes and auto fleet mix (i.e., standard automobile, medium duty truck, or heavy duty truck). The traffic counts were entered into the noise model along with the observed speed, lane configuration, and distance to the roadway to calculate the traffic noise levels. The results of the traffic noise model calibration are provided in **Table 4.I-2, Traffic Noise Model Calibration Results**. As indicated, the noise model results are within less than 1 dBA of the measured noise levels, which is within the industry standard tolerance of the noise prediction model. Therefore, the Project-specific traffic noise prediction model is considered accurate and reflective of the Project's physical setting.

Because the monitoring data validates the use of a Project-specific traffic noise prediction model, the ambient noise environment of the Project vicinity can be characterized by 24-hour CNEL levels attributable to existing traffic on local roadways to existing traffic on local roadways. CNEL levels for each segment were calculated using a noise prediction model which based on calculation methodologies provided in the Caltrans Technical Noise Supplement (TeNS) document and traffic data provided by the Project traffic

Table 4.I-2

Traffic Noise Model Calibration Results

Road Segment/ Noise Measurements Locations	Traffic Counts during noise readings, 15-minutes			Measured Traffic Noise Levels, L _{eq} (dBA)	Project Traffic Noise Model Predicted Noise Levels, L _{eq} (dBA)	Difference between Predicted and Measured Levels, dBA
	Autos	Medium Trucks ^a	Heavy Trucks ^b			
Nogales Street	363	10	3	69.4	69.0	-0.4
Gale Avenue	97	2	0	61.8	61.5	-0.3

^a Medium Truck – 2 axle trucks based on field observations.

^b Heavy Truck – 3 or more axle trucks and buses based on field observations.

Source: PCR Services Corporation, 2015.

consultant.^{7 8} The roadway noise calculation procedures provided in the Caltrans TeNS are consistent with Federal Highway Administration RD-77-108 roadway noise prediction methodologies. This methodology, considered an industry standard, allows for the definition of roadway configurations, sound barrier characteristics (if any), and receiver locations. The traffic noise prediction model calculates the 24-hour CNEL noise levels based on specific information, including average daily traffic (ADT) volume; percentages of day, evening, and nighttime traffic volumes relative to ADT; and vehicle speed and distance between the noise receptor and the roadway.

As indicated in **Table 4.I-3, Predicted Existing Vehicular Traffic Noise Levels**, the calculated CNEL (at a distance of 25 feet from the roadway right-of-way) from actual existing traffic volumes on the analyzed roadway segments ranged from 64.8 dBA to 71.2 dBA for residential areas and commercial areas.

(3) Vibration-Sensitive Receptor Locations

Typically, ground-borne vibration generated by human activity (i.e., rail and roadway traffic, mechanical equipment and typical construction equipment) diminishes rapidly as the distance from the source of the vibration become greater. The Federal Transit Administration (FTA) uses a screening distance of 100 feet for high vibration-sensitive buildings (e.g., hospital with vibration-sensitive equipment) and 50 feet for residential uses. When vibration-sensitive uses are located within those distances from a project site, vibration impact analysis is required. No residential uses are located within 50 feet of the Site or high vibration-sensitive buildings within 100 feet. Adjacent buildings are industrial or commercial land uses with large parking lots that are not sensitive to vibration.

⁷ The roadway noise calculation procedures provided in TeNS are consistent with Federal Highway Administration RD-77-108 "industry standard" roadway noise prediction methodologies.

⁸ Kunzman Associates, Inc., Rowland Heights Plaza Traffic Impact Analysis, May 29, 2015.

Table 4.1-3

Predicted Existing Vehicular Traffic Noise Levels

Roadway Segment	Adjacent Land Use	Existing Noise Exposure Compatibility ^b Category	Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way ^a
			25 Feet
Nogales Street			
South of Colima Road	Residential/ Commercial	Conditionally Acceptable	69.2
North of Colima Road	Residential/ Commercial	Normally Unacceptable	71.0
Between Walnut Drive and Railroad Street	Commercial	Conditionally Acceptable	70.7
Between Railroad Street and San Jose Avenue	Commercial	Conditionally Acceptable	70.5
Between San Jose Avenue and Valley Boulevard	Commercial	Conditionally Acceptable	70.2
Between Valley Boulevard and La Puente Road	Residential/ Commercial	Normally Unacceptable	70.1
Between La Puente Road and Shadow Oak Drive	Residential/ Commercial	Conditionally Acceptable	69.9
Gale Avenue			
Between Nogales Street and primary Project entrance driveway	Commercial	Normally Acceptable	68.1
Between primary Project entrance driveway and Coiner Court	Commercial	Normally Acceptable	67.2
Between Coiner Court and Fullerton Road	Commercial	Normally Acceptable	67.7
Fullerton Road			
South of Colima Road	Residential/ Commercial	Normally Unacceptable	70.2
North of Colima Road	Residential/ Commercial	Normally Unacceptable	71.2
South of Gale Avenue	Commercial	Normally Acceptable	69.6
North of Gale Avenue	Commercial	Normally Acceptable	68.3
Valley Boulevard Loop			
Valley Boulevard Loop	Residential/ Commercial	Normally Acceptable	64.8
Valley Boulevard			
West of Nogales Street	Residential/ Commercial	Conditionally Acceptable	69.3
East of Nogales Street	Residential/ Commercial	Conditionally Acceptable	69.8
Colima Road			
East of Nogales Street	Residential/ Commercial	Normally Unacceptable	70.5

Table 4.I-3 (Continued)

Predicted Existing Vehicular Traffic Noise Levels

Roadway Segment	Adjacent Land Use	Existing Noise Exposure Compatibility ^b Category	Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way ^a
			25 Feet
Between Nogales Street and Fullerton Road	Residential/Commercial	Normally Unacceptable	70.7
West of Fullerton Road	Residential/Commercial	Normally Unacceptable	70.4

^a Calculated based on existing traffic volumes.

^b Based on noise levels at 25 feet distance from the roadway and residential uses if residential uses are shown along roadways.

Source: PCR Services Corporation, 2015.

(4) Ground-Borne Vibration Environment

Based on field observations, the only source of ground-borne vibration in the Project vicinity is vehicular travel (refuse trucks, delivery trucks, and transit buses) on local roadways. According to the FTA technical study “Federal Transit Administration; Transit Noise and Vibration Impacts Assessments,” typical road

Traffic-induced vibration levels are unlikely to be perceptible by people. In part, FTA indicates “it is unusual for vibration from traffic, including buses and trucks, to be perceptible even in location close to major roadways.”⁹ Therefore, FTA published vibration data are utilized in describing the existing ground vibration environment in the Project Site vicinity. As the Project Site is located within 50 feet of a railroad to the north and 100 feet of SR-60 to the south, it is likely the Site is exposed to ground vibration level of 0.004 inches per second PPV. As discussed below, this vibration level is considered below perception threshold of 0.04 inches per second PPV.

b. Regulatory Framework Summary

Many government agencies have established noise standards and guidelines to protect people from potential hearing damage and various other adverse physiological and social effects associated with noise and ground-borne vibration. Policies and/or standards of agencies such as Caltrans and regulations in the LACC would be applicable to the Project. City of Industry standards are not applicable to the Project because the parcel located within the City of Industry is a proposed parking lot and thus not a noise- or vibration-sensitive use.

(1) Federal and State Noise Standards

The State Department of Health Services has established guidelines for community noise compatibility for land use in assessing the compatibility of various land use types with a range of noise levels. CNEL guidelines for specific land uses are classified into four categories: (1) “normally acceptable,” (2)

⁹ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment, Final Report*, Chapter 7, May 2006.

“conditionally acceptable,” (3) “normally unacceptable,” and (4) “clearly unacceptable.” As shown in **Table 4.I-4, Land Use Compatibility for Community Noise**, a CNEL value of 70 dBA is the upper limit of what is considered a “conditionally acceptable” noise environment for hotel uses.

Table 4.I-4

Land Use Compatibility for Community Noise

Land Use	Community Noise Exposure CNEL, dBA			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Single-Family, Duplex, Mobile Homes	50 to 60	55 to 70	70 to 75	Above 70
Multi-Family Homes	50 to 65	60 to 70	70 to 75	Above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 to 70	60 to 70	70 to 80	Above 80
Transient Lodging—Motels, Hotels	50 to 65	60 to 70	70 to 80	Above 80
Auditoriums, Concert Halls, Amphitheaters	—	50 to 70	—	Above 65
Sports Arena, Outdoor Spectator Sports	—	50 to 75	—	Above 70
Playgrounds, Neighborhood Parks	50 to 70	—	67 to 75	Above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 to 75	—	70 to 80	Above 80
Office Buildings, Business and Professional Commercial	50 to 70	67 to 77	Above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50 to 75	70 to 80	Above 75	—

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Office of Noise Control, California Department of Public Health.

(2) Federal and State Ground-Borne Vibration Standards

Caltrans has produced a guidance manual for evaluating potential vibration impacts (“Transportation- and Construction-Induced Vibration Guidance Manual” dated June 2004). The manual provides thresholds for potential impacts on human comfort and damage to buildings, as well as guidance for reducing potential vibration impacts and addressing vibration issues. The manual gathers data from multiple sources, including the FTA. Tables 4, 5, and 6 of the manual provide criteria for identifying potential annoyance from vibration

activity, as measured in inches per second PPV. The values range in value. For example, 0.035 inches per second PPV is identified as a level that is “distinctly” or “barely” perceptible, and 0.08/0.1 is identified as “readily” or “strongly” perceptible. Levels above this range are levels that begin to annoy human beings. Tables 9 through 15 of the manual provide criteria for identifying potential damage to buildings. Again, the values vary greatly depending on assumptions and the types and conditions of buildings considered. Per those guidelines, buildings that are extremely old and fragile can be subject to damage from vibration levels as low as 0.1 inches per second. Generally, the levels for well-constructed, more substantial buildings fall in the range of 1.0 to 2.0 inches per second PPV. Notably, Table 10 of the manual, based on FTA data, provides a conservative estimate for well-constructed buildings of 0.5 inches per second PPV, while Tables 9, 14 and 15 of the manual assign the 0.5 standard to residential structures and some older buildings, and levels of 1.0 to 2.0 inches per second PPV for newer, more substantial, better-engineered buildings.

A technical discussion of construction activity-related vibration is provided in Section 12.2 of FTA publication titled “Transit Noise and Vibration Impacts Assessments,” April 1995. As described therein, a ground-borne vibration level of 0.2 inch-per-second PPV should be considered as damage threshold criterion for structures deemed “fragile,” and a ground-borne vibration level of 0.12 inch-per-second PPV should be considered as damage criterion for structures deemed “extremely fragile,” such as historic buildings.

(3) Los Angeles County General Plan Noise Element

The overall purpose of the Noise Element of a General Plan is to protect people from the harmful and annoying effects of exposure to excessive noise. The Los Angeles County Noise Element focuses on noise issues associated with transportation, including airports, highways, and railroads.

The County has adapted the Table 4.I-4, Land Use Compatibility for Community Noise, to develop the County’s exterior noise standards, discussed below.

(4) Los Angeles County Code

The County of Los Angeles Noise Restrictions are provided in Chapter 12.08, Noise Control of the LACC. Chapter 12.08 provides procedures and criteria for the measurement of the sound level of “offending” noise sources.

The LACC outlines exterior noise standards for four noise zones based on land use type: noise-sensitive areas, residential properties, commercial properties, and industrial properties. The County’s maximum exterior noise standards set forth in LACC Section 12.08.390 are provided in **Table 4.I-5, Los Angeles County Presumed Ambient Noise Levels**. For residential-zoned areas, the presumed ambient noise level is 50 dBA during the daytime and 45 dBA during the nighttime. The following standards are used to evaluate compliance:

- Standard No. 1: Exterior noise cannot exceed levels set forth in Table 4.I-5 for a cumulative period of more than 30 minutes in any hour.
- Standard No. 2: Exterior noise cannot exceed levels set forth in Table 4.I-5 plus 5 dBA for a cumulative period of more than 15 minutes in any hour.
- Standard No. 3: Exterior noise cannot exceed levels set forth in Table 4.I-5 plus 10 dBA for a cumulative period of more than 5 minutes in any hour.

Table 4.I-5

Los Angeles County Presumed Ambient Noise Levels

Noise Zone	Zone	Daytime Hours (7 A.M. to 10 P.M.) dBA (L _{eq})	Nighttime Hours (10 P.M. to 7 A.M.) dBA (L _{eq})
I	Noise-sensitive area	45	45
II	Residential	50	45
III	Commercial	60	55
IV	Industrial	70	70

Source: LACC, Section 12.08.390.

- Standard No. 4: Exterior noise cannot exceed levels set forth in Table 4.I-5 plus 15 dBA for a cumulative period of more than one minute in any hour.
- Standard No. 5: Exterior noise cannot exceed levels set forth in Table 4.I-5 plus 20 dBA at any time.

If ambient noise levels exceed the exterior noise levels in Table 4.I-5, then the aforementioned standards can be adjusted by substituting relevant noise levels in Table 4.I-5 with the following ambient measurements:

- Standard No. 6: Ambient L50, the noise level exceeded 50% of the time over an hour period.
- Standard No. 7: Ambient L25, the noise level exceeded 25% of the time over an hour period.
- Standard No. 8: Ambient L8.3, the noise level exceeded 8.3% of the time over an hour period.
- Standard No. 9: Ambient L1.7, the noise level exceeded 1.7% of the time over an hour period.
- Standard No. 10: Ambient L0, the maximum noise level over an hour period.

LACC Section 12.08.440 prohibits construction between the hours of 7:00 P.M. and 7:00 A.M. and at any time on Sundays or holidays, given that it creates a noise disturbance across a residential or commercial real-property line. **Table 4.I-6, Los Angeles County Permissible Construction Equipment Noise at Receptor**, outlines the maximum noise levels permissible by construction equipment at affected buildings depending on land use. These noise thresholds pertain to two timeframes: daytime hours from 7:00 A.M. to 8:00 P.M. daily (except Sundays and holidays) and nighttime hours from 8:00 P.M. to 7:00 A.M. daily (or all day Sundays and holidays).

The County Noise Ordinance states that noise levels caused by any air-conditioning or refrigeration equipment shall not exceed the levels identified in **Table 4.I-7, County of Los Angeles Residential Air-Conditioning and Refrigeration Equipment Standards**.

The County Noise Ordinance Section 12.08.350 provides a presumed perception threshold of 0.01 inch-per second RMS; however, this applies to ground-borne vibrations from long-term operational activities, such as surface traffic, and not to short-term activities such as construction. Therefore, the 0.01 inch-per second RMS

Table 4.I-6

Los Angeles County Permissible Construction Equipment Noise at Receptor

Equipment Type	Receptor Type	Daytime Hours (7 A.M. to 8 P.M.) dBA (L_{eq})	Nighttime Hours (8 P.M. to 7 A.M.) dBA (L_{eq})
Mobile short-term operation (less than 10 days)	Single-family Residential	75	60
	Multi-family Residential	80	64
	Semiresidential/Commercial Business Structures	85 85	70 85
Stationary long-term operation (more than 10 days)	Single-family Residential	60	50
	Multi-family Residential	65	55
	Semiresidential/Commercial	70	60

Source: LACC, Section 12.08.440.

Table 4.I-7

County of Los Angeles Residential Air-Conditioning and Refrigeration Equipment Standards

Measurement Location	Units Installed Before 1-1-80 dBA	Units Installed On or After 1-1-80 dBA
Any point on neighboring property line, 5 feet above grade level, no closer than 3 feet from any wall.	60	55
Center of neighboring patio, 5 feet above grade level, no closer than 3 feet from any wall.	55	50
Outside the neighboring living area window nearest the equipment location, not more than 3 feet from the window opening, but at least 3 feet from any other surface.	55	50

Source: County of Los Angeles Ordinance, No. 11743, LACC, Section 12.08.530.

vibration criteria is used in connection with the Project's operation-related vibration impacts. The vibration level of 0.01 inch-per second RMS is equivalent to 0.04 inches per second PPV.

3. ENVIRONMENTAL IMPACTS

a. Methodology

(1) On-Site Construction Noise

On-site construction noise impacts were evaluated by determining the noise levels generated by the different types of construction activity, calculating the construction-related noise level at nearby sensitive receptor locations, and comparing these construction-related noise levels to existing ambient noise levels (i.e., noise levels without construction noise). More specifically, the following steps were undertaken to assess construction-period noise impacts.

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table 4.I-1);
2. Typical noise levels for each type of construction equipment were obtained from the Federal Highway Administration (FHWA) roadway construction noise model (RCNM);
3. Distances between construction site locations (noise source) and surrounding sensitive receptors were measured using Project architectural drawings, Google Earth, and site plans;
4. The construction noise level was then calculated, in terms of hourly L_{eq} , for sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance; and
5. Construction noise levels were then compared to the construction noise significance thresholds identified below.

(2) Off-Site Roadway Noise (Construction and Operation)

Roadway noise impacts have been evaluated using the Caltrans TeNS methodology based on the roadway traffic volume data provided in the Traffic Impact Analysis prepared for the Project. This methodology allows for the definition of roadway configurations, barrier information (if any), and receiver locations. Roadway noise attributable to Project development was calculated and compared to baseline noise levels that would occur under the “without Project” condition.

(3) Stationary Point-Source Noise (Operation)

Stationary point-source noise impacts were evaluated by identifying the noise levels generated by outdoor stationary noise sources such as rooftop mechanical equipment and loading dock activities, calculating the hourly L_{eq} noise level from each noise source at surrounding sensitive receiver property line locations, and comparing such noise levels to existing ambient noise levels. More specifically, the following steps were undertaken to calculate outdoor stationary point-source noise impacts:

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table 4.I-1);

2. Distances between stationary noise sources and surrounding sensitive receptor locations were measured using Project architectural drawings, Google Earth, and site plans;
3. Representative source noise levels for outdoor mechanical equipment were selected based on manufacturer's data (if details are known), maximum allowable (if regulated as such), or engineering estimate.
4. Stationary-source noise levels were then calculated for each sensitive receptor location based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance; and
5. Noise level increases were compared to the stationary source noise significance thresholds identified below.

(4) Ground-Borne Vibration (Construction and Operation)

Ground-borne vibration impacts were evaluated by identifying potential vibration sources, measuring the distance between vibration sources and surrounding structure locations, and making a significance determination based on the significance thresholds described below.

b. Thresholds of Significance

The potential for noise impacts is based on thresholds derived from Los Angeles County Department of Regional Planning Initial Study Checklist screening questions, which are based in part on Appendix G of the State *CEQA Guidelines*. These questions are as follows:

13. Noise. Would the project result in:

- a) Exposure of persons to, or generation of, noise levels in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?
- b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, including noise from parking areas?
- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project, including noise from amplified sound systems?
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The Initial Study determined that the Project would have no impact or less than significant impacts with respect to e) projects located within an airport land use plan or within two miles of an airport, and f) projects within the vicinity of a private airstrip. These environmental topics are not evaluated in this EIR.

Significance thresholds have been developed based on these factors and the applicable regulatory requirements, as presented below.

(1) Construction Noise

Since the Project construction period would have a duration of more than 10 days and would not occur between the hours of 7:00 P.M. and 7:00 A.M. Monday through Saturday, or at any time on Sundays and holidays (consistent with provisions of the LACC), noise during construction would have a significant impact if:

NOISE-1 Project construction equipment noise exceeds 60 dBA, L_{eq} at single-family residences and mobile homes; 65 dBA, L_{eq} at multi-family residences; or 70 dBA, L_{eq} at transient lodging.

NOISE-2 Off-site Project construction traffic noise exceeds 75 dBA, L_{eq} at single-family residences and mobile homes; 80 dBA, L_{eq} at multi-family residences; or 85 dBA, L_{eq} at transient lodging.

(2) Operational Noise

Noise during operation would have a significant impact if:

NOISE-3 The Project would cause ambient noise levels to increase by 5 dBA CNEL or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either “normally acceptable” or “conditionally acceptable” (see Table 4.I-4 for description of these categories); or cause ambient noise levels to increase by 3 dBA CNEL or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either “normally unacceptable” or “clearly unacceptable.”; or

NOISE-4 Project-related operational (i.e., non-roadway) noise sources such as outdoor amenity space and building mechanical/electrical equipment exceed ambient noise level, thus causing a violation of the County Noise Ordinance.

In addition, the LACC provides guidance for calculation of short-term annoying sounds of the type that could be generated within a project’s parking structure. Accordingly, the following threshold would apply:

NOISE-5 The maximum noise (L_{max}) generated from the operation of the parking structure (e.g., car alarms) exceeds the average (L_{eq}) ambient noise level by 10 dBA.

Introducing a new noise-sensitive use (hotels) into an existing built environment requires demonstration of conformity to the State’s land use compatibility standards. Specifically, the Project would have a significant impact if:

NOISE-6 The Project's proposed noise-sensitive uses (on-site hotels) are to be located in an existing sound environment which is "Conditionally Unacceptable" without needed noise insulation features incorporated into the design, or "Normally Unacceptable" unless a detailed analysis of the noise reduction requirements is completed and needed noise insulation features are incorporated into the design.

(3) Ground-Borne Vibration

Vibration would have a significant impact if:

NOISE-7 Project construction activities cause ground-borne vibration levels to exceed the applicable building damage threshold of 2 inch-per-second PPV at the nearest commercial buildings.

NOISE-8 Project construction and operation activities cause ground-borne vibration levels to exceed the human annoyance threshold, 0.04-inch-per-second PPV, at nearby sensitive land uses.

c. Project Characteristics or Design Features

All outdoor mechanical building and electrical equipment would be designed to meet the requirements of LACC Ordinance No. 11743, Section 12.08.530. In addition, the following Project Design Features would be implemented to reduce Project-generated noise and were incorporated into analytical assumptions prior to the determination of potential impacts.

PDF-NOISE-1: The Project contractor(s) will equip all construction equipment, fixed and mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards.

PDF-NOISE-2: As required by LACC, an acoustical analysis of the mechanical plans of the proposed buildings will be prepared by a qualified acoustical engineer, prior to issuance of building permits, to ensure that all mechanical equipment would be designed to meet noise limits in Table 4.I-7.

PDF-NOISE-3: As warranted based on ambient CNEL levels at the Project Site, an acoustical analysis of the architectural plans of the proposed hotel buildings will be prepared by a qualified acoustical engineer prior to issuance of building permits to ensure that the building construction and design (i.e., exterior wall, window, and door) would include the required noise insulation features to demonstrate land use compatibility.

d. Project Impacts

(1) Project Construction

(a) On-Site Project Construction Noise

Threshold NOISE-1: A significant impact would occur if Project construction equipment noise exceeds 60 dBA, L_{eq} at single-family residences; 65 dBA, L_{eq} at multi-family residences; or 70 dBA, L_{eq} at transient lodging.

Impact Statement NOISE-1: *On-site construction noise associated with the Project would exceed the established thresholds at nearby noise-sensitive receptor locations. Therefore, impacts would be significant.*

Noise impacts from construction activities are generally a function of the noise generated by construction equipment, equipment proximity, the sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Individual construction phases will typically be undertaken in four stages: 1) site preparation; 2) grading; 3) building foundation; 4) concrete pour; 5) building construction; 6) paving; and 7) finishes. Each stage involves the use of different kinds of construction equipment and therefore, has its own distinct noise characteristics. Site preparation typically involves the use of rubber-tired dozers and tractors/loaders/backhoes. Grading typically involves the use of excavators, graders, and tractors/loaders/backhoes. Building foundation typically involves the use of drill rig trucks, cranes, excavators, and tractors/loaders/backhoes. Concrete pour typically involves the use of concrete pump trucks, concrete mixer trucks, and tractors/loaders/backhoes. Building construction typically involves the use of cranes (mobile and tower), forklifts, air compressors, and tractors/loaders/backhoes. Paving typically involves the use of pavers and rollers. Finishes typically involves the use of air compressors and aerial lifts.

The Project would be constructed using typical construction techniques; no blasting or impact pile driving would be used. As discussed in Chapter 2.0, Project Description, of this Draft EIR, construction is anticipated to commence in mid-2017.

Project construction would require the use of mobile heavy equipment with high noise level characteristics. Individual pieces of construction equipment to be used for Project construction produce maximum noise levels of 75 dBA to 85 dBA at a reference distance of 50 feet from the noise source, as shown in **Table 4.I-8, Construction Equipment Noise Levels**. These maximum noise levels would occur when equipment is operating under full power conditions. However, equipment used on construction sites often operate under less than full power conditions or part power as shown in the second column in Table 4.I-8. As shown in Table 4.I-8, the part power percentage of construction equipment is based on the Construction Noise Control Specification developed for the Central Artery/Tunnel project in Boston, the largest urban construction project ever conducted in the United States.¹⁰ To more accurately characterize construction-period noise levels, the average (hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage and are typically attributable to multiple pieces of equipment operating simultaneously.

¹⁰ Federal Highway Administration, *Roadway Construction Noise Model User's Guide*, 2006.

Table 4.I-8

Construction Equipment Noise Levels

Equipment	Estimated Usage Factor, %	Typical Noise Level at 50 feet from Equipment, dBA (L_{max})
Air Compressor	50	78
Air Lift	20	75
Concrete Mixer Truck	40	79
Concrete Pump Truck	20	81
Cranes (Mobile and Tower)	40	81
Drill Rig Truck	20	79
Excavator	40	81
Forklift	10	75
Grader	40	85
Paver	50	77
Roller	20	80
Rubber Tired Dozer	40	82
Tractor/Loader/Backhoe	25	80

Source: FHWA Roadway Construction Noise Model User's Guide, 2006.

Construction noise levels were estimated based on an industry standard sound attenuation rate of 6 dB per doubling of distance for point sources (e.g., construction equipment). Within the analysis, all construction equipment was assumed to operate simultaneously at the construction area nearest to potentially affected residential receptors. These assumptions represent a worst-case noise scenario, as construction activities routinely would be spread throughout the construction site. In addition, noise from different construction stages which have the potential to occur simultaneously were added together to provide a composite construction noise level. A summary of the construction noise impacts at the nearby sensitive receptors is provided in **Table 4.I-9, Estimate of Construction Noise Levels (L_{eq}) at Off-Site Sensitive Receiver Locations**. Detailed noise calculations for construction activities are provided in Appendix G of this EIR.

As shown in Table 4.I-9, construction noise levels would exceed the significance threshold for hotel uses (R1). Construction-period noise impacts would be significant at the nearby Best Western Plus Executive Inn hotel (Location R1) without incorporation of mitigation measures.

Project construction would occur in two major phases: 1) buildout of Parcel 1, the Commercial Center, and the full-service Hotel A (Phase 1) and associated subterranean parking, and 2) subsequent buildout of Parcel 3, the extended-stay Hotel B and associated subterranean parking (Phase 2). The site for Hotel B would be developed during Phase 1 for use for temporary surface parking, as desired or demonstrated by need, until Phase 2 construction commences. The extended-stay Hotel B site is approximately 400 feet away from the Best Western hotel and construction noise levels associated with extended-stay Hotel B would be 20 dBA lower than construction noise from the Phase 1 construction site; therefore construction of the extended-stay Hotel B would not increase the construction noise levels experienced at the off-site Best Western Plus Executive Inn hotel (Location R1).

Table 4.1-9

**Estimate of Construction Noise Levels (L_{eq})
at Off-Site Sensitive Receiver Locations**

Noise Sensitive Receptor	Construction Phases	Nearest Distance between Receptor and Construction Site, feet	Estimated Construction Noise Levels at the Noise Sensitive Receptor by Construction Phase, ^a		Project's Significance Threshold (dBA)	Exceeds Significance threshold?
			Hourly L_{eq} (dBA)			
R1 Motel	Site Preparation	90	74		70	Yes
	Grading	90	78			Yes
	Building Foundation	90	76			Yes
	Concrete Pour	90	74			Yes
	Building Construction	90	75			Yes
	Paving	90	74			Yes
	Finishes	90	77			Yes
R3 ^b Single-Family Residential Uses	Site Preparation	300	54		60	No
	Grading	300	57			No
	Building Foundation	300	56			No
	Concrete Pour	300	54			No
	Building Construction	300	55			No
	Paving	300	54			No
	Finishes	300	50			No
R4 ^b Motel Uses	Site Preparation	830	45		70	No
	Grading	830	49			No
	Building Foundation	830	47			No
	Concrete Pour	830	45			No
	Building Construction	830	46			No
	Paving	830	45			No
	Finishes	830	41			No
R5 ^b Single-Family Residential Uses	Site Preparation	1180	42		60	No
	Grading	1180	46			No
	Building Foundation	1180	44			No
	Concrete Pour	1180	42			No
	Building Construction	1180	43			No
	Paving	1180	42			No
	Finishes	1180	38			No

^a Estimated construction noise levels represent the worst-case condition when noise generators are located closest to the receptors and are expected to last the entire construction duration.

^b Receptors are fully shielded from the construction site by existing off-site buildings.

Source: PCR Services Corporation, 2015

(b) Off-Site Project Construction Noise

Threshold NOISE-2 A significant impact would occur if off-site Project construction traffic noise exceeds 75 dBA, L_{eq} at single-family residences and mobile homes; 80 dBA, L_{eq} at multi-family residences; or 85 dBA, L_{eq} at transient lodging.

Impact Statement NOISE-2: *Off-site construction traffic would not exceed the established thresholds at nearby noise-sensitive receptor locations. Therefore, impacts would be less than significant.*

Material delivery truck trips would occur throughout the construction period. Truck haul routes would comply with approved truck routes designated by the County. Outbound traffic would travel eastbound on Gale Avenue to SR-60 via Nogales Street, and inbound traffic would exit SR-60 using the Nogales Street exit, then travel west on Gale Avenue. There would be a maximum of approximately 33 haul truck trips per day. The truck trips would generate noise levels of approximately 39 dBA, L_{eq} at 25 feet distance along Gale Avenue. Off-site haul truck trip would not exceed the 85 dBA significance threshold for transient lodging. Therefore, impacts would be less than significant.

(2) Project Operation

(a) Operational Noise

Threshold NOISE-3: A significant impact would occur if the Project would cause ambient noise levels to increase by 5 dBA CNEL or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either “normally acceptable” or “conditionally acceptable” (see Table 4.I-4 for description of these categories); or cause ambient noise levels to increase by 3 dBA CNEL or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either “normally unacceptable” or “clearly unacceptable.”

Impact Statement NOISE-3: *Project implementation would increase noise levels at adjacent noise-sensitive receptors in the Project area. However, Project-related noise would not exceed established thresholds; therefore, impacts would be less than significant.*

Future roadway noise levels were calculated along various arterial segments adjacent to the Project. Roadway noise attributable to Project development was calculated using the traffic noise model previously described and compared to baseline noise levels that would occur under the “No Project” condition.

For existing conditions, as shown in **Table 4.I-10, Off-Site Operational Traffic Noise Impacts**, the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 1.7 dBA, which would occur along Gale Avenue, between Nogales Street and the proposed primary entrance driveway.

For future Project buildout, the maximum Project-related noise increase of 1.7 dBA would also occur along Gale Avenue, between Nogales Street and the Project’s proposed primary entrance driveway. As these increases fall well below the 5 dBA CNEL significance threshold, roadway noise level increases would be less than significant.

Table 4.I-10

Off-Site Operational Traffic Noise Impacts

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA) With Sunset and Havenhurst Signal Option						Cumulative Increment ^f (D – A)
	Existing (A)	Existing with Project ^a (B)	Future No Project ^b (C)	Future with Project ^c (D)	Existing Project Increment ^d (B-A)	Future Project Increment ^e (D – C)	
Nogales Street							
South of Colima Road	69.2	69.3	69.2	69.4	0.1	0.2	0.2
North of Colima Road	71.0	71.3	71.0	71.3	0.3	0.3	0.3
Between Walnut Drive and Railroad Street	70.7	71.2	70.7	71.2	0.5	0.5	0.5
Between Railroad Street and San Jose Avenue	70.5	71.0	70.5	71.0	0.5	0.5	0.5
Between San Jose Avenue and Valley Boulevard	70.2	70.7	70.2	70.7	0.5	0.5	0.5
Between Valley Boulevard and La Puente Road	70.1	70.5	70.1	70.5	0.4	0.4	0.4
Between Valley La Puente Road and Shadow Oak Drive	69.9	70.3	69.9	70.3	0.4	0.4	0.4
Gale Avenue							
Between Nogales Street and primary Project entrance driveway	68.1	69.8	68.1	69.8	1.7	1.7	1.7
Between primary Project entrance driveway and Coiner Court	67.2	68.5	67.2	68.5	1.3	1.3	1.3
Between Coiner Court and Fullerton Road	67.7	69.0	67.7	69.0	1.3	1.3	1.3
Fullerton Road							
South of Colima Road	70.2	70.4	70.2	70.4	0.2	0.2	0.2
North of Colima Road	71.2	71.4	71.2	71.5	0.2	0.3	0.3
South of Gale Avenue	69.6	70.3	69.7	70.3	0.7	0.6	0.7
North of Gale Avenue	68.3	68.5	68.4	68.5	0.2	0.1	0.2
Valley Boulevard Loop							
Valley Boulevard Loop	64.8	65.4	64.8	65.4	0.6	0.6	0.6
Valley Boulevard							
West of Nogales Street	69.3	69.4	69.3	69.4	0.1	0.1	0.1
East of Nogales Street	69.8	69.9	69.8	69.9	0.1	0.1	0.1

Table 4.I-10 (Continued)

Off-Site Operational Traffic Noise Impacts

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA) With Sunset and Havenhurst Signal Option						Cumulative Increment ^f (D – A)
	Existing (A)	Existing with Project ^a (B)	Future No Project ^b (C)	Future with Project ^c (D)	Existing Project Increment ^d (B-A)	Future Project Increment ^e (D – C)	
Colima Road							
East of Nogales Street	70.5	70.6	70.5	70.6	0.1	0.1	0.1
Between Nogales Street and Fullerton Road	70.7	70.8	70.8	70.9	0.1	0.1	0.2
West of Fullerton Road	70.4	70.5	70.4	70.5	0.1	0.1	0.1

^a Include existing plus Project traffic.

^b Include future growth plus related (cumulative) projects identified in the traffic study.

^c Include future growth plus related (cumulative) projects and Project traffic.

^d Increase due to Project-related traffic only at existing.

^e Increase due to Project-related traffic only at Project build-out.

^f Increase due to future growth, related (cumulative) projects, and Project traffic.

Source: PCR Services Corporation, 2015.

Threshold NOISE-4: A significant impact would occur if Project-related operational (i.e., non-roadway) noise sources such as outdoor amenity space and building mechanical/electrical equipment, etc. exceed ambient noise levels, causing a violation of the County Noise Ordinance.

Threshold NOISE-5: A significant impact would occur if the maximum noise (L_{max}) generated from the operation of the parking structure (e.g., car alarms) exceeds the average (L_{eq}) ambient noise level by 10 dBA.

Impact Statement NOISE-4: Outdoor activities, operation of building mechanical/electrical equipment, etc. would not exceed noise levels at adjacent noise-sensitive receptors in the Project vicinity. Therefore, impacts would be less than significant with implementation of PDF-NOISE-2.

Impact Statement NOISE-5: Operation of the parking structure would not exceed noise levels at adjacent noise-sensitive receptors in the Project area. Therefore, impacts in this regard would be less than significant.

(i) Fixed Mechanical Equipment

The operation of mechanical equipment such as air conditioners, fans, and related equipment may generate audible noise levels. These types of equipment would be used on the Project Site. Mechanical equipment would typically be located on rooftops or within buildings, shielded from nearby land uses to attenuate noise and avoid conflicts with adjacent uses. In addition, to ensure compliance with noise limitation requirements of the LACC shown in Table 4.I-7, PDF-NOISE-2 requires an acoustical analysis of the mechanical plans of the proposed building so that all mechanical equipment would be designed with appropriate noise control

devices, such as sound attenuators, acoustics louvers, or sound screen/ parapet walls. Therefore, operation of mechanical equipment would not exceed the Project thresholds of significance and impacts would be less than significant.

(ii) Open Spaces

To enhance the pedestrian environment and in response to community input, proposed open space and landscape amenities on Parcel 1 would include a centrally located common area that includes seating, a water feature, landscaping, and a historically themed gathering area. The central east-west drive aisle on Parcel 1 and the joint Hotel A/Hotel B entry plaza would feature enhanced paving and landscaping. The Project would include outdoor pools and lounge areas in the western portion of the Project Site associated with Hotel A and Hotel B. The common area and pool/lounge areas would be surrounded by the proposed buildings. In addition, because of its orientation and distance from noise-sensitive uses to the south, noise associated with the use of open spaces would be less than significant.

(iii) Loading Dock Areas

Loading facilities for Parcel 1 would be located on the Project Site and at grade. Loading facilities would be provided west of Building No. 1, northwest of Building No. 2, north of Building No. 3, and southwest of Building No. 4, and would be accessed via the surface parking lot or drive aisles surrounding the parcel. On Parcels 2 and 3, separate loading facilities would be provided on the western sides of each hotel and would be accessed from the drive aisle on the western edge of the Project Site.

Loading dock-related activities such as truck movements/idling and loading/unloading operations would generate noise levels that have a potential to adversely impact adjacent land uses during long-term Project operations. Based on measured noise levels, delivery trucks (at loading dock) would generate noise levels of approximately 71 dBA (L_{eq}) at a 50-foot distance.

The nearest noise-sensitive use, the Best Western Plus Executive Inn hotel (Location R1), is approximately 100 feet south of the proposed loading dock area for Building No. 4. Based on a noise level source strength of 71 dBA at a reference distance of 50 feet, loading dock noise would be 65 dBA at the off-site hotel and would not exceed the current daytime average ambient noise level of 79 dBA at the Best Western Plus Executive Inn hotel (Location R1). As this would not cause the existing daytime ambient noise level of 79 dBA to increase by the 5 dBA significance criterion, impacts to surrounding uses would be less than significant.

(iv) Parking Areas

Local access to the Project Site is provided by Gale Avenue, a two- to four-lane roadway that provides access between Nogales Street to the east and Fullerton Road to the west. The driveway would provide access to the at-grade and subterranean parking levels. Noise associated with activities from at-grade parking areas can have off-site impacts. Automobile movements in parking areas comprise the most continuous noise source and generate a noise level of approximately 65 dBA at a distance of 25 feet. Car alarm and horn noise events generate sound levels as high as 83 dBA at a reference distance of 25 feet.¹¹

¹¹ Noise measurements conducted for a moving automobile in a parking lot, PCR, May 1998.

The nearest hotel use, the Best Western Plus Executive Inn (Location R1) along Gale Avenue, is approximately 100 feet from the parking areas along Gale Avenue. Based on a noise level source strength of 83 dBA at a reference distance of 25 feet, and accounting for distance attenuation (minimum 12 dBA insertion loss), parking-related noise would be reduced to 71 dBA at 100 feet from the at-grade parking areas. Car alarm and horn related noise from the parking structure would not exceed the nighttime average noise level of 79 dBA by 10 dBA at R1. Therefore, impacts would be less than significant.

(v) Composite Noise Level Impacts from Project Operations

An evaluation of noise from all Project noise sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum Project-related noise level increase that may occur at the noise-sensitive receptor locations included in this analysis. The overall sound environment at the areas surrounding the Project is comprised of contributions from each individual noise source associated with the typical daily operation of the Project. Primary noise sources associated with the Project would include traffic on nearby roadways, on-site mechanical equipment, on-site loading dock areas, and parking areas/structures.

Based on a review of the noise-sensitive receptors and the Project noise sources, the only noise-sensitive location where composite noise impacts could occur is at the Best Western Plus Executive Inn hotel (Location R1). Due to a combination of distance and the presence of intervening structures that would serve as noise barriers, the predominant Project noise source that could potentially affect the other noise-sensitive locations is roadway noise.

Based on the traffic noise analysis above, Project-generated traffic is expected to increase the traffic-related noise by a maximum of 1.7 dBA (CNEL) along Gale Avenue, between Nogales Street and the primary Project entrance driveway, which is represented by the receptor R1. Noise associated with activities in parking areas and at the loading docks would not increase the overall ambient noise levels in the Project vicinity. Noise from mechanical equipment is expected to be at least 10 dBA below the ambient noise levels and under Project Design Feature PDF-NOISE-2, would be designed to meet noise limits in Table 4.I-7. According to industry engineering references, a 10 dB difference between two noise sources results in an increase of less than 1.0 dBA to the composite noise level of the two sources.¹² Thus, mechanical equipment-related operational noise from the Project would result in an increase of less than 1.0 dBA over ambient noise levels. Overall, relative to the existing noise environment, the Project is estimated to increase the ambient noise level at the nearest noise-sensitive receptors (the off-site hotel at Location R1) by less than 3 dBA, which is a less than significant margin. Composite noise level increases at all other receptor locations are expected to be less than significant as well, given their distance from the Project Site and the presence of intervening structures. As such, the composite noise level impact due to the Project's future operations would be less than significant.

¹² Bies, David A., and Hansen, Colin H., *Engineering Noise Control*, 1988.

(b) Site Compatibility (Proposed On-Site Noise Sensitive Uses)

Threshold NOISE-6: A significant impact would occur if the Project's proposed noise-sensitive uses (on-site hotels) are to be located in an existing sound environment which is "Conditionally Unacceptable" without needed noise insulation features incorporated into the design, or "Normally Unacceptable" unless a detailed analysis of the noise reduction requirements is completed and needed noise insulation features are incorporated into the design.

Impact Statement NOISE-6: *Although the existing noise environment is deemed "normally unacceptable" based on the State's Land Use Compatibility for Community Noise, proposed hotel uses would not be significantly impacted with implementation of the Project Design Feature PDF-NOISE-3.*

The Project would locate hotel units, which are considered new noise-sensitive uses, on the site. As indicated by the noise measurement data presented in Table 4.I-1, the proposed hotel uses would be exposed to exterior noise levels that currently exceed the State's land use compatibility standard of 70 dBA CNEL for transit lodging uses, resulted in a normally unacceptable condition. Therefore, noise insulation features should be included in the design of the hotels. Incorporation of the Project Design Feature PDF-NOISE-3 described above would reduce interior noise levels to acceptable levels (generally considered 45 dBA CNEL at the interior of the transit lodging units). These could include such strategies as enhanced noise insulation rating on windows, doors, and exterior walls. Use of these features would reduce potential impacts associated with the introduction of the hotels to a less than significant level.

(3) Vibration

Threshold NOISE-7: A significant impact would occur if Project construction activities cause ground-borne vibration levels to exceed the applicable building damage threshold of 2 inch-per-second PPV at the nearest buildings.

Impact Statement NOISE-7: *Construction activities would result in sporadic, temporary vibration effects adjacent to the Project area, which would not exceed established thresholds. Thus, construction vibration impacts would be less than significant.*

Construction activities can generate varying degrees of ground vibration depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibration from construction activities rarely reach levels that damage structures. The FTA has published standard vibration velocities for construction equipment operations. The PPV for construction equipment pieces anticipated to be used during Project construction are listed in **Table 4.I-11, Typical Vibration Velocities for the Project Construction Equipment.**

Table 4.I-11

Typical Vibration Velocities for the Project Construction Equipment

Equipment	Reference Vibration Velocity Levels at 25 ft,
	inch/second PPV ^{a,b}
Large bulldozer	0.089
Loaded trucks	0.076

^a PPV = Peak particle velocity.

^b FTA's "Transit Noise and Vibration Impact Assessment", Table 12-2.

Source: USDOT Federal Transit Administration, 2005.

Project construction would generate ground-borne construction vibration during demolition, shoring and excavation, and large bulldozer operation. Based on the vibration data provided in Table 4.I-11, vibration velocities from operation of construction equipment would range from approximately 0.076 to 0.089 inches per second PPV at 25 feet from the source of activity. The nearest off-site structures are commercial buildings located approximately 16 feet west of the construction site, which would be exposed to vibration velocities ranging approximately from 0.0684 to 0.1738 inches per second PPV. As this value is considerably lower than the 2.0 inches per second PPV significance threshold regarding potential building damage for commercial buildings, vibration impacts associated with construction would be less than significant at the nearest building.

Threshold NOISE-8: A significant impact would occur if Project construction and operation activities cause ground-borne vibration levels to exceed the human annoyance threshold, 0.04-inch-per-second PPV, at nearby sensitive land uses.

Impact Statement NOISE-8: Project implementation would not generate excessive vibration levels to nearby sensitive receptors. Thus, construction and operation vibration impacts would be less than significant.

The nearest vibration-sensitive building is the Best Western Plus Executive Inn hotel (Location R1) approximately 100 feet south of the construction site; this use would be exposed to vibration velocities up to 0.0111 inches per second PPV. As this value is lower than the 0.04 inches per second PPV significance threshold for human perception, vibration impacts associated with construction would be less than significant at the nearest vibration-sensitive uses (R1).

The Project would include typical commercial-grade stationary mechanical and electrical equipment such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the parking area activity. Ground-borne vibration generated by each of the above-mentioned activities would be similar to existing sources (i.e., traffic on adjacent roadways) adjacent to the Project Site. Maximum potential vibration levels from all Project operational sources at the closest off-site buildings would be up to 0.01 inches per

second PPV¹³, less than the significance threshold of 0.04 inches per second PPV for perceptibility. As such, vibration impacts associated with operation of the Project would be below the significance threshold, and impacts would be less than significant.

e. Cumulative Impacts

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and sound reduces significantly in magnitude as the distance from the source increases. As such, only projects expected to occur in the immediate Project area likely would contribute to cumulative noise impacts.

As discussed in Chapter 3.0, General Description of Environmental Setting, there are three related projects in the surrounding area. The closest related project is approximately 2,000 feet from the Project Site – Related Project No. 3 – 1370 Fullerton Road, retail, office, and restaurant uses. All other related projects are at least 2,500 feet away from the Project Site. The potential for noise impacts to occur are specific to the location of each related project, as well as the cumulative traffic on the surrounding roadway network.

(1) Construction Noise

Noise from construction of the Project and related projects would be localized, thereby potentially affecting areas immediately within 500 feet from either/both construction sites. Due to distance attenuation (more than 2,000 feet away) and intervening structures, construction noise from one site would not result in a noticeable increase in noise at sensitive receptors near the other site, which would preclude a cumulative noise impact. As such, cumulative impacts associated with construction noise would be less than significant.

(2) Operational Noise

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project and other projects in the Project vicinity. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the Project to the future cumulative base traffic volumes in the Project vicinity. The noise levels associated with cumulative base traffic volumes without the Project and cumulative base traffic volumes with the Project are identified in Table 4.I-10. Noise level increases in the Project vicinity would reach a maximum of 1.7 dBA CNEL along Gale Avenue, between Nogales Street the primary Project entrance driveway, which would not exceed the Project's 3 dBA significance threshold. Therefore, with respect to roadway noise, there is no potential for the Project to result in a cumulatively considerable contribution when considered together with related project traffic volumes.

Due to LACC provisions that limit stationary-source noise from items such as roof-top mechanical equipment, noise levels would be less than significant at the property line for each related project. For this reason, on-site noise produced by any related project would not be additive to Project-related noise levels. As the Project's composite stationary-source impacts would be less than significant, composite stationary-source noise impacts attributable to cumulative development would also be less than significant.

¹³ California Department of Transportation, *Transportation Related Earthborne Vibrations*, February 2002.

(3) Ground-Borne Vibration

Due to the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the Project, there is no potential for the Project to result in a cumulatively considerable contribution, when considered together with the related projects, to cumulatively significant construction-related or operational impacts.

4. MITIGATION MEASURES

The following mitigation measure is required to reduce potential significant Project construction noise impacts to a less than significant level.

a. Project Construction Noise and Vibration

(1) Noise

Construction-related noise has the potential to result in significant noise impacts at sensitive receptors. The following mitigation measure is required to minimize construction-related noise impacts:

MM-NOISE-1: A temporary noise barrier shall be used to block the line-of-sight between construction equipment and the Best Western Plus Executive Inn hotel to the south across Gale Avenue (Location R1) during Project construction. The noise barrier shall be at least 12 feet tall with noise blankets capable of achieving sound level reductions of at least 9 dBA and placed along the southern boundary of active Project construction sites to reduce construction noise at the hotel, and may be combined with security fencing.

(2) Vibration

The Project would result in less than significant construction vibration impacts, and no mitigation measures are necessary.

b. Project Operational Noise and Vibration

(1) Noise

The Project would result in less than significant operational noise impacts, and no mitigation measures are necessary.

(2) Vibration

The Project would result in less than significant operational vibration impacts, and no mitigation measures are necessary.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

a. Construction

The temporary sound barrier prescribed by Mitigation Measure MM-NOISE-1 would achieve a noise reduction of 10 dBA or more in areas by obstructing the line-of-sight between construction-related noise

sources and Location R1, the off-site Best Western Plus Executive Inn hotel receptor to the south across Gale Avenue. Therefore, the maximum construction-period L_{eq} would be reduced to below the 70 dBA significance thresholds at Location R1. Compliance measures would reduce the noise level to below the threshold stipulated in the County's noise ordinance for sensitive hotel receptors; construction noise impacts would be less than significant with implementation of mitigation.

b. Operation

The Project's operational noise and vibration impacts would be less than significant, and no mitigation measures are required.

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4.J PUBLIC SERVICES

4.J.1 FIRE PROTECTION AND EMERGENCY SERVICES

1. INTRODUCTION

This section analyzes the Project's potential impacts on fire protection and emergency medical services provided by the Los Angeles County Fire Department (LACFD). The analysis addresses potential impacts to service capacity, fire flow, emergency response times, emergency access, and fire safety. This section is based in part on information provided by the LACFD (included in Appendix H-1 of this Draft EIR). This section also incorporates information provided in the LACFD 2014 Statistical Summary; LACFD Strategic Plan, Engineering Our Future (Strategic Plan)(2012); the Los County Safety Element (Safety Element) (December 1990), and the Draft Environmental Impact Report for the Los Angeles County General Plan Update (General Plan Update Draft EIR) (June 2014).

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Fire Protection Facilities, Services, and Response Times

LACFD provides 24-hour, all-risk emergency services to a population of over four million residents in 58 cities and all of the County's unincorporated communities¹ within a 2,305-square-mile service area.² There are three major geographic regions (the North Regional Operations Bureau, the Central Regional Operations Bureau, and the East Regional Operations Bureau) within the LACFD service area, which are divided into nine divisions and 22 battalions. LACFD provides emergency services in response to a wide range of incidents, including structure fires, wildfires, commercial fires, hazardous materials incidents, urban search and rescue, and swift water rescue.³ In 2014, LACFD responded to approximately 8,080 fire incidents daily from 171 fire stations. LACFD consists of approximately 4,663 emergency personnel, of which approximately 2,133 are firefighters. LACFD includes 163 engine companies, 32 truck companies, 67 paramedic squads, 24 paramedic assessment engines, and nine helicopters. LACFD specialty services include four emergency support teams, two urban search and rescue task forces, and four hazardous materials task forces.⁴

The Project Site is located within Division 8 of LACFD's East Regional Operations Bureau.⁵ This Bureau includes Divisions 2, 4, 8, and 9, representing 76 fire stations serving communities in the east side of the County. Division 8 serves the cities of Diamond Bar, La Puente, City of Industry, Pomona Walnut, and the unincorporated communities of Hacienda Heights and Rowland Heights.

¹ Los Angeles County Fire Department Strategic Plan, *Engineering our Future*, 2012.

² Los Angeles County Fire Department 2014 Statistical Summary.

³ Los Angeles County Fire Department Strategic Plan, *op. cit.*

⁴ Los Angeles County Fire Department 2014 Statistical Summary.

⁵ Los Angeles County Department of Regional Planning, *Draft EIR Los Angeles County General Plan Update, SCH No. 2011081042, June 2014, Figure 5.14-1*. Available at: http://planning.lacounty.gov/assets/upl/project/gp_2035_deir.pdf.

The Project Site is not located within a Fire Hazard Area.⁶ LACFD Fire Station 145 (Fire Station), located at 1525 S. Nogales Street, Rowland Heights, is the primary fire protection service provider to the Project Site. Fire Station 145 is located approximately 1.2 miles south of the Project site. Fire Station 145 has a jurisdictional service boundary of 8.13 square miles. However, LACFD operates under a regional concept in its approach to providing fire protection and emergency medical services, whereby emergency response units are dispatched as needed to an incident anywhere in LACFD's service territory based on distance and availability, without regard to jurisdictional or municipal boundaries. There are no mutual aid agreements in effect within the Project area. The Project and the surrounding areas are served by LACFD. Fire Station 145 is staffed with a three-person engine company (one captain, one fire fighter specialist, and one fire fighter) and a two-person emergency support team (one fire fighter specialist and one fire fighter) for every 24-hour shift.⁷

LACFD uses national guidelines of a five-minute response time for the first-arriving unit for fire and emergency medical services and eight minutes for the advanced life support (paramedic) unit in urban areas, such as the Project Site. During 2014, Fire Station 145 responded to a total of 1,857 emergency incidents, including 52 fires, 1,523 medical, and 282 other/miscellaneous incidents. The average emergency response time was four minutes and 37 seconds (4:37). According to LACFD, it is estimated that Fire Station 145 would have an emergency response time of four minutes to the Project Site.⁸ The Fire Station's average emergency response time of 4:37 minutes and the Fire Station's estimated response time of four minutes to the Project Site are both within the LACFD's response time goals.

(2) Emergency Access

Emergency access to the Project Site is provided by Gale Avenue to the south and Railroad Street via New Charlie Road to the north. As described above, the distance from the nearest fire station to the Project Site is 1.2 miles. Direct access to the Project Site from Fire Station 145 is available via Nogales Street north to Gale Avenue.

(3) Fire Flow

In general, fire flow requirements are closely related to land use, as the quantity of water necessary for fire protection varies with the type of development, life hazard, type of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). As stated by LACFD personnel, the fire flow requirement for the Project would be 4,000 gallons per minute (gpm) at 20 pound per square inch (psi) residual pressure for up to a four-hour duration. The required distance between fire hydrants is 300 feet.⁹

The Rowland Water District (RWD) provides water service to the Project Site. As described in Section 4.L2, Water Supply, no domestic water lines serve the Project Site. Existing water lines in the vicinity include a 12-inch line located within the UPRR/Metrolink railroad track right-of-way and a 12-inch line in the Gale

⁶ Los Angeles County Department of Regional Planning, *Los Angeles County General Plan, Safety Element, December 1990, Plate 7 and Angeles County Department of Regional Planning, Draft EIR Los Angeles County General Plan Update, op. cit., Figure 5.14-2.*

⁷ Kevin T. Johnson, Acting Chief, Forestry Division Prevention Services Bureau, LACFD, letter dated July 2, 2015 and included in Appendix H-1 of this EIR.

⁸ *Ibid.*

⁹ *Ibid.* and Los Angeles County Department of Regional Planning, *Subdivision Committee Report, Los Angeles County Fire Department Review of Tentative/Exhibition Map, Juan Padilla, August 18, 2015, <http://planning.lacounty.gov/case/view/r2014-01529>.*

Avenue right-of-way. There are no existing fire hydrants on the Project Site. As stated by LACFD, a flow test recently conducted by the RWD indicates that the existing fire hydrants and water system meet the current Fire Department requirements.¹⁰

b. Regulatory Framework Summary

(1) State of California

The California Code of Regulations (CCR) Title 24, 2013 California Building Standards Code, Part 2, California Building Code (CBC) and Part 2.5, California Residential Building Code, is a compilation of building standards, including fire safety standards for residential and commercial buildings. CBC standards are based on building standards that have been adopted by State agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature, not covered by the national model code. Title 24, Part 9 contains the California Fire Code (CFC). Typical fire safety requirements of the CFC include the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The CFC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. The County has adopted by reference, with certain changes and amendments, the 2013 Edition of the CFC.

(2) County of Los Angeles

(a) Los Angeles County General Plan Safety Element

The Los Angeles County General Plan Safety Element (Safety Element)¹¹ addresses earthquake, landslides, flood, and fire hazards and potential hazardous materials incidents related to these hazards. The Safety Element goal for Wildland and Urban Fire Hazards is to “Reduce threats to public safety and protect property from wildland and urban fire hazards.” Policy 17, which applies to this Project, states: “Continue efforts to reduce all fire hazards, with special emphasis on reducing hazards associated with older buildings, multistory structures, and fire-prone industrial facilities; and maintain an adequate fire prevention capability in all areas.”

(b) Los Angeles County Code

(i) Title 32, Fire Code

The County of Los Angeles Fire Code (Fire Code) includes provisions that address fire apparatus access roads, adequate road widths, fire flow requirements, and fire hydrant spacing. For example, Section 105.7.10.1, Land Development Review, requires LACFD review and approval for applications, including parcel maps, final maps, conditional use permits, environmental impact reviews, zone changes, and water plan reviews. Section 503.1.2, et seq, contains requirements for fire apparatus access roads, marking of fire lanes and high-voltage transmission lines, and traffic-calming devices. Section 903.2.11.3, requires the installation of an automatic sprinkler system for buildings with more than three stories. Section 903.7 states

¹⁰ *Los Angeles County Department of Regional Planning, Subdivision Committee Report, op. cit.*

¹¹ *Los Angeles County Department of Regional Planning, Safety Element, op. cit., December 1990.*

that in multistory buildings four stories or higher, the automatic fire sprinkler system shall include an indicating control valve, water flow detector with an alarm bell, drain valve, and inspector's test valve with sight gauge. Appendix B, Section B105.2 states that a reduction in required fire flow of up to 50 percent is allowed when the building is provided with an approved automatic sprinkler system.

(ii) Title 20, Utilities

Los Angeles County Code (LACC) Title 20, Part 2, Design, Section 12.16.060, Minimum Fire Flow and Fire Hydrant Requirements, specifies that the minimum fire flow and fire hydrant requirements shall be determined by the Fire Chief or Fire Marshal based on local conditions, exposure, congestion, and construction of buildings. Should a minimum fire flow in excess of 5,000 gpm be required by the Fire Chief or Fire Marshal, the determination must first be approved by the water appeals board. Where buildings are constructed of fire-resistive materials and/or provided with automatic sprinkler systems, required fire flow may be reduced. For required fire flows greater than 2,000 gpm, the total required fire flow must be available from no more than the two closest public street fire hydrants to the proposed structure.

(iii) Title 21, Subdivisions

LACC Title 21, Chapter 21.24, Part 1, Design Standards, contains additional access road requirements to ensure adequacy of a route of access during evacuation and on the deployment of fire equipment or other services under emergency conditions. Part 2, Mapping Specifications, Section 21.44.250, requires that each easement shown for any storm drain or sewer or fire access to be designated on the final map or parcel map. Part 3, Local Streets and Ways, Section 21.24.220, requires the provision of fire protection access easements or fire breaks.

(c) Los Angeles County Fire Department Strategic Plan, Engineering Our Future (2012)

LAFD's Strategic Plan is designed to address short- and long-term challenges by providing a roadmap to maximize operational effectiveness, strengthen fiscal sustainability, and maximize integrated services delivery. The Strategic Plan is designed to carry out the County's public safety mission in meeting the current and future needs of over four million residents living and working in communities throughout the County.

(d) Office of Emergency Management and Operational Area Emergency Response Plan

The Office of Emergency Management (OEM) is responsible for organizing and directing the preparedness efforts of the Emergency Management Organization of the County. OEM is the day-to-day County Operational Area coordinator. As part of this effort, OEM prepares and maintains an Operational Area Emergency Response Plan (OAERP).¹² The OAERP establishes the coordinated emergency management system, which includes prevention, protection, response, recovery, and mitigation.¹³

¹² Los Angeles County, Office of Emergency Management, About OEM, <http://lacoa.org/aboutoem.html>. Accessed July 15, 2015.

¹³ Los Angeles County, Office of Emergency Management, Operational Area Emergency Response Plan, <http://lacoa.org/oaerp.htm>. Accessed July 15, 2015.

3. ENVIRONMENTAL IMPACTS

a. Methodology

Fire protection and emergency medical service needs relate to the size of the population and geographic area served, the number and types of calls for service, and the characteristics of the community and the Project. Changes in these factors resulting from the Project may increase the demand for services. LACFD evaluates the demand for fire prevention and protection services on a project-by-project basis, including review of the proposed land use, fire protection needs, and design features, to determine if the Project would require additional equipment, personnel, new facilities, or alterations to existing facilities. Additionally, consideration is given to the size and components of the Project, fire flow necessary to accommodate the Project, response time (an acceptable response time is five-minutes for the first-arriving unit for fire and emergency medical services and eight minutes for the advanced life support), fire hydrant sizing and placement standards, access, and the potential to use or store hazardous materials. Based on these factors, a determination is made as to whether LACFD would require a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact. As part of this analysis, LACFD staff was consulted and responses were incorporated regarding the Project, the Strategic Plan and General Plan Update Draft EIR were reviewed, the LACFD and OEMS websites were reviewed, and applicable provisions of the Fire Code were reviewed.

b. Thresholds of Significance

The analysis of potential impacts on fire protection and emergency services impacts is based on thresholds derived from the Los Angeles County Department of Regional Planning Initial Study Checklist screening questions, which are based in part on Appendix G of the State *CEQA Guidelines*. These questions are as follows.

15. Public Services

- a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - Fire protection?

Based on this factor, the Project would have a potentially significant impact on fire protection and emergency services if it would:

- FIRE-1** Require the addition of a new fire station, or the expansion, consolidation or relocation of an existing facility to maintain service, which would result in a substantial adverse physical impact on the environment.

c. Project Characteristics and Design Features

The Project Site currently is undeveloped except for a temporary detour road and related temporary construction staging and surface parking construction by the ACE in conjunction with the Nogales Street Grade Separation Project. All ACE improvements on the Project Site would be removed by ACE prior to

commencement of Project construction. The Project would intensify use of the Site compared to existing conditions. The proposed uses would introduce structures and daytime and 24-hour population to the Project Site. Parcel 1, the Commercial Center, would be developed with four commercial-occupancy buildings proposed to be one story and two stories tall, rising to a maximum height of approximately 35 feet. Parcel 2 would be developed with a full-service hotel (Hotel A) with 275 keys, meeting rooms, and a restaurant. Hotel A would be six stories and approximately 80 feet in height. Parcel 3 would be developed with an extended-stay hotel (Hotel B) that would be six stories and approximately 73 feet in height. Developed square footage for the three parcels would total approximately 450,806 square feet.

As shown on Figure 2-4, *Conceptual Site Plan*, in Chapter 2.0, Project Description, the Project Site would front onto Gale Avenue, with primary vehicular access to be provided by a new shared driveway on Gale Avenue between the commercial uses on Parcel 1 and the hotels on Parcels 2 and 3, and a secondary new driveway on Gale Avenue near the western Project Site boundary providing access to the hotels on Parcels 2 and 3. An additional driveway entrance to Parcel 1 would be also provided from the existing Gale Avenue driveway shared with the Rowland Heights Plaza Shopping Center, along the eastern Project Site boundary.

Construction of Phase 1 (the Commercial Center and Hotel A) is anticipated to begin in mid-2017 (pending Project consideration and approval by the County and following completion of the Nogales Street Grade Separation Project), and would take approximately 24 months, with completion in 2019. Construction of Phase 2 (Hotel B) would take approximately 18 months. Construction of the two phases may overlap or be consecutive, depending on market conditions. Construction staging and worker parking would be accommodated on the Project Site during both stages of construction. However, construction would include some off-site improvements, including utility connections and roadway improvements such as the new traffic signal at the Project's primary entrance driveway.

The Project would incorporate the following regulatory requirements as Conditions of Approval for access and water required by LACFD:¹⁴

- Access as noted on the Tentative and the Exhibit Maps shall comply with Title 21 (County of Los Angeles Subdivision Code) and Section 503 of the Title 32 (County of Los Angeles Fire Code), which requires an all-weather access surface to be clear to sky.
- A reciprocal access agreement is required for all driveways being shared within this development. Documentation shall be submitted to the Fire Department for review prior to Final Map clearance.
- The driveways required for fire apparatus access shall be indicated on the Final Map as "Private Driveway and Fire lane," with the widths clearly depicted.
- The on-site fire lanes shall provide a minimum paved unobstructed width of 26 feet, clear to the sky. Verification for compliance will be performed during the Fire Department review of the architectural plan prior to building permit issuance.

¹⁴ Based on correspondence from Juan Padilla, Fire Prevention Division, Land Development Unit, LACFD, included in correspondence from Kevin T. Johnson, Acting Chief, Forestry Division, Prevention Services Bureau, LACFD, dated July 2, 2015 and included in Appendix H-1 of this Draft EIR and the Los Angeles County Department of Regional Planning, Subdivision Committee Report, *op. cit.*

- The on-site fire lanes around the proposed hotel buildings shall provide a minimum paved unobstructed width of 28 feet, clear to the sky, due to the heights of the buildings. Verification for compliance will be performed during the Fire Department review of the architectural plan prior to building permit issuance.
- The proposed buildings within this development being served by a 26 feet wide fire lane shall have a height restriction due to the fire lane width indicated on the Exhibit Map. Such buildings served by a 26 feet wide fire lane shall not exceed 30 feet above the lowest level of the Fire Department vehicular access road or exceed three stories. Buildings exceeding this height shall provide a minimum paved fire lane width of 28 feet. The required fire lane shall be parallel to the longest side of the building between 15 feet and 30 feet from the edge of the fire lane to the building wall. Verification for compliance will be performed during the Fire Department review of the architectural plan prior to building permit issuance.
- All proposed buildings shall be placed such that a fire lane is provided to within 150 feet of all exterior walls of the first story. This measurement shall be by an approved route around the exterior of the building or facility. Verification for compliance will be performed during the Fire Department review of the architectural plan prior to building permit issuance.
- The gradient of the fire lanes shall not exceed 15 percent. Any changes in grade shall not exceed 10 percent within a 10 foot distance or 5.7 degrees. Cross-slopes and required Fire Department turnarounds shall not exceed 2 percent grades. Verification for compliance will be performed during the Fire Department review of the architectural plan prior to building permit issuance.
- Any change of direction within the fire lanes shall provide a 32 -foot centerline turning radius. Verification for compliance will be performed during the Fire Department review of the architectural plan prior to building permit issuance.
- The surface of the fire lanes shall be designed and maintained to support the live load of a fire apparatus weighing 75,000 pounds. Verification for compliance will be performed during the Fire Department review of the architectural plan prior to building permit issuance.
- A construction bond is required for all required fire lanes within this development. The Applicant shall provide written verification of the posted construction bond to the Fire Department prior to Final Map clearance.
- The driveways required for fire apparatus access shall be posted with signs stating "No Parking-Fire Lane" and/or striped accordingly in compliance with the County of Los Angeles Fire Code prior to occupancy.
- All driveways within this development shall provide approved street names and signs. All proposed buildings shall provide approved address numbers. Compliance required prior to occupancy to the satisfaction of the Department of Public Works and the County of Los Angeles Fire Code.
- Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.

- Per the flow test performed by the Rowland Water District dated 02-05-14, the existing fire hydrants and water system meet the current Fire Department requirements. An updated fire flow test will be required by the Fire Department prior to building permit issuance.
- The Applicant shall install two public and 12 private fire hydrant(s) as noted on the Exhibit Map on file with the Fire Department.
- All hydrants shall measure 6"x 4"x 2-1/2" brass or bronze, conforming to current American Water Works Association (AWWA) standard C503 or approved equal.
- All required fire hydrants shall provide a fire flow of 4,000 gallons per minute at 20 psi for a duration of four hours, over and above maximum daily domestic demand. This fire flow may be reduced by the Fire Prevention Engineering Section as approved during the building permit review process.
- Prior to final map clearance, provide written verification that the required fire hydrants have been bonded for in lieu of installation.
- Vehicular access must be provided and maintained serviceable throughout construction to all required fire hydrants. All required fire hydrants shall be installed, tested, and accepted prior to construction.
- Parking shall be restricted 30 feet adjacent to any required public or private fire hydrant, 15 feet on each side measured from the center of the fire hydrant. Adequate signage and/or striping shall be required prior to occupancy.
- An approved automatic fire sprinkler system is required for proposed building within this development. Submit design plans to the Fire Department Sprinkler Plan Check Unit for review and approval prior to installation.

d. Project Impacts

Threshold FIRE-1: A significant impact on fire protection and emergency services would occur if the Project would require the addition of a new fire station, or the expansion, consolidation, or relocation of an existing facility to maintain service, which would result in a substantial adverse physical impact on the environment.

Impact Statement FIRE-1: *The Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing fire station to maintain service due to compliance with County Code and LACFD requirements that address fire flow, fire safety, emergency response times, and emergency access. Therefore, construction and operational impacts would be less than significant.*

(1) Project Construction

Construction activities associated with the Project may temporarily increase demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials such as wood, plastics, sawdust, coverings and coatings, heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with California Division of Occupational Safety and Health Administration (Cal/OSHA) and Fire Code requirements, construction managers and personnel would be trained in fire prevention and emergency response. Fire suppression equipment specific to construction would be

maintained on-site. As required by the LACFD, all required fire hydrants shall be installed, tested, and accepted prior to construction. Additionally, Project construction would comply with applicable existing codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Therefore, in light of State and County regulations and Code and LACFD requirements that would in part require personnel trained in fire prevention and emergency response, maintenance of fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials on the Project Site, construction impacts on fire protection and emergency medical services would be less than significant.

Regarding emergency access and response times, construction staging and construction worker parking associated with the Project would be accommodated on the Project Site, limiting potential conflicts with traffic on local streets. As required by the LACFD, vehicular access would be provided and maintained throughout construction to all required fire hydrants. Moreover, as discussed in Section 4.K, Transportation and Parking, although Project construction would be ongoing for a minimum of 24 months and would involve off-site improvements for utility connections and roadway improvements, with implementation of Project Design Feature PDF-TRAF-1, Project construction activity and traffic would have a less than significant impact on emergency access and response times in the Project vicinity. Impacts on emergency access and response times would therefore be less than significant.

(2) Project Operation

(a) Fire Flow Requirements

In general, fire flow requirements are closely related to land use since the quantity of water necessary for fire protection varies with the type of development, life hazard, type of occupancy, and degree of fire hazard. The Project would introduce commercial and hotel structures on a site. As previously stated, the fire flow requirement for the Project is 4,000 gpm at 20 psi minimum residual pressure for a duration of four hours. Currently no fire hydrants are on the Project Site. The Applicant would be required to install two public and 12 private fire hydrants that meet LACFD requirements. The proposed location of public and private fire hydrants has been reviewed and conditionally approved by the LACFD. The fire service connection to the Project Site would be from an existing 12-inch water line located within the Gale Avenue right-of-way. A new 10-inch fire loop line would provide connection to the fire hydrants and a new 6-inch line would provide connection from the fire hydrants and fire sprinkler services to the buildings. The proposed water system is expected to meet the fire flow requirements based on a fire flow test conducted by the RWD on February 5, 2014. As required by the LACFD, the RWD will perform and updated fire flow test prior to the issuance of building permits to ensure that fire flow requirements are met. Therefore, Project impacts with respect to fire flow requirements would be less than significant.

(b) Fire Safety

The Project would be subject to the requirements of the Building Code, Fire Code, Utilities Code, and Subdivision Code for new construction that address structural design, building materials, site access, fire lanes, fire flow requirements, automatic sprinkler systems, alarms, and smoke detectors. Furthermore, the Applicant would be required to submit an Emergency Response Plan for review and approval by LACFD. The Emergency Response Plan would include, but not be limited to the following: mapping of site access and emergency exits, evacuation routes for vehicles and pedestrians, and locations of the nearest hospitals and fire stations.

Compliance with the applicable regulatory and LACFD requirements would reduce Project impacts on fire safety to a less than significant level.

(c) Emergency Response Times

As presented above, Fire Station 145 is located 1.2 miles south of the Project Site and has an estimated emergency response time of four minutes, which falls within the LACFD's response time goals of five minutes for the first-arriving unit for fire and emergency medical services and eight minutes for the advance life support unit (paramedic) unit in urban areas.

Development of the Project Site would introduce daytime and 24-hour population to the area. As described in Section 4.K, Transportation and Parking, Project-related traffic would significantly impact two intersections, even with implementation of all feasible mitigation measures. Accordingly, traffic associated with the Project could potentially affect emergency vehicle response times in the area.

Impacts on traffic that could cause delays in emergency response times are addressed through Project Design Features PDF-TRAF-2 and PDF-TRAF-3. These measures would provide for the installation of a three-way traffic signal and a limit on the maximum permitted occupancy load for all restaurant uses to 1,561 occupants, which would improve traffic conditions and facilitate emergency access to the Project Site.

Emergency response is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response. In light of current conditions where emergency medical responses and fire incidence response times are being met by Fire Station 145 and the traffic-related Project Design Features, Project impacts on response times are considered less than significant.

(d) Emergency Access

Emergency access to the Project Site would be provided by three ungated access driveways on Gale Avenue. A dedicated fire lane and other LACFD access requirements such as minimum roadway width, overhead clearance, and turning radius, and fire lanes have been reviewed and conditionally approved by the LACDPW and LACFD to ensure that the Project provides adequate emergency access. Therefore, Project impacts on emergency access would be less than significant.

e. Cumulative Impacts

Chapter 3.0, General Description of Environmental Setting, of this Draft EIR provides a list of three related projects that are planned or are under construction in the Project area. These projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*. As depicted, all related projects are located south of the Pomona Freeway (SR-60). The Project and related projects would increase the daytime and 24-hour populations and introduce structures that would create increased demand for fire protection and emergency medical services in the County. This cumulative demand for fire protection could require additional personnel and resources at the LACFD to provide adequate service levels and to maintain existing response times. LACFD operates under a regional concept in its approach to providing fire protection and emergency medical services anywhere in the LACFD service territory without regard to

jurisdictional or municipal boundaries. Therefore, all three related projects are considered in this analysis without regard to the jurisdictional boundaries of a specific fire station.

Although a cumulative demand on Fire Department services could occur, cumulative project impacts on fire protection and emergency medical services would be reduced through regulatory compliance, similar to the Project. All related projects would be subject to review by the LACFD for compliance with Fire Code and Building Code regulations related to fire flow, fire safety, and access requirements. In addition, due to the distance of the Project from the related projects, the number of related projects identified, and LACFD and LACDPW requirements that would be imposed on these projects during construction, the Project's contribution to cumulative impacts would be less than significant. Regarding emergency response times during Project operation, although the Project would result in significant unavoidable traffic impacts at two intersections, project-by-project traffic mitigation, multiple fire station response capabilities, and other requirements imposed by the LACFD are expected to continue to support adequate response times.

The LACFD's operating budget includes funds generated by property tax revenues, which are supplemented by tax-base expansion. Tax-base revenue from Project development—together with revenues from past, present, and reasonably foreseeable future projects—would generate funding for fire protection services. This funding would support any needed increases in staffing, fire stations, and equipment to keep response times within acceptable limits (i.e., five minutes for first arrival and eight minutes for paramedic response within urban areas and eight minutes for first arrival and 12 minutes for paramedic response within suburban areas). Consequently, the cumulative demand for fire protection services would incrementally increase over time, resulting in potential cumulative impacts associated with the construction of new facilities or the alteration of existing facilities. It would be speculative to predict where and when a new fire station would be needed, as no planned improvements have been identified by the LACFD. Therefore per State *CEQA Guidelines* Section 15145, regarding speculation, no further analysis is required. Any new or altered facilities that would be required in the future would be subject to separate CEQA review.

Based on the above, the Project would not substantially contribute to cumulatively considerable impacts regarding fire protection services and facilities and, as such, impacts would be less than significant.

4. MITIGATION MEASURES

The Project would have less than significant impacts on fire protection and emergency services and no mitigation measures are required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant, and no mitigation measures would be required.

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4.J SERVICES

4.J.2 SHERIFF PROTECTION

1. INTRODUCTION

This section describes existing law enforcement services and analyzes potential impacts related to these services that would occur as a result of Project implementation. The focus of the analysis is on the Los Angeles County Sheriff's Department (LASD) facilities and staffing resources that currently serve the Project Site and vicinity. This section is primarily based on information provided by LASD (included in Appendix H-2, Sheriff's Department Correspondence, of this Draft EIR).

2. ENVIRONMENTAL SETTING

a. Existing Conditions

LASD provides law enforcement services to more than one million residents living within 90 unincorporated communities, as well as to more than four million residents living within 40 contract cities. LASD also provides law enforcement services to nine community colleges, Metro, and 48 superior courts. LASD is divided into ten divisions; the Homeland Security Division focuses on potential threats related to local homeland security issues, such as terrorism or bioterrorism.¹ The Special Enforcement Bureau (SEB) is comprised of Special Enforcement Detail, Emergency Services Detail, and Canine Services Detail. SEB handles various high-risk operations such as explosive detection, hostage resolution, barricades, and security for dignitaries.² The Field Operation Regions are centered on 25 patrol stations within four patrol divisions dispersed throughout the County. In addition to proactive enforcement of criminal laws, LASD also provides investigative, traffic enforcement, accident investigation, and community education functions. LASD maintains mutual aid agreements with other law enforcement agencies within and beyond Los Angeles County, which are facilitated through the State Office of Emergency Services.³

The County Office of Emergency Management's (OEM) Emergency Operations Center (EOC), located at 1275 North Eastern Avenue, Los Angeles, is responsible for emergency operations in unincorporated Los Angeles County. In the event of an emergency, LASD and LACFD provide first response, as well as the initial contact with other agencies and organizations that may need to be involved.⁴

The Project Site is located within LASD's East Patrol Division.⁵ The Walnut/Diamond Bar Sheriff Station (Sheriff Station), located at 21695 East Valley Boulevard in the city of Walnut, is the primary law enforcement service provider to the Project Site. The Sheriff Station is located approximately 4.6 miles northeast of the Project Site. The Sheriff Station's service area encompasses the cities of Walnut and

¹ Los Angeles County Department of Regional Planning, *Draft EIR Los Angeles County General Plan Update, SCH. No. 2011081042, June 2014, page 4-25.*

² Captain Jeffrey L. Scroggin, *Walnut/Diamond Bar Station, LASD, letter dated July 21, 2015.*

³ *Ibid.*

⁴ Captain Jeffrey L. Scroggin, *Walnut/Diamond Bar Station, LASD, letter dated July 21, 2015 and Los Angeles County, Office of Emergency Management, About OEM, <http://lacoa.org/aboutoem.html>. Accessed July 15, 2015.*

⁵ Los Angeles County Sheriff's Department, *Patrol Divisions MAP, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2013/maps/lasdmap.html>. Accessed July 22, 2015.*

Diamond Bar, the unincorporated communities of Rowland Heights and Covina Hills, and unincorporated areas of West Covina. As of January 1, 2015, the estimated resident population of this Sheriff Station's service area was 160,000 persons. The Sheriff Station is currently staffed by 118 sworn deputies and 41 civilian employees. The Sheriff Station provides 24-hour field deployment via multiple shifts utilizing patrol vehicles, helicopters and fixed-winged aircraft, mounted patrol, search and rescue, and emergency operations.

According to LASD staff, it is estimated that the Sheriff Station would have approximate response times to the Project Site as follows:

- for emergency (crime in progress and life threatening) - three to five minutes
- for priority (crime in progress that is not life threatening) - seven to nine minutes
- for routine calls (crime already occurred and not life threatening) - 20 to 30 minutes

Response times are variable because the responding patrol unit may be deployed elsewhere within the service area and not necessarily dispatched from the Station. Acceptable response times for emergency, priority, and routine calls are 10 minutes, 20 minutes, and 60 minutes, respectively.⁶ As such, the Sheriff Station's anticipated response times to the Project Site are within LASD's response time standards.

The Project Site is located within the Sheriff Station's 2931 Reporting District (RD). RD 2931 is generally bounded to the north by Gayle Avenue, to the east by Nogales Street, to the south by Colima Road, and to the west by Fullerton Road,⁷ an area of approximately 0.5 square miles. During the reporting period beginning January 1, 2015 and ending June 30, 2015, a total of 74 Part I crimes (i.e., homicide, rape, robbery, assault, burglary, larceny, motor vehicle theft, and arson) were committed in this RD. For comparison purposes, a total of 1,049 Part I crimes were committed throughout the Sheriff Station's service area during this same reporting period.⁸ Thus this RD represents approximately 7 percent of all Part I crimes committed within the Sheriff Station's service area.

b. Regulatory Framework Summary

(1) County of Los Angeles

OEM's EOC, is responsible for emergency operations in unincorporated Los Angeles County. The Operational Area Emergency Response Plan (OAERP) establishes the coordinated emergency response system, which includes prevention, protection, response, recovery, and mitigation. The OAERP also provides an overview of emergency management in the area.

⁶ *Ibid.*

⁷ *Deputy Iniguez, Walnut/Diamond Bar Sheriff Station, telephone conversation August 28, 2015.*

⁸ *Ibid.*

3. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of impacts on sheriff services addresses the Project's effects on the ability of sheriff personnel to adequately serve the existing and future population in the Project vicinity, taking into consideration the security and/or design features incorporated into the Project to reduce the demand for sheriff protection services. The analysis is based on information provided by LASD staff at the Walnut/Diamond Bar Station.

b. Thresholds of Significance

The analysis of potential for impacts on sheriff protection services is based on thresholds derived from the Los Angeles County Department of Regional Planning Initial Study Checklist screening questions, which are based in part on Appendix G of the State *CEQA Guidelines*. These questions are as follows:

15. Public Services

- a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - Sheriff protection?

Based on this factor, the Project would have a potentially significant impact on sheriff protection if would:

SHER-1 Generate a demand for sheriff facilities or services that could not be accommodated by the expected level of service available at buildout, taking into consideration the Project's security and/or design features, such that the addition of a new sheriff facility, or the expansion, consolidation or relocation of an existing facility, would be required to maintain service.

c. Project Characteristics or Design Features

The Project Site is currently undeveloped except for a temporary detour road and related temporary construction staging and surface parking construction for the Alameda Corridor Extension (ACE) Nogales Street Grade Separation Project. All ACE improvements on the Project Site would be removed by ACE prior to commencement of Project construction. The proposed uses would introduce structures and daytime and 24-hour populations to the Project Site. Parcel 1, the Commercial Center, would be developed with approximately 129,926 square feet of retail, restaurant, and commercial uses. Parcel 2 would be developed with a full-service hotel (Hotel A) with 275 keys, meeting rooms, and a restaurant; Parcel 3 would be developed with an extended-stay hotel (Hotel B) with 202 guest suites.

Construction of Phase 1 (the Commercial Center and Hotel A) is anticipated to begin in mid-2017 (pending Project consideration and approval by the County and following completion of the Nogales Street Grade Separation Project), and would take approximately 24 months, with completion in 2019. Construction of Phase 2 (Hotel B) would take approximately 18 months. Construction of the two phases may overlap or be consecutive, depending upon market conditions. Construction staging and worker parking would be accommodated on the Project Site during both stages of construction. However, construction would include

some off-site improvements, including utility connections and roadway improvements such as the new traffic signal at the Project's primary entrance driveway.

During construction, the Applicant would employ private security to patrol the construction area to minimize the potential for trespass, theft, and other unlawful activities. Construction fencing, locked entry, and security lighting would also be used around active construction areas to enhance security during construction. A Construction Staging and Traffic Management Plan would also be implemented as Project Design Feature PDF-TRAF-1.

Upon completion, the Project would have on-site private security for the commercial and hotel uses and security systems, such as closed-circuit televisions within the buildings and parking structures, to promote surveillance and security. The parking lot, parking garage, and pedestrian areas would be well lighted. Because the Project would include two hotels, there would be 24-hour activity on the Site. The Commercial Center buildings are oriented around a central surface parking lot and community gathering area, and the hotels are oriented toward a central porte cochere. These design features would enhance site visibility and safety. In addition, a masonry wall would be provided along the northern boundary to separate the Project Site from the railroad tracks.

As shown on Figure 2-4, *Conceptual Site Plan*, in Chapter 2.0, Project Description, the Project Site would front onto Gale Avenue. Primary vehicular access would be provided by a new shared driveway on Gale Avenue between the commercial uses on Parcel 1 and the hotels on Parcels 2 and 3. A secondary new driveway on Gale Avenue near the western Project Site boundary would provide access to the hotels on Parcels 2 and 3. An additional driveway entrance to Parcel 1 would be also provided from the existing Gale Avenue driveway shared with the Rowland Heights Plaza Shopping Center, along the eastern Project Site boundary. Access to the Project Site from the driveways would remain open at all times.

The Project would incorporate the following recommendations provided by LASD and included in Appendix H-2 of this Draft EIR (modified here to indicate required commitment on the part of the Applicant as Project conditions of approval):

- The Construction Staging and Traffic Management Plan will be implemented to address construction-related traffic congestion and emergency access routes:
 - If temporary lane closures are necessary, emergency access will be maintained at all times.
 - Flag persons and/or detours will be provided as needed to ensure safe traffic operations.
 - Construction signs will be posted to advise of reduced construction speed limits.
- The Project will incorporate crime prevention through environmental design features through design elements such as building orientation, landscaping, and lighting to enhance visibility and safety.
- Building address numbers will be well lighted to facilitate emergency response.
- Upon completion of the Project (i.e., after plan check approval and prior to issuance of a certificate of occupancy), the Station's command staff will receive a diagram of the Project Site, including building entries, access routes, and other appropriate information to facilitate LASD response.

d. Project Impacts

Threshold SHER-1: A significant impact on sheriff protection would occur if the Project would generate a demand for sheriff facilities or services that could not be accommodated by the expected level of service available at buildout, taking into consideration the Project's security and/or design features, such that the addition of a new sheriff facility, or the expansion, consolidation or relocation of an existing facility would be required to maintain service.

Impact Statement SHER-1: *The Project would not require the addition of a new sheriff facility or the expansion, consolidation, or relocation of an existing sheriff station to maintain service due to the provision of on-site security features and security personnel, coordination with LASD, incorporation of crime prevention through environmental design features, Project Design Features related to traffic, and adequate response times. Impacts would be less than significant.*

(1) Project Construction

Construction-related activities due to construction traffic and temporary lane closures associated with utility connections and roadway improvements could potentially affect emergency access to the Project Site and adjacent uses. Increases in construction traffic would be due to increases in truck traffic associated with export soils, construction equipment, and construction worker trips. As such, construction activities could temporarily increase response time for sheriff vehicles to the Project Site and adjacent uses due to travel time delays to through traffic. However, the impacts of construction activities would be temporary and short term. The majority of construction traffic would occur during off-peak traffic hours, and construction staging and construction worker parking would be accommodated on the Project Site.

As discussed in Section 4.K, Transportation and Parking of this Draft EIR, under Project Design Feature PDF-TRAF-1, a Construction Staging and Traffic Management Plan would be prepared and submitted to LADPW for review and approval prior to commencement of any construction activity. Project Design Feature PDF-TRAF-1 would minimize disruptions to through traffic flow and reduce the potential for interference with emergency access. Consistent with LASD recommendations, the Construction Staging and Traffic Management Plan will identify all traffic control measures, signs, and delineators to be implemented through the duration of construction activities; the measures must define how emergency access will be maintained to the Project Site and adjacent areas at all times. These practices, as well as techniques typically employed by emergency vehicles to clear or circumvent traffic, are expected to limit the potential for significant delays in emergency response times during construction of the Project. Therefore, construction impacts on emergency access would be less than significant.

During construction, equipment, building materials, vehicles, and temporary offices would be temporarily located on site, which could be subject to theft or vandalism. This could potentially require LASD involvement unless adequate safety and security measures are implemented to secure the Project Site. However, as described above, security measures would be incorporated during construction, including construction fencing, security lighting, locked entry, and private security. All entry and exit points would be monitored during construction. These Project Characteristics would reduce crime-related activity during construction, thus reducing demand on LASD. Therefore, impacts to sheriff protection services during construction would be less than significant.

(2) Project Operation

Development of the Project would introduce structures and daytime and 24-hour populations to the Project Site, which would increase demand for LASD services due to theft from auto, crimes against person, and traffic-related incidents. As described above, the Project would include on-site private security and closed circuit televisions within the buildings and parking structures. Furthermore, a diagram of the Project Site, including building entries, access routes and other appropriate information, would be provided to the Station's command staff to facilitate LASD response.

Building orientation and lighting would be provided to enhance visibility and safety. The parking lot, parking garage, and pedestrian areas would be well lit. Because the Project would include two hotels, 24-hour activity would occur on the Project Site, thereby creating a deterrent to criminal activity. The Commercial Center buildings are oriented towards a central surface parking lot and community gathering area, and the hotels have a central porte cochere, which would enhance site visibility and safety. Additional crime prevention features may be included into the Project design based on consultation with LASD.

When an emergency call is received by LASD, the closest mobile police unit to the emergency incident location typically responds. LASD's ability to respond to a call requesting assistance is determined by their ability to navigate roadways successfully and efficiently. As such, response times are affected by traffic conditions. As described in Section 4.K, Transportation and Parking, Project-related traffic would significantly impact two intersections, even with implementation of all feasible mitigation measures. Accordingly, traffic associated with the Project could potentially affect emergency vehicle response times in the area. Traffic impacts that could cause delays in emergency response times are addressed through Project Design Features PDF-TRAF-2 and PDF-TRAF-3. These measures would provide for the installation of a three-way traffic signal and a limit on the maximum permitted occupancy load for all restaurant uses to 1,561 occupants, which would improve traffic conditions and facilitate emergency access to the Project Site.

As described above, the Sheriff Station's anticipated response times to the Project Site are within the LASD's response time standards. Furthermore, emergency response is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response. Therefore, because under current conditions emergency response times are being met by the Sheriff Station and with the traffic-related Project Design Features being proposed for implementation, Project impacts on response times are considered less than significant.

Based on the discussion above, with the provision of on-site security features, coordination with LASD, and incorporation of crime prevention through environmental design features, the Project would not require the provision of new or physically altered sheriff stations to maintain acceptable service ratios or other performance objectives for sheriff protection. Therefore, impacts on LASD would be less than significant since no new facilities would be required.

e. Cumulative Impacts

Chapter 3.0, General Description of Environmental Setting, of this Draft EIR provides a list of three related projects that are planned or are under construction in the Project area. These projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*. As depicted, all related projects are located south of the Pomona Freeway (SR-60). The Project and related projects would increase

the daytime and 24-hour populations and introduce structures that would create increased demand for Sheriff protection services in the County. This cumulative demand for Sheriff services would require additional personnel and resources at the LASD to provide adequate service levels and to maintain existing response times. LASD is part of a mutual aid arrangement with various cities in the County under the California Law Enforcement Mutual Aid System. Under this agreement, all law enforcement agencies in the State assist adjacent or neighboring agencies upon request. Annual evaluation of sheriff protection services by the individual cities and the County determine the adequacy of Sheriff protection services and the necessary resources to meet the public safety needs of the individual communities.

Although a cumulative demand on LASD services could occur, related projects would be subject to review on a case-by-case basis by LASD to ensure that sufficient security measures are implemented to reduce potential impacts of Sheriff services. With implementation of LASD recommendations, Project impacts on emergency response times during construction would be less than significant. In addition, due to the distance of the Project from the related projects, the number of related projects identified, and LASD requirements that would be imposed on these projects during construction, the Project's contribution to cumulative impacts would be less than significant. Regarding emergency response times during Project operation, although the Project would result in significant unavoidable traffic impacts at two intersections, project-by-project traffic mitigation and other requirements imposed by the LASD are expected to continue to support adequate response times.

LASD's operating budget includes funds generated by property tax revenues, which are supplemented by tax-base expansion. Tax-base revenue from development of the Project—as well as past, present, and reasonably foreseeable future projects—would generate funding for Sheriff services to provide needed increases in staffing and sheriff stations/equipment and to keep response times within acceptable limits. Consequently, the cumulative demand for Sheriff services would incrementally increase over time, resulting in potential cumulative impacts associated with the construction of new facilities or the alteration of existing facilities. It would be speculative to predict where and when a new sheriff station would be needed, as no planned improvements have been identified by the LASD. Therefore per State *CEQA Guidelines* Section 15145, regarding speculation no further analysis is required. Any new or altered facilities that would be required in the future would be subject to separate CEQA review.

Based on the above, the Project would not substantially contribute to cumulatively considerable impacts regarding Sheriff protection services and facilities and, as such, impacts would be less than significant.

4. MITIGATION MEASURES

The Project would have less than significant impacts on Sheriff services and no mitigation measures are required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant, and no mitigation measures would be required.

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4.K TRANSPORTATION AND PARKING

1. INTRODUCTION

This section analyzes the Project's potential impacts on traffic and the roadway infrastructure. The adequacy of parking is also evaluated. Relevant regulations and existing conditions are described, as well as the potential for the Project to result in traffic/transportation-related impacts associated with: 1) vehicle trips and traffic congestion, 2) established levels of service by the County of Los Angeles (County), 3) parking supply, 4) the potential for the Project to conflict with an applicable congestion management program (CMP), and 5) the potential to result in inadequate emergency access.

The traffic impact analysis in this section is based on the *Rowland Heights Plaza Traffic Impact Analysis* (Traffic Impact Analysis).¹ The Traffic Impact Analysis is contained in Appendix I-1 of this EIR. The Traffic Impact Analysis has been prepared in consultation with the Los Angeles County Department of Public Works, Traffic and Lighting Division (LACDPW Traffic and Lighting). The parking impact analysis in this section is based on the *Parking Assessment for the Proposed Rowland Heights Plaza and Hotel Project* (Parking Assessment)². The Parking Assessment is contained in Appendix I-2 of this EIR. Technical information has been summarized. For additional details regarding the traffic methodology, see Appendix I-1, Traffic Impact Analysis, of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

This following section describes the existing traffic conditions within the Project study area. The study area includes on-site access points, intersections and corresponding levels of service (LOS), roadway and freeway segments, freeway ramps, and transit facilities within a one-mile radius that may be affected by Project development. Refer to **Figure 4.K-1, Project Location Study Area – Intersection Location Map**, for a depiction of potentially affected facilities in the study area. As shown, the study area extends to Fullerton Road to the west, Shadow Oak Drive to the north, Nogales Street to the east, and Colima Road to the south.

(1) Project Access

Direct vehicle access to the Project Site is provided via Site frontage on Gale Avenue, a two- to four-lane roadway located 75–350 feet north of the Pomona Freeway (SR-60) in the Project vicinity. Gale Avenue intersects Fullerton Road to the west and Nogales Street to the east; both roadways provide interchanges with (SR-60). The Nogales Street interchange is located approximately one-half mile southeast of the Project Site. The Orange Freeway (SR-57) is approximately four miles east of the Project Site, while the San Gabriel River Freeway (I-605) is approximately 8.5 miles to the west.

The Alameda Corridor-East Construction Authority (ACE) Nogales Street Grade Separation Project is currently under construction approximately one-half mile east of the Project Site. As part of the Nogales

¹ Kunzman Associates, Inc., *Rowland Heights Plaza Traffic Impact Analysis*, May 29, 2015.

² Linscott Law & Greenspan, *Parking Assessment for the Proposed Rowland Heights Plaza and Hotel Project*, May 14, 2015.

Street Grade Separation Project, Gale Avenue is being widened by 16 and 18 feet (i.e., eight to nine feet on each side) to create a four-lane road for a distance of 0.36 miles west of its intersection with Nogales Street, including the Project Site frontage. Gale Avenue's eastbound approach to Nogales Street will be reconfigured to accommodate two exclusive left-turn lanes, one through-lane, and one exclusive right-turn lane.

In 2013, ACE constructed a three-lane detour road within a temporary construction easement on the Project Site, together with a temporary at-grade railroad crossing to the north, to provide north/south vehicular access between Railroad Avenue and Gale Avenue since construction of the Nogales Street Grade Separation Project necessitated the temporary closure of Railroad Avenue at Nogales Street. The temporary detour road is known as New Charlie Road to designate it as the southern extension of existing Charlie Road north of the railroad tracks and Railroad Avenue. New Charlie Road averages 40 feet in width, with a traffic signal at its intersection with Gale Avenue and warning devices/flashing lights at the railroad track crossing. The alignment of the New Charlie Road and access road on the Project Site are indicated in Figure 2-3. The New Charlie Road detour and construction access road and temporary parking stalls will be in place for the projected three-year duration of the Nogales Street Grade Separation Project construction and would be completed prior to the start of Project construction.

(2) Existing Roadway System

The existing street system within the Project study area consists of a regional freeway system, major and secondary arterial roadways, and a local street system comprised of collectors and local streets. The roadways in the study area are under the jurisdiction of the County, the City of Industry (City), the City of Los Angeles, and the City of West Covina. Freeways in the study area are under the jurisdiction of the California Department of Transportation (Caltrans).

The study area freeways and streets are classified as follows:

- Freeways are high-volume/high-speed roadways with limited access occurring only at grade-separated interchanges.
- Major Highways provide a 100-foot right-of-way, as referenced in the County of Los Angeles Highway Plan.
- Secondary Highways provide an 80 foot right-of-way, as referenced in the County of Los Angeles Highway Plan.

(a) Freeway System

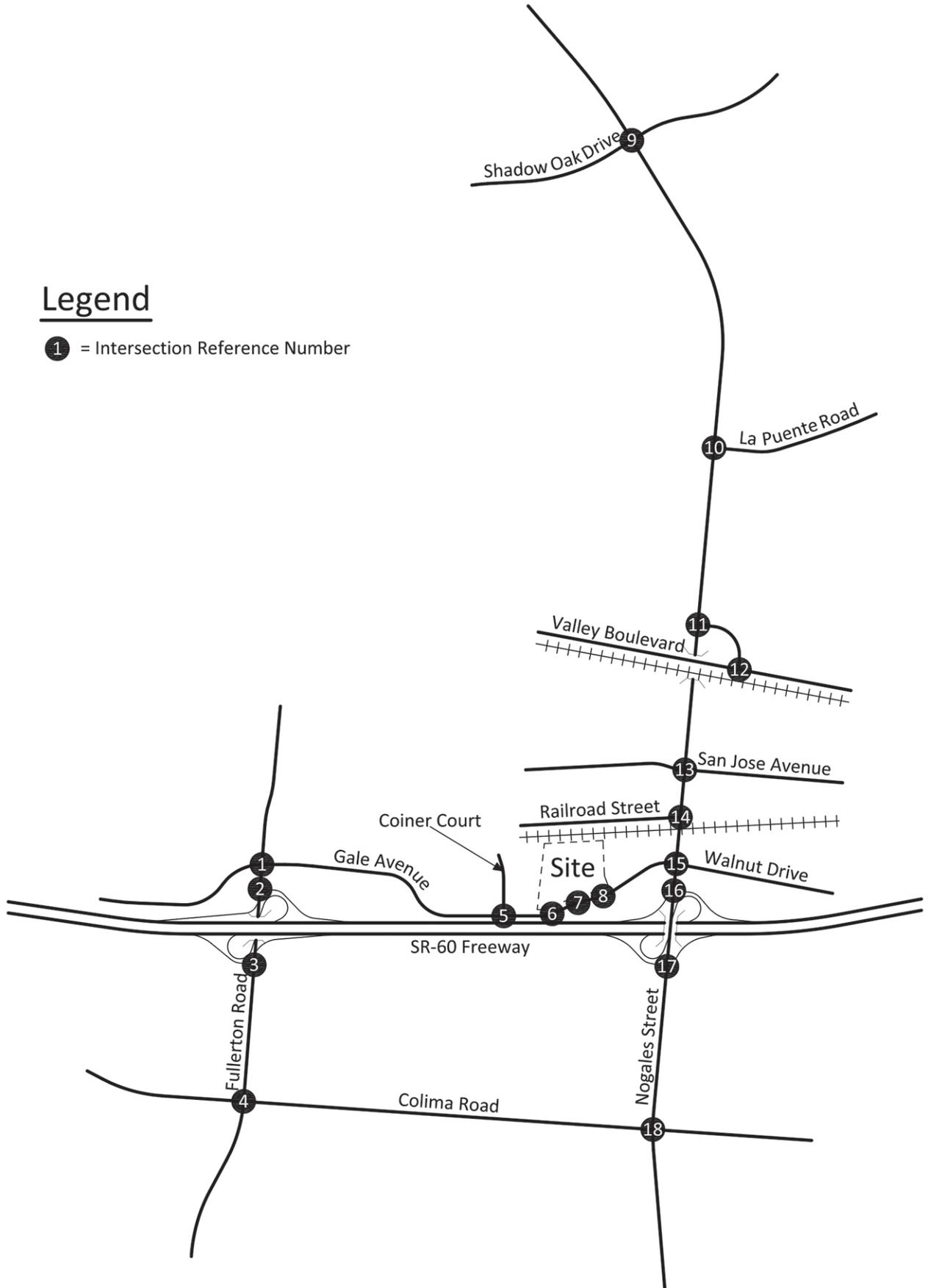
SR-60 runs in an east-west direction south of the Project Site and extends from downtown Los Angeles to its eastern terminus at the Christopher Columbus Freeway (I-10) in Beaumont. In the Project Vicinity, SR-60 provides five lanes in each direction. Interchanges are provided at Nogales Street and Fullerton Road within the study area.

(b) Street System

The Project Site is served by a grid of arterial streets. These streets are oriented toward the north-south and east-west directions. The existing roadway conditions, including the number of through lanes for existing roadways and the existing intersection controls, are depicted in **Figure 4.K-2, Existing Study Area Through Travel Lanes and Intersection Controls**.

Legend

① = Intersection Reference Number



N
Not to scale

Project Location Study Area - Intersection Location Map

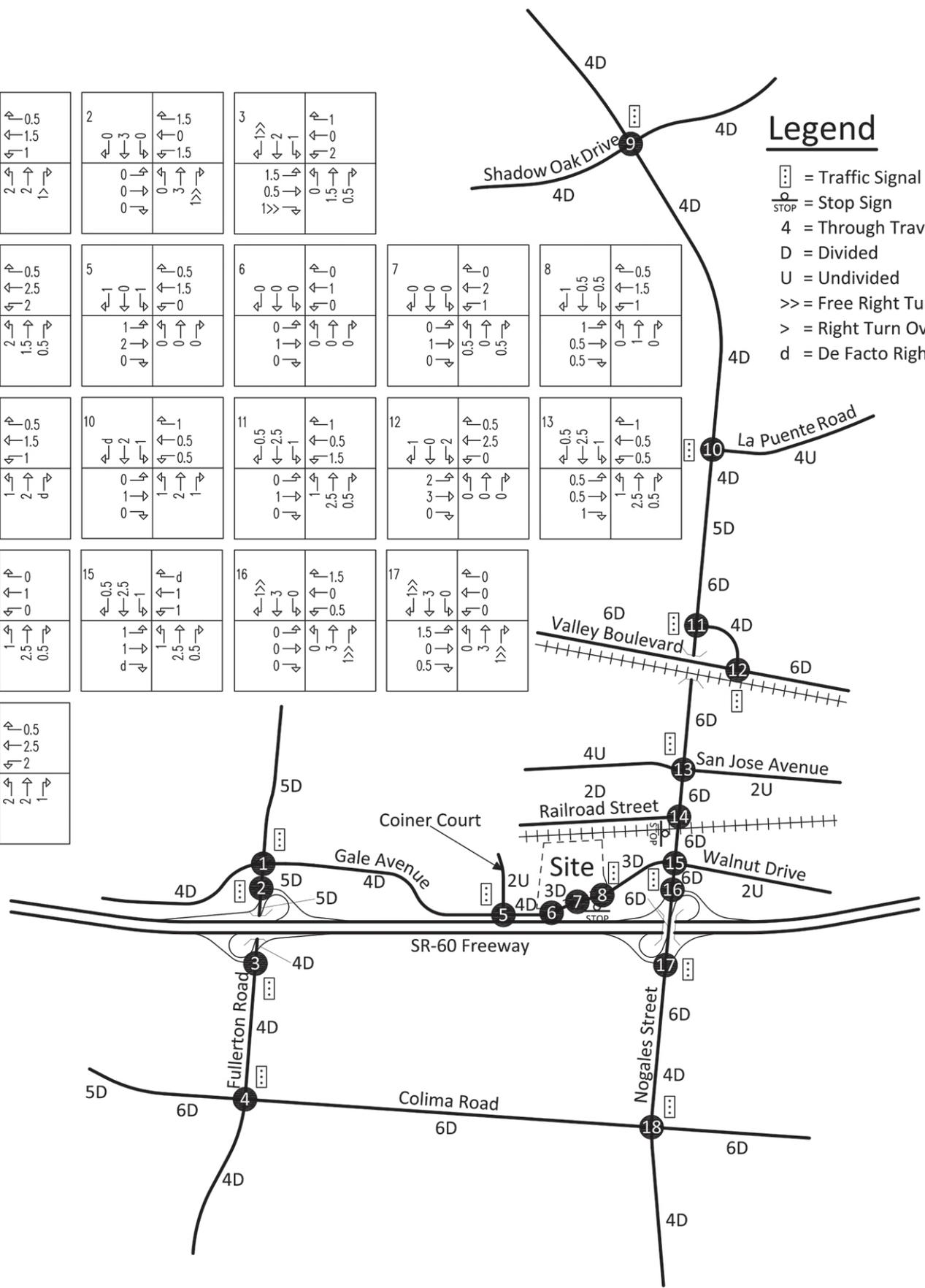
Rowland Heights Plaza and Hotel Project
Source: Kunzman Associates, Inc., 2015.

FIGURE
4.K-1

1	2	3
4	5	6
9	10	11
14	15	16
18		

Legend

- = Traffic Signal
- = Stop Sign
- 4 = Through Travel Lanes
- D = Divided
- U = Undivided
- >> = Free Right Turn
- > = Right Turn Overlap
- d = De Facto Right Turn



Not to scale

Existing Study Area Through Travel Lanes and Intersection Controls

Rowland Heights Plaza and Hotel Project
Source: Kunzman Associates, Inc., 2015.

FIGURE 4.K-2

(i) North-South Roadways

- **Fullerton Road** is a four-lane roadway that transitions to five lanes in the study area. Fullerton Road is classified as a Major Highway on the County of Los Angeles Highway Plan. It currently carries approximately 15,400–27,000 vehicles per day (vpd) in the study area.
- **Coiner Court** provides two undivided lanes in the study area. Coiner Court is not classified on the County of Los Angeles Highway Plan. It currently carries approximately 2,000 vpd in the study area.
- **Nogales Street** provides six divided lanes in the study area. Nogales Street is classified as a Major Highway on the County of Los Angeles Highway Plan. It currently carries approximately 16,400–29,600 vpd in the study area.

(ii) East-West Roadways

- **Shadow Oak Drive** provides four divided lanes in the study area. Shadow Oak Drive is not classified on the County of Los Angeles Highway Plan. It currently carries approximately 4,300–9,300 vpd in the study area.
- **La Puente Road** provides four undivided lanes in the study area. La Puente Road is classified as a Secondary Highway on the County of Los Angeles Highway Plan. It currently carries approximately 10,300 vpd in the study area.
- **Valley Boulevard** currently provides six divided lanes in the study area. Valley Boulevard is classified as a Major Highway on the County of Los Angeles Highway Plan. It currently carries approximately 19,100–21,500 vpd in the study area.
- **San Jose Avenue** provides two to four undivided lanes in the study area. San Jose Avenue is not classified on the County of Los Angeles Highway Plan. It currently carries approximately 6,500–8,600 vpd in the study area.
- **Railroad Street** provides two divided lanes in the study area. Railroad Street is not classified on the County of Los Angeles Highway Plan. It currently carries approximately 1,900 vpd in the study area.
- **Gale Avenue/Walnut Street** provides five to six divided lanes in the study area. Gale Avenue/Walnut Street is not classified on the County of Los Angeles Highway Plan. It currently carries approximately 12,200–19,500 vpd in the study area.
- **Colima Road** provides five to six divided lanes in the study area. Colima Road is classified as a Major Highway on the County of Los Angeles Highway Plan. It currently carries approximately 24,800–26,600 vpd in the study area.

(c) Existing Traffic Volumes and Levels of Service

The selection of study intersections was based on distribution and assignment of Project trips along anticipated travel routes during the weekday morning (7:00 A.M. to 9:00 A.M.) and evening (4:00 P.M. to 6:00 P.M.) peak hours and Saturday mid-day (10:00 A.M. to 2:00 P.M.) peak hour. The peak hour during these timeframes was derived from the four consecutive 15-minute periods with the highest combined volume. The location of the 18 intersections selected for analysis is shown in Figure 4.K-1. Of the 18 intersections studied, 15 intersections are signalized and the remaining three intersections are controlled by STOP signs on the cross street. Study area Intersection No. 6 (Project West Access & Gale Avenue) is proposed as part of the Project and is not present under existing conditions. Intersection No. 7 (Project Central Access & Gale Avenue) is the current intersection of New Charlie Road and Gale Avenue, while Intersection No. 8 (Project

East Access & Gale Avenue) is the current intersection of the temporary shared access driveway and Gale Avenue. Study area Intersection No. 14 (Nogales Street & Railroad Street) would be removed upon completion of the Nogales Street Grade Separation Project. The signalized intersections were analyzed for potential Project impacts in accordance with County standards. The three unsignalized intersections (i.e., Project access points) were analyzed for traffic signal warrants in accordance with County guidelines. The study area intersections (existing and proposed) are as follows:

(ii) Intersections (method of traffic control)

1. Fullerton Road & Gale Avenue (traffic signal)
2. Fullerton Road & SR-60 Freeway Westbound Ramps (traffic signal)
3. Fullerton Road & SR-60 Freeway Eastbound Ramps (traffic signal)
4. Fullerton Road & Colima Road (traffic signal)
5. Coiner Court & Gale Avenue (traffic signal)
6. Project West Access & Gale Avenue (intersection proposed by Project)
7. Project Central Access & Gale Avenue (presently New Charlie Road, cross street stop)
8. Project East Access & Gale Avenue (shared driveway access, traffic signal)
9. Nogales Street & Shadow Oak Drive (traffic signal)
10. Nogales Street & La Puente Road (traffic signal)
11. Nogales Street & Valley Loop Boulevard (traffic signal)
12. Valley Loop Boulevard & Valley Boulevard (traffic signal)
13. Nogales Street & San Jose Avenue (traffic signal)
14. Nogales Street & Railroad Street (cross street stop)
15. Nogales Street & Gale Avenue/Walnut Drive (traffic signal)
16. Nogales Street & SR-60 Freeway Westbound Ramps (traffic signal)
17. Nogales Street & SR-60 Freeway Eastbound Ramps (traffic signal)
18. Nogales Street & Colima Road (traffic signal)

Existing traffic conditions at the 15 signalized intersections were analyzed utilizing the Critical Movement Analysis (CMA) method of intersection capacity, which calculates the volume of traffic traveling through an intersection and compares it to the intersection's capacity. The resulting value is expressed in a volume-to-capacity (V/C) ratio, which, in turn, is interpreted as a LOS measure. LOS is a qualitative measure to describe the condition of traffic flow on the street system. The definitions of the LOS levels and their related V/C ratio

for signalized intersections are shown in **Table 4.K-1, Level of Service Description – Arterial Roadways and Intersections**. The existing service level calculations are shown in **Table 4.K-2, Existing (2013) Service Levels for Study Area Intersections**. As shown, all study area intersections operate at an acceptable LOS (i.e., LOS E or better) during the peak hours under existing traffic conditions.

Table 4.K-1**Level of Service Description – Arterial Roadways and Intersections**

LOS	Traffic Flow Description	V/C
A	Minimal or no vehicle delay.	0.00 – 0.60
B	Slight delay to vehicles.	0.61 – 0.70
C	Moderate vehicle delays, traffic flow remains stable.	0.71 – 0.80
D	More extensive delays at intersections.	0.81 – 0.90
E	Long queues create lengthy delays.	0.91 – 1.00
F	Severe delays and congestion.	> 1.00

V/C = Volume to Capacity ratio

ICU = Intersection Capacity Utilization

Sources: HCM 2010, Congestion Management Program of Los Angeles County

(3) Transit Service

Transit service to the Project Site is provided by Foothill Transit Routes 178, 289, 482, and 493 along Shadow Oak Drive, Nogales Street, La Puente Road, Valley Boulevard, SR-60, and Colima Road. The transit lines within walking distance of the Project Site are Foothill Transit Routes 178 and 289. Foothill Transit Route 178 provides service between the Puente Hills Mall and the El Monte Transit Station, while Route 289 provides service between the Puente Hills Mall and Pomona. Both lines have bus stops along Nogales Street north of Gale Avenue/Walnut Drive, approximately 0.2 mile east of the Project Site. Regional rail service in the Project vicinity is provided by the Southern California Regional Rail Authority's (SCRRA) Metrolink Riverside Route, which provides service between Union Station in Los Angeles and downtown Riverside. The Metrolink Industry Station is located approximately 2.7 miles northeast of the Project Site. **Figure 4.K-3, Transit Serving the Project Site**, depicts the Foothill Transit system map for the Rowland Heights area.

b. Regulatory Framework Summary

(1) Federal

No federal traffic/transportation regulations apply to the Project

Table 4.K-2

Existing (2013) Service Levels for Study Area Intersections^a

ID	N/S Street Name	E/W Street Name	Jurisdiction	Analyzed Periods	Existing (2013) V/C	LOS
1	Fullerton Rd	Gale Ave	Industry	A.M.	0.657	B
				P.M.	0.649	B
				SAT	0.792	C
2	Fullerton Rd	SR-60 Fwy WB Ramps	Caltrans	A.M.	0.537	A
				P.M.	0.471	A
				SAT	0.566	A
3	Fullerton Rd	SR-60 Fwy EB Ramps	Caltrans	A.M.	0.663	B
				P.M.	0.657	B
				SAT	0.847	D
4	Fullerton Rd	Colima Rd	County	A.M.	0.773	C
				P.M.	0.825	D
				SAT	0.841	D
5	Coiner Ct	Gale Ave	Industry	A.M.	0.336	A
				P.M.	0.427	A
				SAT	0.329	A
7	Project Central Access	Gale Ave	County	A.M.	0.308	A
				P.M.	0.380	A
				SAT	0.331	A
8	Project East Access	Gale Ave	County	A.M.	0.316	A
				P.M.	0.411	A
				SAT	0.430	A
9	Nogales St	Shadow Oak Dr	Walnut	A.M.	0.666	B
				P.M.	0.518	A
				SAT	0.522	A
10	Nogales St	La Puente Rd	Los Angeles/ West Covina	A.M.	0.818	D
				P.M.	0.774	C
				SAT	0.774	C
11	Nogales St	Valley Blvd Loop	West Covina	A.M.	0.638	B
				P.M.	0.630	B
				SAT	0.533	A
12	Valley Blvd Loop	Valley Boulevard	West Covina	A.M.	0.565	A
				P.M.	0.399	A
				SAT	0.331	A
13	Nogales St	San Jose Ave	Los Angeles/ Industry	A.M.	0.641	B
				P.M.	0.896	D
				SAT	0.569	A
14	Nogales St	Railroad St	Los Angeles/ Industry	A.M.	0.534	A
				P.M.	0.459	A
				SAT	0.466	A
15	Nogales St	Gale Ave/Walnut Dr	Los Angeles/ Industry	A.M.	0.820	D
				P.M.	1.125	F
				SAT	1.002	F

Table 4.K-2 (Continued)

Existing (2013) Service Levels for Study Area Intersections

ID	N/S Street Name	E/W Street Name	Jurisdiction	Analyzed Periods	Existing (2013) V/C	LOS
16	Nogales St	SR-60 Freeway WB Ramps	Caltrans	A.M.	0.647	A
				P.M.	0.630	A
				SAT	0.631	A
17	Nogales St	SR-60 Freeway EB Ramps	Caltrans	A.M.	0.549	A
				P.M.	0.684	B
				SAT	0.596	A
18	Nogales St	Colima Rd	County	A.M.	0.810	D
				P.M.	0.720	C
				SAT	0.825	D

Notes:

^a Manual vehicle counts were conducted in April 2013, prior to the commencement of the ACE Nogales Street Grade Separation Project, for the weekday morning peak hour, weekday evening peak hour, and Saturday mid-day peak periods. Consequently, "Existing" conditions for purposes of this table and analysis refers not to the date of NOP issuance for this Project, but 2013, when counts were taken.

Source: Kunzman Associates, Inc., December 2015

(2) State**(a) Statewide Transportation Improvement Program**

Caltrans administers transportation programming, which is the public decision-making process that sets priorities and funds projects envisioned in long-range transportation plans. Caltrans commits expected revenues over a multi-year period to transportation projects. The Statewide Transportation Improvement Program (STIP) is a multiyear capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other sources.

(b) Senate Bill 743

Senate Bill 743 (SB 743) was signed by Governor Brown on September 27, 2013. The purpose of SB 743 is to streamline the review under CEQA for several categories of development projects, including the development of infill projects in transit priority areas, and to balance the needs of congestion management with Statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions. The bill adds Chapter 2.7: Modernization of Transportation Analysis for Transit Oriented Infill Projects to the CEQA Statute (Section 21099). Section 21099(d)(1) provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. In addition, SB 743 will result in a change in the metrics for determining impacts relative to the transportation network through the development of new methodologies for traffic analyses for CEQA documents. This promotes the State's goals of reducing greenhouse gas emissions and traffic-related air pollution, promotes the development of multimodal transportation system, and provides clean, efficient access to destinations. Currently, environmental review of transportation impacts focuses on the delay that

vehicles experience at intersections and on roadway segments, which is often measured using LOS. Mitigation for increased delay often involves widening a roadway or the size of an intersection, which increases capacity and may, therefore, increase auto use and emissions and discourage alternative forms of transportation. Under SB 743, the focus of transportation analysis will shift from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses.

SB 743 requires that the Office of Planning and Research (OPR) prepare revisions to the CEQA guidelines criteria for determining the significance of transportation impacts of projects within transit priority areas. OPR will submit the proposed changes to the Secretary of the Natural Resources Agency to certify and adopt. In August 2014, OPR released a report entitled "Updating Transportation Impacts Analysis in the CEQA Guidelines" for public comment. The report contained a new proposed Section 15064.3 to the State CEQA Guidelines as well as proposed amendments to Appendix F (Energy Conservation) and Appendix G (Initial Study Checklist) of the State CEQA Guidelines. The comment period closed November 21, 2014, and OPR is currently reviewing and considering comments to determine if revisions are needed. Upon adoption, the new requirements will apply immediately within transit priority areas and high quality transit corridors and will apply Statewide after January 1, 2016.

(3) Regional

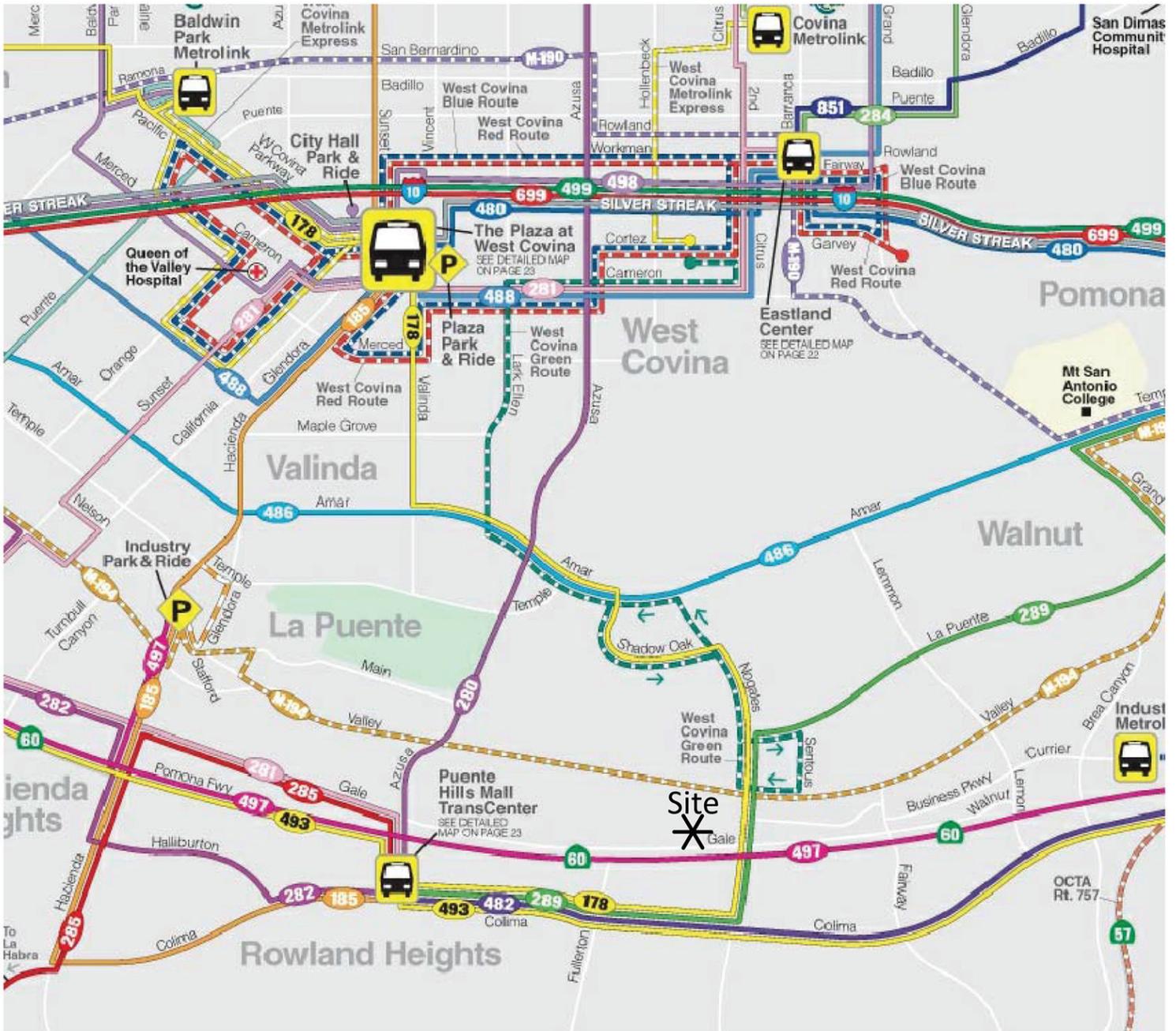
(a) Southern California Association of Governments' Regional Transportation Plan

The Southern California Association of Governments' (SCAG) Regional Transportation Plan (RTP) is a federal- and State-mandated transportation plan that envisions the future multimodal transportation system for the region and provides the basic framework for coordinated, long-term investment in the regional transportation system over the RTP planning horizon of 2035. In compliance with State and federal requirements, SCAG prepares the Regional Transportation Improvement Program (RTIP) to implement projects and programs listed in the RTP. Updated every other year, the RTP lists all transportation projects proposed for the region over a six-year period. Transportation projects proposed in the region are required to be consistent with the RTP and included within the RTIP to be eligible for State or federal funding.

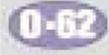
The 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted by SCAG on April 4, 2012. The 2012-2035 RTP/SCS identifies mobility as an important component of a much larger picture with added emphasis on sustainability and integrated planning. In addition, the RTP/SCS includes goals and policies that pertain to mobility, accessibility, safety, productivity of the transportation system, protection of the environment and energy efficiency, and land use and growth patterns that complement the State and region's transportation investments. An integral component of the RTP/SCS is a strong commitment to reduce emissions from transportation sources in order to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards as set forth by the Clean Air Act. For further discussion of air quality and greenhouse gas emissions, see Section 4.B, Air Quality, and Section 4.F, Greenhouse Gas Emissions, respectively, of this EIR.

(b) Los Angeles County Congestion Management Program

The CMP is a State-mandated program enacted by the State legislature to address the increasing concern that urban congestion is affecting the economic vitality of the State and diminishing the quality of life in some



ROUTE DESIGNATIONS

-  Foothill Transit lines are shown with solid route lines
-  Other transit lines are shown with dashed route lines
-  Metro routes have an "M" in the route symbol
-  Omnitrains routes have an "O" in the route symbol



Transit Serving the Project Site

Rowland Heights Plaza and Hotel Project
Source: Kunzman Associates, Inc., 2015.

FIGURE
4.K-3

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communities. The 2010 CMP is the eighth CMP adopted for Los Angeles County since the requirement became effective with the passage of Proposition 111 in 1990. The hallmark of the CMP program is that it is intended to address the impact of local growth on the regional transportation system. Statutory requirements of the CMP include monitoring LOS on the CMP highway and roadway network, measuring frequency and routing of public transit, implementing the Transportation Demand Management and Land Use Analysis Program, and helping local jurisdictions meet their responsibilities under the CMP.

Los Angeles County Metropolitan Transportation Authority (Metro), the local CMP agency, has established a countywide approach to implement the statutory requirements of the CMP in its governing 2010 CMP for Los Angeles County. The CMP identifies a system of highways and roadways with minimum levels of service performance measurements designated at LOS E (unless exceeded in base year conditions) for highway segments and key roadway intersections on this system. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to be in conformance with the countywide plan.

The CMP requires that, when an EIR is prepared for a project, traffic and public transit impact analyses be conducted for select regional facilities based on the quantity of project traffic expected to use those facilities. Mixed-use developments that meet minimum density requirements and that are located within a one-quarter mile radius of a fixed rail station are exempt from CMP analysis. The CMP guidelines state that areas selected for analysis should be those that include the following locations:

- All CMP arterial monitoring intersections, including monitored on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the morning or afternoon weekday peak hours of adjacent street traffic; and
- Mainline freeway monitoring locations where the proposed project will add 150 or more trips, in either direction, during either the morning or afternoon weekday peak hours.

If a project adds more traffic than the minimum threshold amount to an intersection, then that intersection has to be analyzed for deficiencies. The analysis must investigate measures which will mitigate the significant CMP system impacts; develop cost estimates, including the fair share costs to mitigate impacts of the proposed project; and indicate the responsible agency. In Los Angeles County, the monitored intersections are contained in Appendix A of the CMP. None of the study area intersections are designated CMP monitoring locations. The nearest intersection designated as a CMP monitoring location is the intersection of Azusa Avenue and Colima Road, located 2.2 miles southwest of the Project Site.

In Los Angeles County, an impact is considered significant if the project related increase in the V/C ratio equals or exceeds the thresholds shown in **Table 4.K-3, Significance Thresholds for Intersections**.

(c) County of Los Angeles General Plan

(i) Transportation Element

The County's General Plan Transportation Element, adopted in 1980, sets the direction for the development of a comprehensive, coordinated, and continuing transportation system for the County. A consistency analysis of the Project's specific goals and policies with the County's relevant plans, policies, and goals related to transportation and circulation is provided in Section 4.H, Land Use and Planning, of this EIR.

Table 4.K-3

Significance Thresholds for Intersections

Level of Service	Volume/Capacity	Incremental Increase
C	0.71-0.80	0.04 or more
D	0.81-0.90	0.02 or more
E/F	0.91-more	0.01 or more

Source: Los Angeles County Department of Public Works, Traffic Impact Analysis Report Guidelines, 1997.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The traffic impact analysis in this section is based on the Traffic Impact Analysis prepared by Kunzman Associates, Inc. and dated May 29, 2015, and contained in Appendix I-1 of this EIR. The Traffic Impact Analysis and the roadway infrastructure analyzed within were prepared in consultation with LACDPW Traffic and Lighting. The parking impact analysis is based on the Parking Assessment prepared by Linscott Law & Greenspan and dated May 14, 2015, and included in Appendix I-2 of this EIR.

The methodology by which intersection traffic impacts are evaluated involves several steps, including the identification of existing traffic conditions, the determination of future baseline conditions (without Project traffic), the calculation of Project traffic, the assumed distribution of Project traffic to determine the number of Project trips at each intersection, and an evaluation of Project traffic relative to existing and future traffic conditions. Details regarding this methodology are provided in Appendix I-1.

(1) Existing (2013) Traffic Conditions

The technique used to assess the operation of an intersection is known as the Intersection Capacity Utilization (ICU) method. Existing intersection LOS is based upon manual vehicle counts conducted in April 2013, prior to the commencement of the Nogales Street Grade Separation Project, for the weekday morning peak hour, weekday evening peak hour, and Saturday mid-day peak periods. Per discussions with LACDPW Traffic and Lighting, the intersection traffic counts were conducted before Nogales Street was temporarily closed and traffic was redistributed to accommodate the Nogales Street Grade Separation Project; and therefore “existing conditions”, insofar as this traffic study is concerned, reflect conditions in 2013, not 2015 (the year the Project Notice of Preparation was issued).

There are two peak hours in a weekday. The morning peak hour is between 7:00 A.M. and 9:00 A.M., and the evening peak hour occurs between 4:00 P.M. and 6:00 P.M. There is typically one peak hour on a Saturday, between 10:00 A.M. and 2:00 P.M. The actual peak hour within the peak period is the four consecutive 15-minute periods with the highest total volume when all movements are added together. Thus, the weekday evening peak hour at one intersection may be 4:45 P.M. to 5:45 P.M. if those four consecutive 15-minute periods have the highest combined volume. Traffic count worksheets are provided in the Traffic Impact Analysis found in Appendix I-1.

Following the manual counts, an ICU value was assigned to each intersection. An ICU value is expressed as a V/C ratio decimal. The decimal represents that portion of the hour required to provide sufficient capacity to accommodate all intersection traffic if all approaches operate at capacity, effectively representing the traffic using the intersection compared with the capacity of the intersection. The ICU values were then interpreted to reflect LOS conditions. LOS is a qualitative measure to describe the condition of traffic flow on the street system. The definitions of the LOS levels and their related V/C ratio for signalized intersections are shown in Table 4.K-1.

(2) Trip Generation

Project trip generation was determined using rates and procedures contained in the Institute of Transportation Engineers, *Trip Generation*, 9th Edition, 2012. Trips generated by the Project (Project trips) were calculated by multiplying a land use's trip generation rate by the proposed quantity (for example, square footage or number of hotel rooms) of that land use. Trip generation rates were determined for daily traffic, weekday morning peak hour inbound and outbound traffic, weekday evening peak hour inbound and outbound traffic, and Saturday mid-day peak hour inbound and outbound traffic for the proposed land uses.

Pass-by trips are intermediate stops at the Project Site during existing or previously planned trips. These intermediate stops may be for a planned purpose (such as a visit to a retail store on the way home from work), or they may be spur-of-the-moment "impulse" trips. Accounting for these adjustments more realistically reflects the fact that some trips related to the Project would be multipurpose trips, and that some Project trips are already on the street system for another purpose and therefore, would not contribute additional traffic to the surrounding roadway network. In summary, pass-by trips do not contribute additional traffic to the roadway network because no new trips are produced, and the reduction for pass-by trips from the Project are not used to analyze the Project driveways and intersections immediately adjacent to the Project Site. The pass-by trips methodology and estimation are outlined in the Institute of Transportation Engineers, *Trip Generation Handbook*, Chapter 5, 2004 (refer to Appendix F of the Traffic Impact Analysis). A pass-by trip rate of 10 percent was considered appropriate for the Project, based on consultation with LACDPW Traffic and Lighting.

The trip-reducing potential of public transit was not considered in evaluation of the Project's traffic impacts. Thus, the Project's traffic projections are conservative in that public transit and the private bus fleet would reduce the traffic volumes.

(3) Trip Distribution

The geographic distribution of trips generated by the Project is based on an evaluation of the street system serving the Project Site, the level of accessibility of routes to and from the Project Site, and the locations of employment and commercial centers to which Project visitors would be drawn. To determine the trip distributions, peak hour traffic counts of the existing directional distribution of traffic for existing areas in the vicinity of the Project Site and other additional information on future development and traffic impacts in the area were reviewed. The Project's trip distribution was then confirmed with LACDPW Traffic and Lighting.

(4) Existing (2013) Plus Project Traffic Conditions

For signalized intersections, the Traffic Impact Analysis compares the projected LOS at each study intersection under the existing (2013) baseline and the existing baseline plus Project conditions to estimate the incremental increase in the V/C ratio caused by the Project. This increase is compared to significance criteria to determine whether such increases would be significant. The baseline conditions, project trip generation, and trip distribution methodologies are discussed above. The estimated Project traffic was added to the existing traffic volumes to estimate the changes in V/C ratios (or delay time for the unsignalized intersection) and/or related LOS levels based on the ICU technique. The Project's added increment was compared to the significance thresholds noted below. The Existing (2013) Plus Project conditions were analyzed to comply with the *Sunnyvale West Neighborhood Association v. City of Sunnyvale* court ruling. This scenario is provided for informational purposes only and was not used for impact determinations or mitigation.

The three unsignalized intersections in the study area (the proposed Project access driveways) were evaluated for traffic signals using the Caltrans Warrant 3 Peak Hour traffic signal warrant analysis, as specified in the *California Manual of Uniform Traffic Control Devices* (2014 Edition).

(5) Future (2020) With Project Plus Cumulative Traffic Conditions

Future (2020) With Project Plus Cumulative Traffic conditions were analyzed in accordance with LACDPW Traffic and Lighting's established guidelines, which require that the analysis of traffic impacts be based on the Project's opening year (buildout and occupancy of both Project Phases 1 and 2) and cumulative conditions.³ The guidelines specify that Project impacts are to be evaluated based on opening year traffic conditions. Accordingly, cumulative impacts are evaluated based on opening year with related (cumulative) projects to determine the Project's fair share of future improvements. Cumulative impacts are evaluated based on the existing condition plus Project Plus Cumulative conditions to determine whether increases in V/C ratios and/or LOS would be significant under these conditions, as well as to determine the Project's fair share of future infrastructure improvement costs. Three related projects in the Project vicinity expected to be developed after the Project has been constructed. To assess Future (2020) With Project Plus Cumulative Traffic conditions, existing (2013) traffic is combined with related projects. To determine the related projects, a list of permits filed within the past five years was obtained from the County of Los Angeles Department of Regional Planning and was reviewed to determine which projects could potentially add traffic to the study area intersections. These data were reviewed in May 2015. Related projects that could result in impacts within the study area were considered to be those within one mile of the Project Site. The Future (2020) With Project Plus Cumulative Traffic scenario reflects cumulative conditions. Cumulative impacts were identified for locations where traffic will exceed the specified impact threshold, and the Project's fair-share percentage of the necessary mitigation was determined. Depiction of the known cumulative projects in the Project vicinity that have been included within the buildout/cumulative database are illustrated in **Figure 3-1, Related Projects Map**.

³ Per the December 2014 Memorandum of Understanding approved by the LACDPW Traffic and Lighting Division, which defines the scope of the Traffic Impact Analysis, no annual ambient or background growth factor was incorporated into analysis of future conditions, since the Project area is entirely built out. See Appendix B of the Traffic Impact Analysis, provided in Appendix I-1 of this Draft EIR, for a copy of the Memorandum of Understanding.

(6) Parking Facilities

The adequacy of on-site parking was evaluated in a Parking Assessment prepared by Linscott Law & Greenspan in May 2015 and based on the requirements of the County Parking Code (Section 22.52 of the Los Angeles County Code [LACC]) and procedures outlined by the Urban Land Institute (ULI) in the technical document *Shared Parking* (2005).

Parking demand forecast was first prepared for the Project in accordance with County Parking Code requirements for the individual uses as if they were “stand-alone” development to determine the actual parking demand that could be reasonably anticipated. Then, the baseline parking rates were adjusted based on the methodology outlined in ULI’s *Shared Parking* to account for variations in parking demand that occur throughout the day, as well as during the week. The concept of shared parking is that if the proposed land uses have peak parking demands at different times of day, or on different days of the week, then the number of spaces required is less than the sum of that required by the County Parking Code for each of the individual land uses. For example, at a typical hotel, the highest demand for parking associated with the guest rooms typically occurs at night when nearly all hotel guests are at the Project Site for the evening. Parking demand during the day at hotels—when many hotel guests are offsite—is substantially less. Thus, the ULI document provides hour-by-hour parking profiles (or indices) for land uses such as hotels expressed as a percentage of peak demand. For hotels, it is assumed that the guest rooms would generate 100 percent of their peak parking demand at 12:00 A.M. (midnight). However, during the daytime, the amount of parking generated by the guest rooms is much less (e.g., 55 percent of peak demand at 12:00 P.M. noon). Thus, a parking space used by a hotel guest in the evening can be used (shared) with a parker associated with another component of the Project (e.g., retail) that has a peak daytime parking demand. Hotel weekday demand was assumed to be 100 percent of peak demand, while Saturday demand was assumed to be 86 percent of peak demand.

Related to retail uses, there are differing levels of parking demand in comparing weekdays to Saturdays. Most retail uses generate their highest parking demand during the afternoon on a Saturday. (As determined by the LACC, this would be equivalent to one parking space for every 250 square feet of retail floor area. The peak weekday parking demand for retail is approximately 10 percent less than the peak weekend parking demand, as noted to the *Shared Parking* document.) Correspondingly, retail parking demand was assumed to have its highest peak hour on Saturdays; weekday parking demand was assumed to be 90 percent of peak.

With respect to restaurants on the Project Site, a diversity of restaurant types is anticipated to occupy the proposed retail condominium spaces, and building design has been developed to accommodate this. Some are likely to serve lunch and accommodate the considerable daytime employee population, which would mean they generate their highest parking demand at mid-day during the week. Other restaurants may only be open for dinner, after retail stores have closed for the day. In this way, peak parking demand for the different restaurants in the Commercial Center is not expected to occur at one time of day, or one day of the week, and instead demand would be staggered.

Finally, the *Shared Parking Analysis* rates for “captive” markets, which generate fewer parking spaces as compared to a “stand-alone” use, were applied to the Project’s parking demand. For example, restaurants located within a hotel typically generate a demand for fewer parking spaces compared to similar restaurants developed on a single site or even located within a commercial center. This is because: 1) many customers of these ancillary restaurant uses are expected to be guests of the hotel (where parking needs are already

accounted for in the hotel parking requirement), and 2) being located in the same facility allows for the sharing of employees, storage, and other back-of-house functions that cannot occur in stand-alone facilities. Accordingly, the baseline parking rates related to the ancillary uses of the full-service Hotel A on Parcel 2 (i.e., the restaurant and function space) were reduced by 30 percent to account for captive market considerations. This is considered conservative relative to accepted industry parking rates for this land use, as stated in the Parking Assessment provided in Appendix I-2 of this Draft EIR. (By comparison, the City of West Hollywood Municipal Code allows for up to a 50 percent reduction in the regular City Code parking requirements for ancillary uses at hotels).

With regard to restaurant space, the Project's restaurant floor plans (and therefore associated occupancy loads for each restaurant unit) are not currently designed, and therefore each unit's occupancy load is not yet known. The Parking Assessment conservatively assumed the projected 1,561-person restaurant occupancy would encompass no less than 40,113 square feet of floor area (based on County guidance regarding assumed occupancy of restaurant space). As outlined in Subsection c., Project Characteristics or Design Features, PDF-TRAF-3 is proposed as a Project condition of approval to limit the Commercial Center's (Parcel 1) total maximum permitted occupancy load for all restaurant uses to 1,561 persons; the design feature/proposed condition also would limit the total floor area for restaurant space (including customer and kitchen areas to no more than 40,113 square feet.⁴ Should the restaurant floor area exceed 40,113 square feet at the Commercial Center, the condition would state that a corresponding reduction in retail floor area would be required to reduce parking demand associated with the Commercial Center as a whole.

For the 20,000 square feet of floor area in the Commercial Center that could be developed as either medical office or retail floor area, the Parking Assessment, to provide a conservative analysis, examined the weekday parking demand assuming the area is occupied by medical office tenants (which has a higher parking demand ratio than retail uses) and the Saturday parking demand assuming the space occupied by retail tenants.

The hour-by-hour parking demand indices for weekdays and Saturdays as provided in the *Shared Parking* document were applied to the adjusted baseline parking rates. The results of the shared parking analysis were then compared to the proposed parking spaces to determine if the proposed parking would be adequate to accommodate Project parking demand.

b. Thresholds of Significance

The potential for traffic and parking impacts is based on thresholds derived from Los Angeles County Department of Regional Planning Initial Study Checklist screening questions, which are based in part on Appendix G of the State *CEQA Guidelines*. These questions are as follows:

⁴ See Table 4.K-9, *County Parking Code Requirements*.

17. Transportation/Traffic. Would the project:

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- b. Conflict with an applicable congestion management program (CMP), including, but not limited to, level of service standards and travel demand measures, or other standards established by the CMP for designated roads and highways?
- c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e. Result in inadequate emergency access?
- f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The Initial Study determined that the Project would have no impact or less than significant impacts with respect to c), a change in air traffic patterns. This environmental topic is not evaluated in this EIR.

Based on these factors, the Project would have a potentially significant impact related to traffic, transportation, and parking if it would:

- TRAF-1** Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.
- TRAF-2** Conflict with an applicable congestion management program (CMP), including but not limited to level of service standards and travel demand measures, or other standards established by the CMP for designated roads and highways.
- TRAF-3** Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- TRAF-4** Result in inadequate emergency access.
- TRAF-5** Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or parking supply, or otherwise decrease the performance or safety of such facilities.

c. Project Characteristics or Design Features

(1) Project Construction

Project Design Feature PDF-TRAF-1 would ensure construction-related traffic management is conducted throughout the construction phases. This Project Design Feature would reduce the potential for conflicts between Project construction traffic and other pedestrian and vehicular traffic in the Project vicinity, as well as potential interference with emergency access.

PDF-TRAF-1: Prior to the issuance of grading permits, the Project Applicant, in coordination with LACDPW, will prepare a Construction Staging and Traffic Management Plan to be implemented during construction of the Project. The Construction Staging and Traffic Management Plan will identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of construction activities associated with the Project. The Construction Staging and Traffic Management Plan will also consider construction traffic and associated construction traffic noise from nearby simultaneous construction activities and pedestrian safety related to school routes. The Construction Staging and Traffic Management Plan will be subject to final approval by LACDPW.

(2) Project Site Access

As shown in Figure 2-4, *Conceptual Site Plan*, vehicular access to the Project Site would be provided directly from Gale Avenue via an ingress/egress driveway on the proposed parcel boundary between Parcel 1 and Parcels 2 and 3 (Intersection No. 7); this would serve as the primary Project Site entrance. Access would also be provided via a new ingress/egress driveway into Parcels 2 and 3 along the western Project Site boundary (Intersection No. 6). The primary Project Site entrance would provide access to both hotels via a shared entry plaza, and to Parcel 1 aligned with the hotel entry plaza. A new driveway would also provide access to Parcel 1 from the existing shared driveway with the Rowland Heights Plaza Shopping Center to the east (Intersection No. 8). As discussed in detail in Subsection d, Project Impacts, below, the Traffic Impact Analysis concluded that a traffic signal would be warranted at the primary ingress/egress driveway at Gale Avenue (Intersection No. 7). Project Design Feature PDF-TRAF-2 would ensure that a three-way traffic signal is installed as part of Project construction. The Project's southbound driveway approach would provide dedicated right- and left-turn lanes onto Gale Avenue.

PDF-TRAF-2: The Project Applicant will install a three-way traffic signal at the primary Project Site entrance and Gale Avenue (Intersection No. 7), to provide traffic control for westbound/eastbound Gale Avenue and the southbound ingress/egress Project driveway.

(3) Project Parking Supply

The Project Applicant has a parking permit to allow fewer parking spaces than are required by the County Parking Code; the request is based upon the Project shared-parking characteristics described above. The parking permit procedure is established to provide an alternative to the County's Parking Code requirements in the event that a particular use does not have the need for such requirements.

The Project would provide a total of 1,161 parking spaces. On Parcel 1 for the Commercial Center, 689 parking spaces would be provided, including 506 surface parking spaces and 183 spaces in single-level subterranean structures beneath Building Nos. 2, 3, and 4. On Parcel 2 for Hotel A, 260 parking spaces would

be provided, including 137 surface parking spaces and 123 spaces within a single subterranean level. On Parcel 3 for Hotel B, 137 parking spaces would be provided, including 74 surface parking spaces and 63 spaces within a single subterranean level. (See Figure 2-4 for proposed parking locations.) An additional 75 surface parking spaces would be provided on the parcel in the City of Industry and would be counted toward fulfillment of the County's Parking Code requirement for the Project, with 55 spaces allocated to the Commercial Center and 20 spaces assigned to Hotel B. The parcel in the City of Industry would also provide a private drive aisle to allow private and emergency response vehicle access between Parcel 1 and Parcels 2 and 3. (The Project Applicant will own and control the parcel in the City of Industry.)

Subterranean parking beneath Building No. 4 would be accessed via a ramp on the building's eastern side directly from the shared driveway with the Rowland Heights Plaza Shopping Center. Parking beneath Building No. 3 would be accessed via a ramp on the building's southern side. Parking beneath Building No. 2 would be accessed via a ramp on the building's northern side. Parking beneath Hotel A on Parcel 2 would be accessed by a ramp near the building's southwestern corner, and parking beneath Hotel B on Parcel 3 would be accessed via a ramp just north of the building.

Restaurant floor plans within the proposed Commercial Center have not yet been developed, pending finalization of tenant selection. To ensure predictable analysis of the Project's potential environmental impacts, the Project Applicant proposes Project Design Feature PDF-TRAF-3, which would become a condition of approval, to limit the total number of restaurant patrons and overall floor area. Specifically, the condition of approval would limit the Commercial Center's total maximum permitted occupancy load for all restaurant uses to 1,561 and the minimum floor area to no less than 40,113 square feet. When restaurant floor plans are submitted for Director's Review, the plans may result in occupancy loads that are greater than the above assumptions. In such an event, the Project Applicant would be required to decrease retail floor area in an amount corresponding to the increased area of restaurant space, in terms of parking demand. The Project proposes to limit this potential corresponding increase in restaurant floor area to an absolute maximum restaurant floor area of 47,000 square feet. PDF-TRAF-3 is proposed to ensure that Project parking demand and supply are predictable as the Commercial Center is occupied and that impacts remain less than significant.

PDF-TRAF-3: The Commercial Center's maximum permitted occupancy load for all restaurant uses will never exceed 1,561 occupants (including both customer and staff), and total restaurant floor area will not be less than 40,113 square feet nor more than 47,000 square feet. Restaurant occupancy loads will be determined by the County Division of Building and Safety in accordance with the California Building Code in effect at the time when restaurant floor plans are submitted for Director's Review, as required by the Department of Regional Planning. Restaurant occupancy restrictions will be controlled through the Commercial Center Association's CC&R. The Commercial Center Association (as maintained by the property manager) will:

- Keep records of each restaurant unit's maximum occupancy load;
- Track the Commercial Center's total occupancy load; and
- Have the authority to enforce each restaurant unit's maximum permitted occupancy load.

- Prior to applying for Director’s Review, each restaurant unit owner will obtain written authorization from the Commercial Center Association that confirms the occupancy load sought for permit complies with that unit’s maximum permitted occupancy in accordance with the CC&R. Restaurant owners will be prohibited from applying for a permit that seeks an occupancy load in excess of what is allowed or building out a unit in excess of that unit’s permitted maximum occupancy.
- Once the Commercial Center Association has approved restaurant uses within the Commercial Center with a total of 1,561 occupants, no further restaurant uses may be approved by the Commercial Center Association. Occupant loads may be reallocated among restaurant unit owners with the prior approval of the Commercial Center Association (and such approvals from the County and Director’s Review as are required by the County), but under no circumstances will the total occupant load for all restaurant uses in the Commercial Center exceed 1,561 occupants.

d. Project Impacts

(1) Intersections and Parking

Threshold TRAF-1: Would the Project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Impact Statement TRAF-1: *Project-related construction traffic would result in less than significant impacts on pedestrian and bicycle paths, and mass transit in the Project vicinity with implementation of Project Design Feature PDF-TRAF-1. Under Future (2020) With Project Plus Cumulative Traffic conditions, impacts would exceed the applicable County significance threshold at five intersections (five intersections exceeding the Saturday mid-day peak hour threshold; one of these intersections also exceeds the A.M. and P.M. weekday peak hour thresholds). This would be a significant impact at these intersections.*

(a) Project Construction

The number of construction workers and construction equipment would vary throughout the construction process. The construction workforce likely would come from all parts of the County and is assumed to arrive and depart from all directions. Construction traffic generally occurs prior to the peak period (7:00 A.M. – 9:00 A.M. and 4:00 P.M. – 6:00 P.M.). Consistent with the typical construction work day, most employees would arrive to the Project Site between 6:30 A.M. and 7:00 A.M. for daily meetings and planning purposes (noting that construction equipment would not be utilized until after 7:00 A.M.). Most workers would be expected to leave the Project Site between 3:30 P.M. and 4:00 P.M., although some could leave during the weekday afternoon peak traffic hour. Regardless of the timing during the weekday afternoon peak hour, the construction employee trips would be short term and in consideration of the number of potential trips, would not be anticipated to substantially affect the performance of the circulation system during peak traffic periods. Construction worker parking would be accommodated within the construction area of the Project and not on public streets.

The Project grading plan proposes the export of approximately 130,350 cubic yards of soil during construction. As such, haul truck trips associated with export soils would be required. Haul trucks are

anticipated to utilize Gale Avenue to Nogales Street, where they would be anticipated to travel south to SR-60. Site excavation would occur after the completion of the Nogales Street Grade Separation Project, which would make capacity improvements to Intersection No. 15 (Gale Avenue and Nogales Street/Walnut Drive).

Heavy equipment to be utilized on site during construction would include, but not be limited to flat beds, dozers, scrapers, graders, small utility tractors, track hoes, dump trucks, cement trucks, pavers, rubber-tired compactors, rollers, water trucks, rolling container trucks and bobcats. Heavy equipment would be delivered and removed from the Project Site throughout the construction phase. As most heavy equipment is typically not authorized to be driven on a public roadway, most of the equipment would be delivered and removed via large flatbed trucks. It is anticipated that delivery of heavy equipment would not occur on a daily basis, but rather periodically throughout the construction phase based on need.

Project construction would be ongoing for a minimum of 24 months, assuming maximum overlap between Phases 1 and 2, and would include some off-site improvements such as utility connections and roadway improvements, including a new traffic signal at the primary entrance driveway. Implementation of Project Design Feature PDF-TRAF-1 would ensure that Project-related construction traffic, including worker travel and the delivery of construction materials and equipment, would not adversely affect pedestrian routes or transportation safety in the Project vicinity. Therefore, construction traffic impacts would be less than significant.

(b) Project Operation

(i) Project Trip Generation

Trip generation represents the amount of traffic that is both attracted to and produced by a development. Trip generation rates used to estimate Project traffic and a summary of the Project's trip generation are shown on **Table 4.K-4, Project Trip Generation**. As shown in Table 4.K-4, the Project would generate 10,357 average daily trips, including 541 trips (312 inbound/229 outbound) during the weekday morning peak hour, 846 trips (449 inbound/397 outbound) during the afternoon weekday peak hour, and 1,092 trips (566 inbound/526 outbound) during the Saturday mid-day peak hour.

External vehicle trips refer to those trips added to the roadway system as a result of Project implementation. It includes all trips associated with the Project uses, less vehicles otherwise already passing the Project Site that stop-off on the way to other places, referred to as "pass-by trips" in Table 4.K-4.

(ii) Project Trip Distribution

Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that would be utilized by Project traffic, as discussed in Subsection 3.a.(3), Trip Distribution above. As shown on **Figures 4.K-4 through 4.K-11**, with the exception of hotel trips, approximately 35 percent of inbound and outbound Project trips would be distributed west on Gale Avenue to Fullerton Street, while 65 percent of Project trips would be distributed east toward Nogales Street. For all uses except the hotel uses, 35 percent of Project inbound/outbound Project trips would be distributed south of SR-60, 30 percent on SR-60 (15 percent westbound, 15 percent eastbound), 30 percent on Nogales Street north of Gale Avenue/Walnut Drive, and 5 percent on Fullerton Drive north of Gale Avenue. For hotel uses, 40 percent of Project trips would be distributed on SR-60 (20 percent westbound, 20 percent eastbound), 30 percent south of SR-60,

Table 4.K-4

Project Trip Generation

Land Use	Size	Estimated Trip Generation ^a									
		Average Daily Trips ^a	Weekday AM Peak Hour Trips			Weekday PM Peak Hour Trips			Sat Mid-Day Peak Hour Trips		
			In	Out	Total	In	Out	Total	In	Out	Total
Shopping Center	83,707 sf	3,574	50	30	80	149	162	311	210	193	403
High-Turnover Restaurant	20,056 sf	2,550	119	97	216	119	79	198	121	133	254
Quality Restaurant	20,057 Sf	1,804	8	8	16	101	50	151	128	89	217
Hotel	477 r	4,255	186	134	320	162	172	334	210	205	415
Office	2,000 sf	7	1	0	1	0	1	1	0	0	0
Total Vehicle Trips		12,190	364	269	633	531	464	995	669	620	1,289
Pass-By (10%)		(1,219)	(36)	(27)	(63)	(53)	(46)	(99)	(67)	(62)	(129)
Commercial Internal Capture (5%)		(179)	(3)	(2)	(5)	(7)	(8)	(15)	(11)	(10)	(21)
Restaurant Internal Capture (10%)		(435)	(13)	(11)	(24)	(22)	(13)	(35)	(25)	(22)	(47)
Total Project Trips		10,357	312	229	541	449	397	846	566	526	1,092

^a Source for trip generation rates: Trip Generation, 9th Edition, Institute of Transportation Engineers (ITE), 2012, Land Use Categories 310,710,820, and 932.

Source: Kunzman Associates, Inc., December 2015

25 percent on Nogales Street north of Gale Avenue/Walnut Drive, and 5 percent on Fullerton Road north of Gale Avenue.

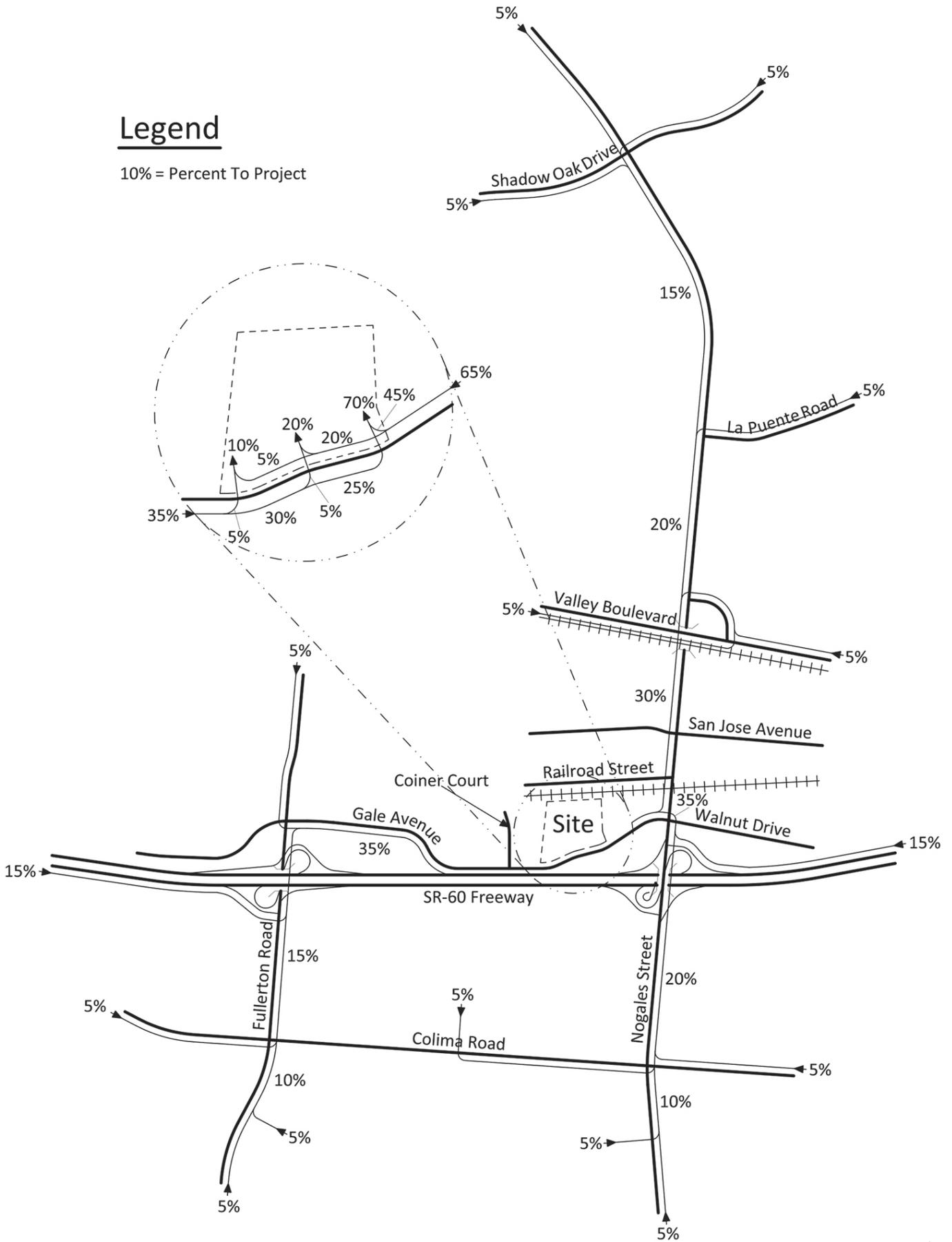
(iii) Existing (2013) Plus Project Conditions

Signalized Intersections

The Existing (2013) Plus Project conditions were analyzed to comply with the *Sunnyvale West Neighborhood Association v. City of Sunnyvale* CEQA court case. This scenario is provided for informational purposes only and was not used for impact determination. As shown in Table 4.K-4, the Project would add additional vehicle trips to the surrounding roadway network. The Project's daily traffic volumes on the surrounding roadway network during the weekday morning, weekday afternoon, and Saturday mid-day peak hours under existing conditions are depicted in **Figures 4.K-12 to 4.K-14**. The peak hour ICU values that correspond to the existing traffic conditions are included in **Table 4.K-5, Existing (2013) Plus Project – Service Levels for Signalized Intersections**. Table 4.K-5 compares the Existing (2013) Conditions and the Existing (2013) Plus Project conditions. As shown in Table 4.K-5, the study intersections are forecast to operate at an acceptable LOS (LOS "E" or better) under Existing (2013) Plus Project conditions, with the exception of Intersection No. 15 (Nogales Street at Gale Avenue/Walnut Drive), which would operate at LOS F during weekday afternoon and Saturday mid-afternoon peak hours.

Legend

10% = Percent To Project



N
Not to scale

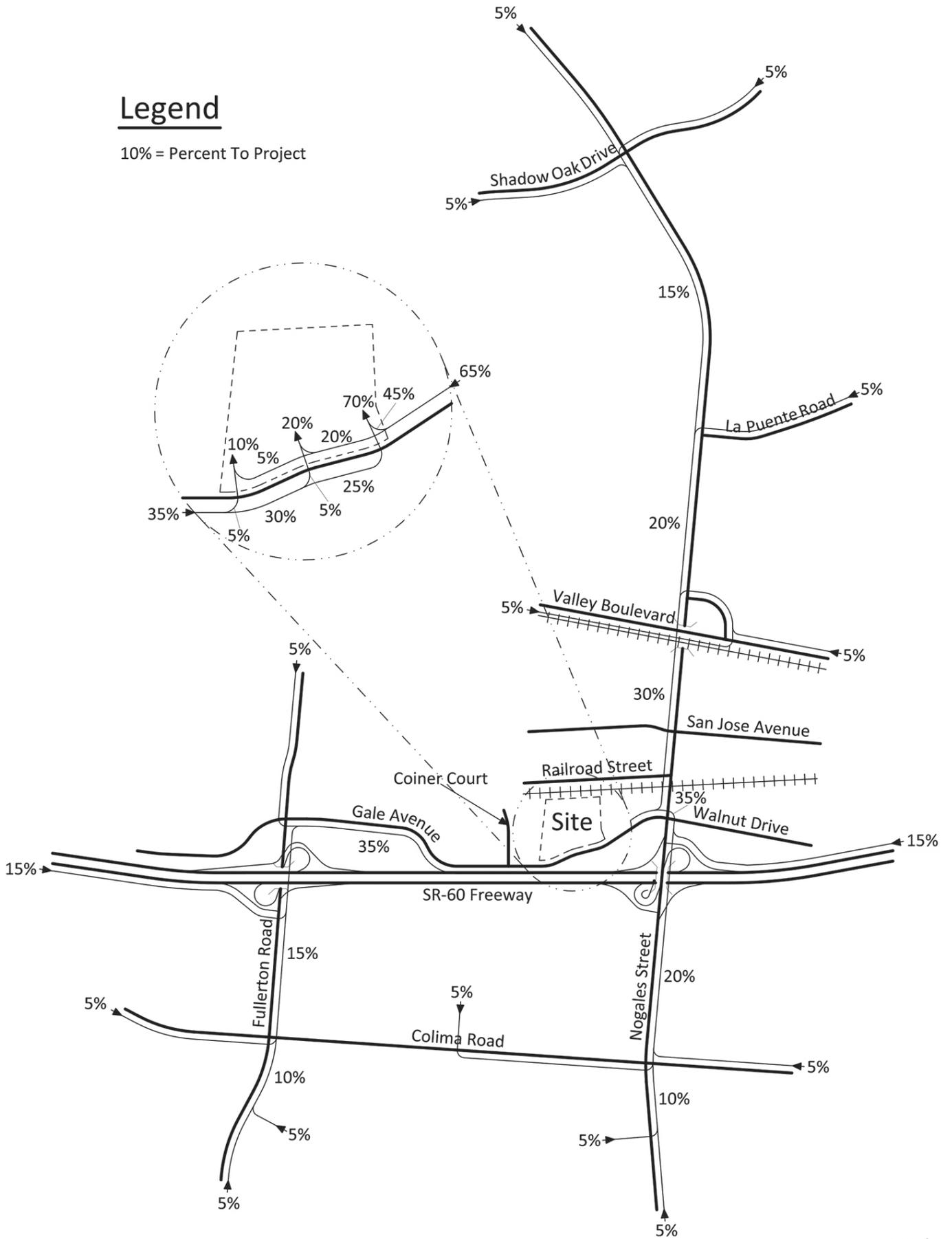
Project Inbound Trip Distribution – Retail Uses

Rowland Heights Plaza and Hotel Project
Source: Kunzman Associates, Inc., 2015.

FIGURE
4.K-5

Legend

10% = Percent To Project



N
Not to scale

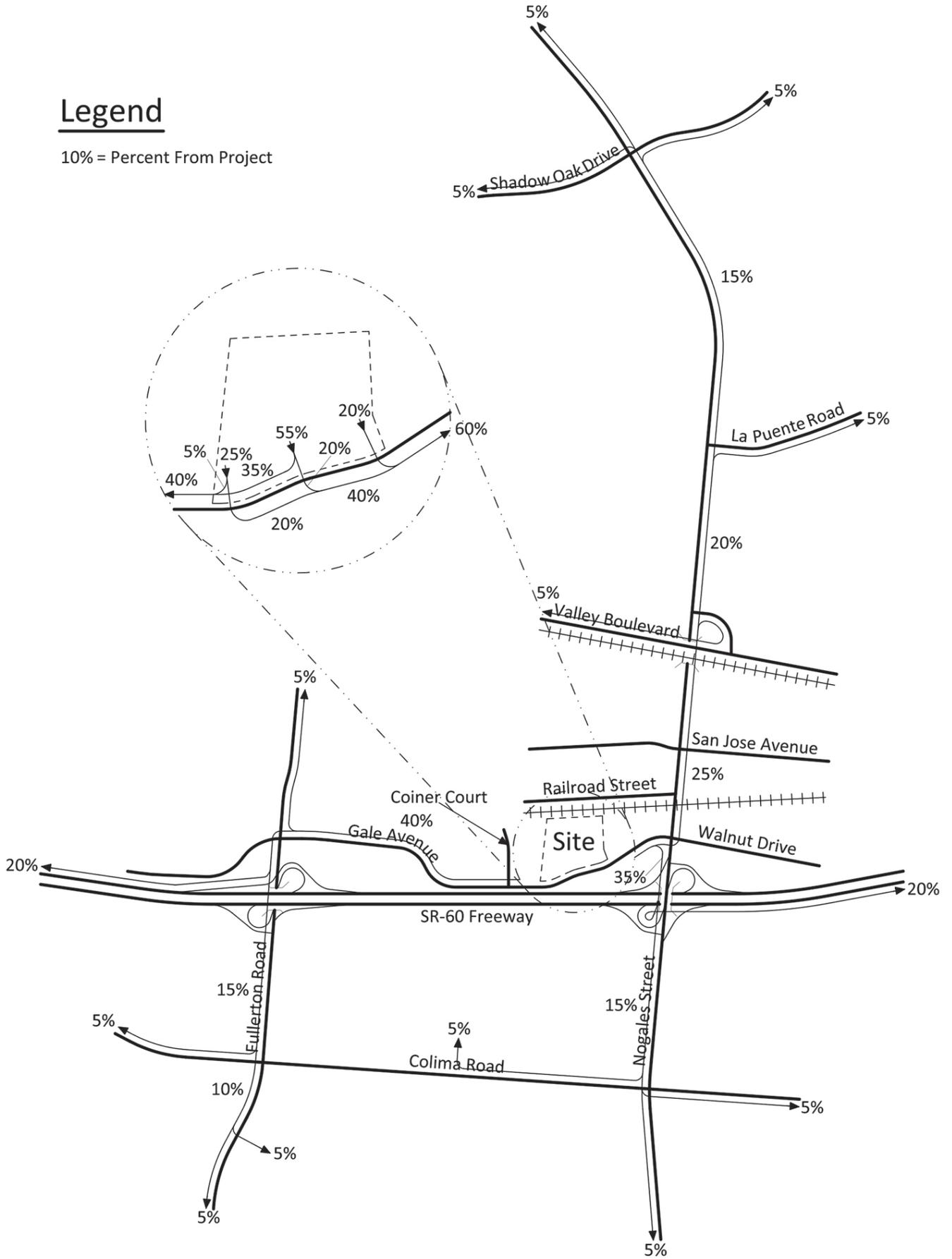
Project Inbound Trip Distribution – Restaurant Uses

Rowland Heights Plaza and Hotel Project
Source: Kunzman Associates, Inc., 2015.

FIGURE
4.K-7

Legend

10% = Percent From Project



N
Not to scale

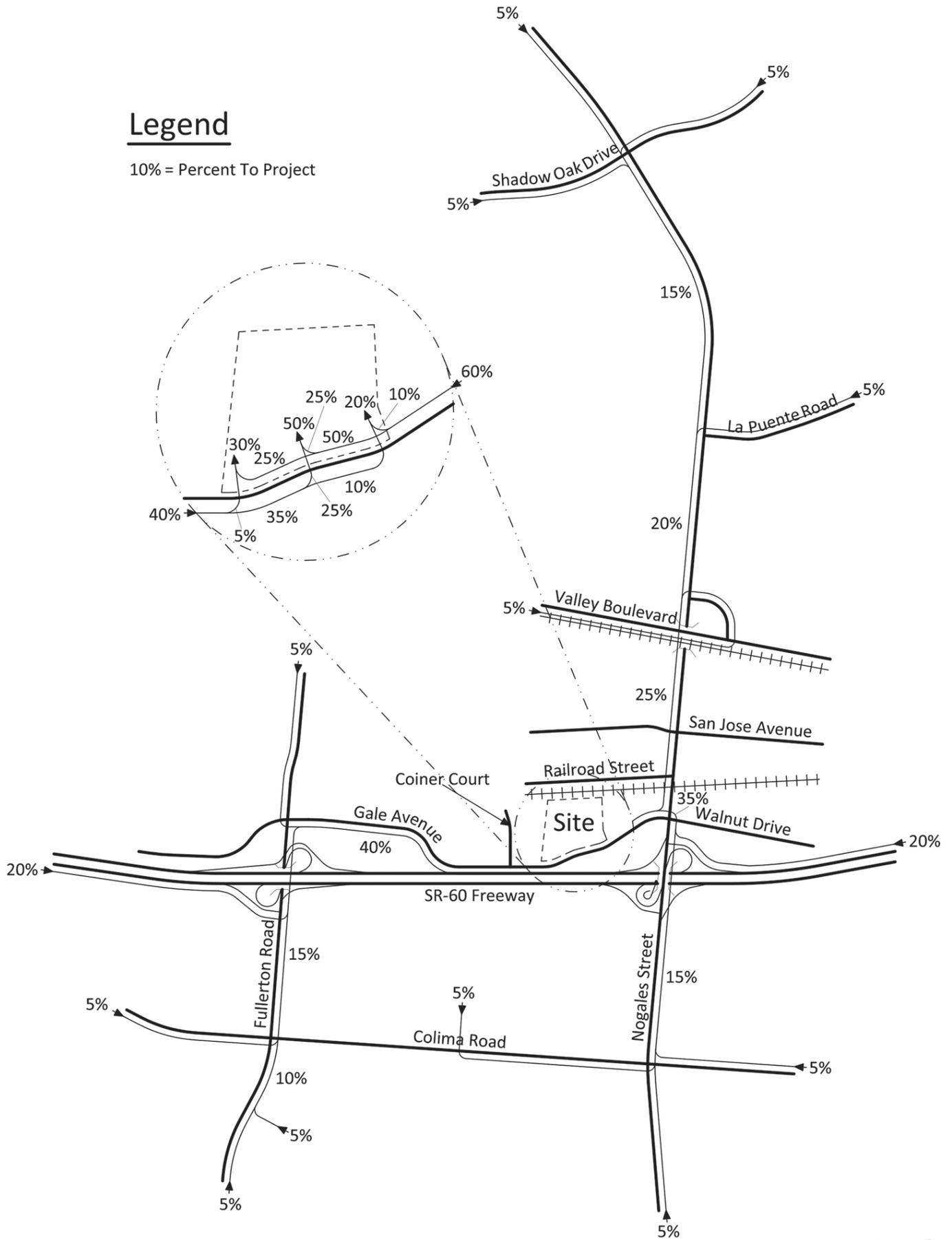
Project Outbound Trip Distribution – Hotel Uses

Rowland Heights Plaza and Hotel Project
Source: Kunzman Associates, Inc., 2015.

FIGURE
4.K-8

Legend

10% = Percent To Project



N
Not to scale

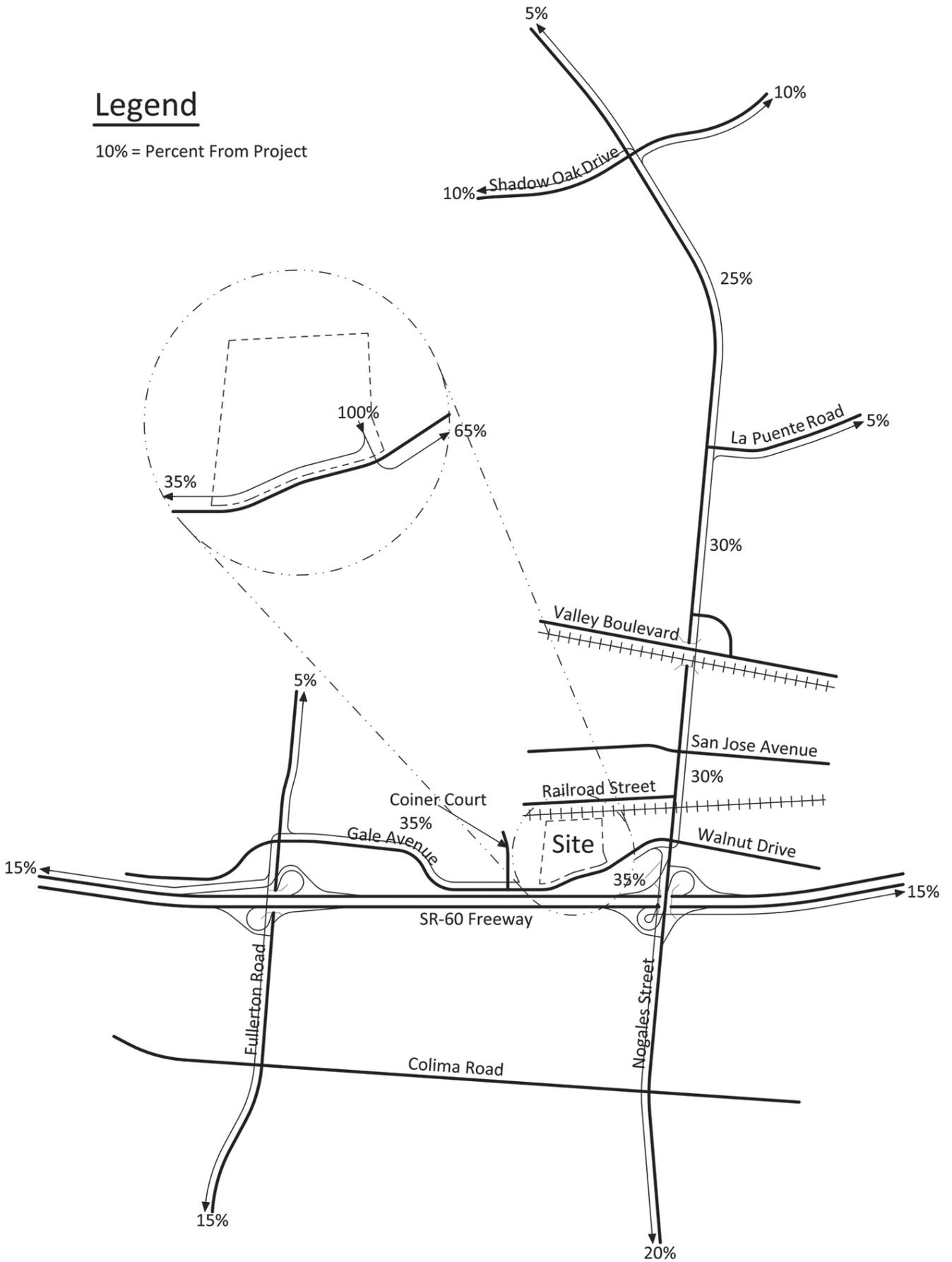
Project Inbound Trip Distribution – Hotel Uses

Rowland Heights Plaza and Hotel Project
Source: Kunzman Associates, Inc., 2015.

FIGURE
4.K-9

Legend

10% = Percent From Project



Not to scale

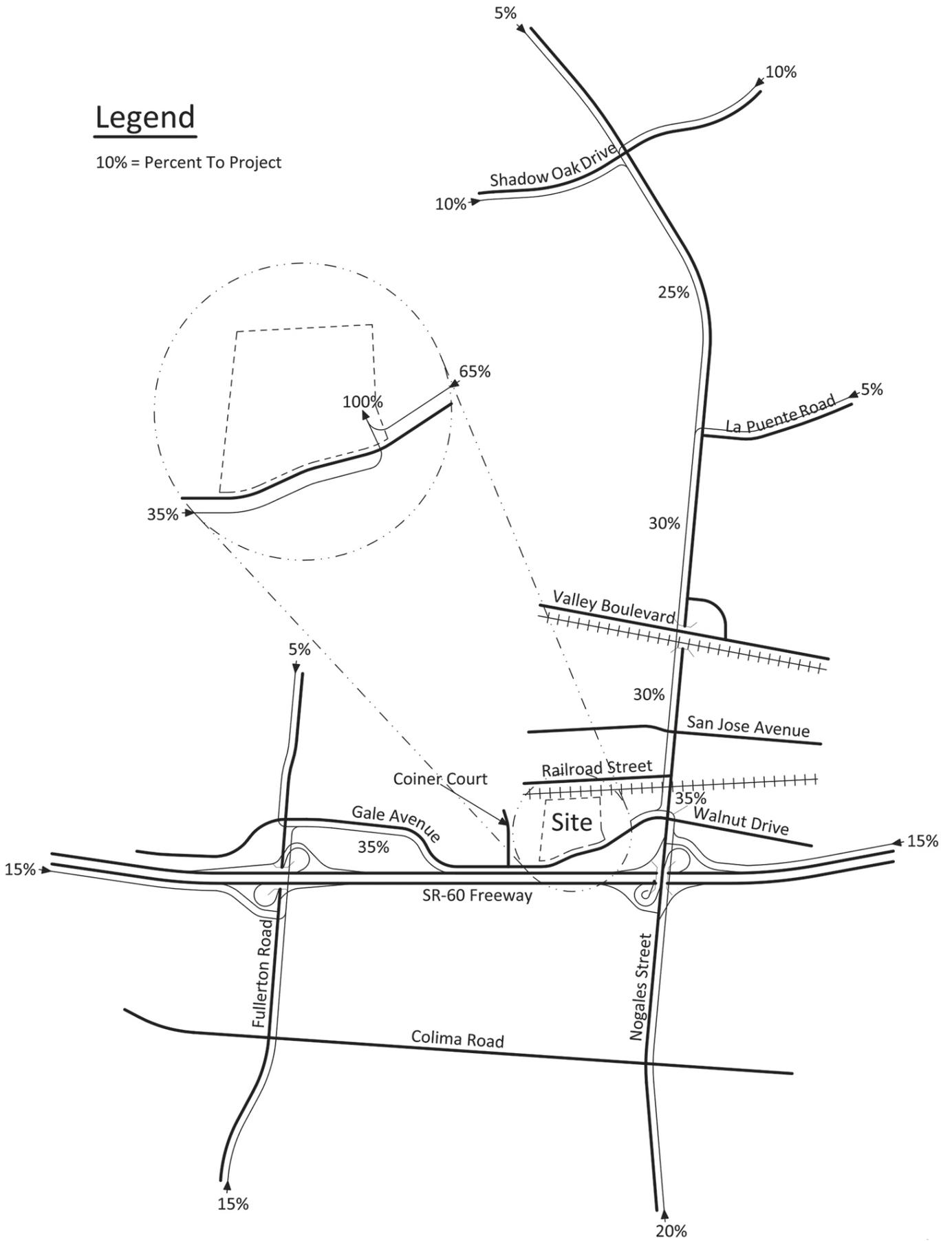
Project Outbound Trip Distribution – Office Uses

Rowland Heights Plaza and Hotel Project
Source: Kunzman Associates, Inc., 2015.

FIGURE
4.K-10

Legend

10% = Percent To Project



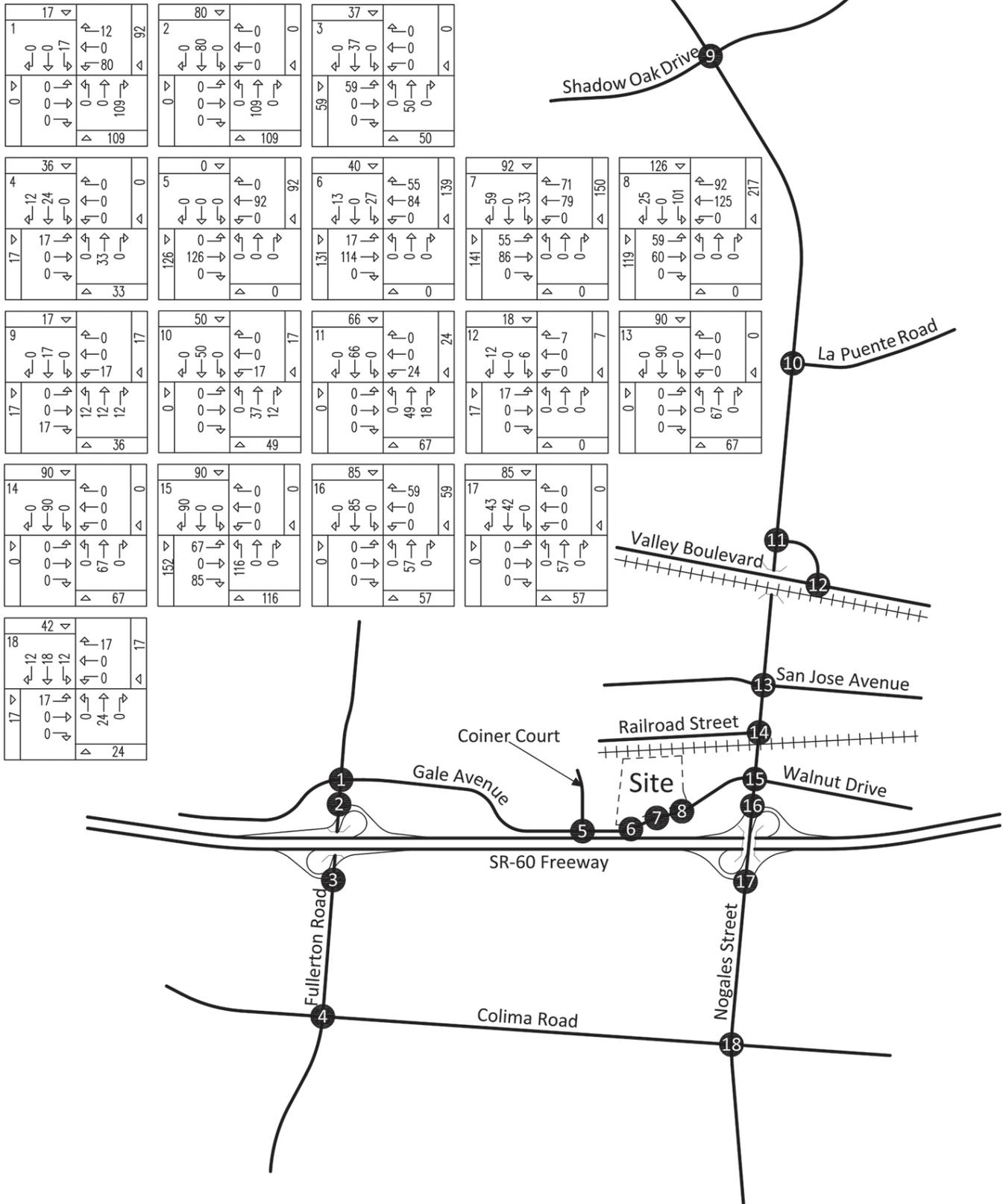
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Project Inbound Trip Distribution – Office Uses

Rowland Heights Plaza and Hotel Project
Source: Kunzman Associates, Inc., 2015.

FIGURE

4.K-11

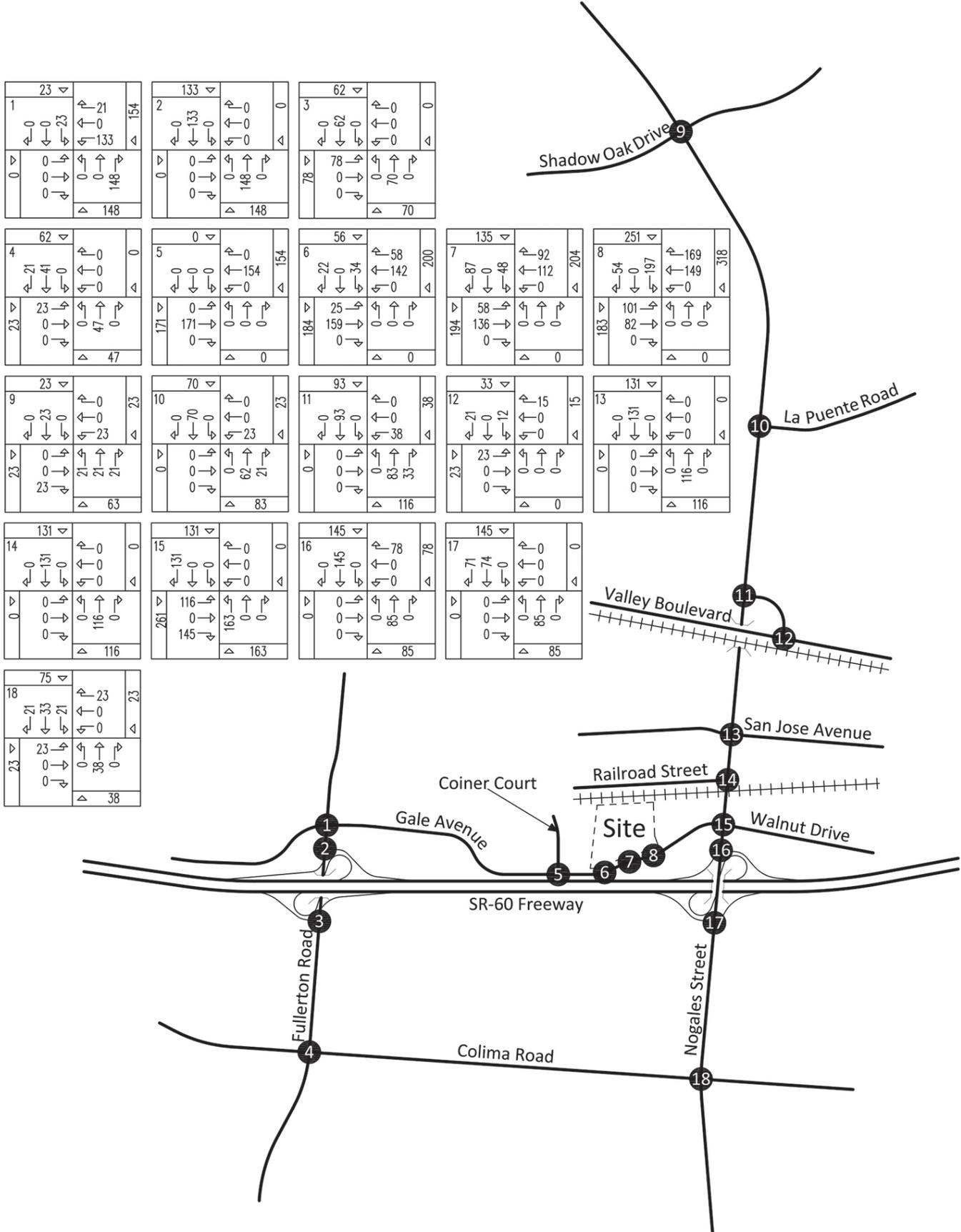


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Project Intersection Turning Movement Volumes – Weekday Morning Peak Hour

Rowland Heights Plaza and Hotel Project
Source: Kunzman Associates, Inc., 2015.

FIGURE
4.K-12

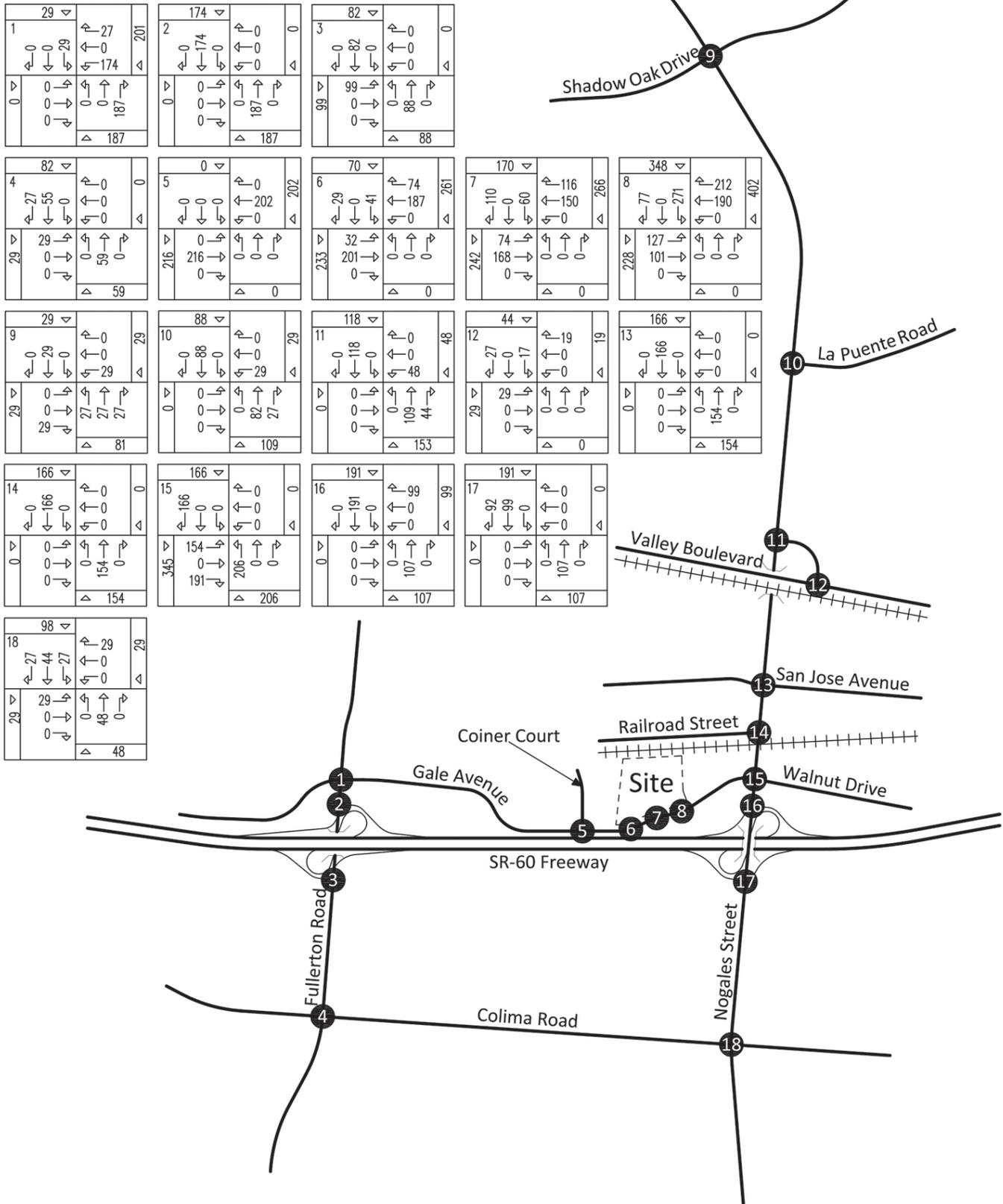


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Project Intersection Turning Movement Volumes – Weekday Afternoon Peak Hour

Rowland Heights Plaza and Hotel Project
Source: Kunzman Associates, Inc., 2015.

FIGURE
4.K-13



Not to scale

Project Intersection Turning Movement Volumes- Saturday Mid-Day Peak Hour

Rowland Heights Plaza and Hotel Project
Source: Kunzman Associates, Inc., 2015.

FIGURE
4.K-14

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Table 4.K-5

Existing (2013) Plus Project Service Levels for Signalized Intersections

ID	N/S Street Name	E/W Street Name	Peak Period	Existing (2013) Plus Project									
				Existing (2013)		Without Improvements				With Improvements			
				V/C	LOS	V/C	LOS	Project Impact	Sig Impact	V/C	LOS	Project Impact	Sig Impact
1	Fullerton Rd	Gale Ave	A.M.	0.657	B	0.672	B	0.015	No	0.672	B	0.015	No
			P.M.	0.649	B	0.730	C	0.081	YES	0.656	B	0.007	No
			SAT	0.792	C	0.878	D	0.086	YES	0.801	D	0.009	No
2	Fullerton Rd	SR-60 Fwy WB Ramps	A.M.	0.537	A	0.561	A	0.024	No	-	-	-	-
			P.M.	0.471	A	0.499	A	0.028	No	-	-	-	-
			SAT	0.566	A	0.604	A	0.038	No	-	-	-	-
3	Fullerton Rd	SR-60 Fwy EB Ramps	A.M.	0.663	B	0.698	B	0.035	No	0.556	A	-0.107	No
			P.M.	0.657	B	0.705	C	0.048	YES	0.557	A	-0.010	No
			SAT	0.847	D	0.907	E	0.060	YES	0.737	C	-0.110	No
4	Fullerton Rd	Colima Rd	A.M.	0.773	C	0.791	C	0.018	No	-	-	-	-
			P.M.	0.825	D	0.840	D	0.015	No	-	-	-	-
			SAT	0.841	D	0.878	D	0.037	YES	-	-	-	-
5	Coiner Ct	Gale Ave	A.M.	0.336	A	0.368	A	0.032	No	-	-	-	-
			P.M.	0.427	A	0.488	A	0.061	No	-	-	-	-
			SAT	0.329	A	0.401	A	0.072	No	-	-	-	-
9	Nogales St	Shadow Oak Dr	A.M.	0.666	B	0.702	C	0.036	No	-	-	-	-
			P.M.	0.518	A	0.569	A	0.051	No	-	-	-	-
			SAT	0.522	A	0.585	A	0.063	No	-	-	-	-
10	Nogales St	La Puente Rd	A.M.	0.818	D	0.848	D	0.030	YES	-	-	-	-
			P.M.	0.774	C	0.808	D	0.034	YES	-	-	-	-
			SAT	0.774	C	0.819	D	0.045	YES	-	-	-	-
11	Nogales St	Valley Blvd Loop	A.M.	0.638	B	0.654	B	0.016	No	-	-	-	-
			P.M.	0.630	B	0.655	B	0.025	No	-	-	-	-
			SAT	0.533	A	0.566	A	0.033	No	-	-	-	-
12	Valley Blvd Loop	Valley Blvd	A.M.	0.565	A	0.581	A	0.016	No	-	-	-	-
			P.M.	0.399	A	0.415	A	0.016	No	-	-	-	-
			SAT	0.331	A	0.363	A	0.032	No	-	-	-	-
13	Nogales St	San Jose Ave	A.M.	0.641	B	0.661	B	0.020	No	-	-	-	-
			P.M.	0.896	D	0.921	E	0.025	No	-	-	-	-
			SAT	0.569	A	0.606	B	0.037	No	-	-	-	-
15	Nogales St	Gale Ave/ Walnut Dr	A.M.	0.820	D	0.934	E	0.114	YES	-	-	-	-
			P.M.	1.125	F	1.358	F	0.233	YES	-	-	-	-
			SAT	1.002	F	1.291	F	0.289	YES	-	-	-	-
16	Nogales St	SR-60 Fwy WB Ramps	A.M.	0.647	B	0.679	B	0.032	No	-	-	-	-
			P.M.	0.630	B	0.663	B	0.033	No	-	-	-	-
			SAT	0.631	B	0.699	B	0.068	No	-	-	-	-
17	Nogales St	SR-60 Fwy EB Ramps	A.M.	0.549	A	0.562	A	0.013	No	-	-	-	-
			P.M.	0.684	B	0.701	C	0.017	No	-	-	-	-
			SAT	0.596	A	0.618	B	0.022	No	-	-	-	-
18	Nogales St	Colima Rd	A.M.	0.810	B	0.841	C	0.031	YES	-	-	-	-
			P.M.	0.720	A	0.752	B	0.032	No	-	-	-	-
			SAT	0.825	B	0.868	C	0.043	YES	-	-	-	-

Source: Kunzman Associates, Inc., December 2015

As shown in Table 4.K-5, Project traffic would exceed County LOS thresholds at the following seven intersections under Existing (2013) Plus Project conditions:

1. Fullerton Road & Gale Avenue
 - LOS B (0.649) to LOS C (0.730), an increase in the V/C ratio of 0.081, during the weekday P.M. peak hour
 - LOS C (0.792) to LOS D (0.878), an increase in the V/C ratio of 0.801, during the Saturday mid-day peak hour
3. Fullerton Road & SR-60 Freeway EB Ramps
 - LOS B (0.657) to LOS C (0.705), an increase in the V/C ratio of 0.048, during the weekday p.m. peak hour
 - LOS C (0.847) to LOS D (0.907), an increase in the V/C ratio of 0.060, during the Saturday mid-day peak hour
4. Fullerton Road & Colima Road
 - LOS D (0.841) to LOS D (0.878), an increase in the V/C ratio of 0.037, during the Saturday mid-day peak hour
10. Nogales Street & La Puente Road
 - LOS D (0.818) to LOS D (0.848), an increase in the V/C ratio of 0.030, during the weekday a.m. peak hour
 - LOS C (0.774) to LOS D (0.808), an increase in the V/C ratio of 0.034, during the weekday p.m. peak hour
 - LOS C (0.774) to LOS D (0.819), an increase in the V/C ratio of 0.045, during the Saturday mid-day peak hour
15. Nogales Street & Gale Avenue/Walnut Drive
 - LOS D (0.820) to LOS E (0.934), an increase in the V/C ratio of 0.114, during the weekday a.m. peak hour
 - LOS F (1.125) to LOS F (1.358), an increase in the V/C ratio of 0.233, during the weekday p.m. peak hour
 - LOS F (1.002) to LOS F (1.291), an increase in the V/C ratio of 0.289, during the Saturday mid-day peak hour
18. Nogales Street & Colima Road
 - LOS B (0.810) to LOS C (0.8414), an increase in the V/C ratio of 0.031, during the weekday a.m. peak hour
 - LOS B (0.825) to LOS C (0.868), an increase in the V/C ratio of 0.043, during the Saturday mid-day peak hour

Signal Warrant Analysis

The Traffic Impact Analysis concluded that based on the volume of traffic anticipated, traffic signals are projected to be warranted at the following study area intersections for Existing (2013) Plus Project traffic conditions:

7. Project West Access & Gale Avenue
8. Project East Access & Gale Avenue

Subsequent to the completion of the traffic counts for the Traffic Impact Analysis, a traffic signal was installed at Intersection No. 8 (Project East Access & Gale Avenue). This traffic signal would remain following completion of the Project. With the continued operation of the traffic signal, Project impacts at Intersection No. 8 would be less than significant during the Existing (2013) Plus Project conditions.

As outlined in the discussion of Project Characteristics above, the Project Applicant proposes installation of a traffic signal at Intersection No. 7 (Project West Access & Gale Avenue). The proposed traffic signal would be a three-way signal providing traffic control for westbound/eastbound Gale Avenue and the southbound ingress/egress driveway. The southbound approach would provide dedicated left-turn and right-turn lanes within the Project Site. With the implementation of the proposed traffic signal at Intersection No. 7, per Project Design Feature PDF-TRAF-2, impacts would remain less than significant under Existing (2013) Plus Project conditions. Project impacts related to warranted traffic signals would be less than significant under Existing (2013) Plus Project conditions.

(iv) Future (2020) With Project Plus Cumulative Traffic Conditions

Signalized Intersections

In addition to the Project trips shown in Table 4.K-4, under Future with Project Plus Cumulative conditions, vehicle trips are assumed to be added to the study area by related projects within a one-mile radius of the Project Site. Per LACDPW requirements, the Project and related projects are evaluated to determine cumulative Project impacts.

Traffic trips generated by the related projects are outlined in **Table 4.K-6, Related Project Trip Generation**. As shown, the related projects would generate 689 average daily trips, including 51 trips (29 inbound/22 outbound) during the weekday morning peak hour, 55 trips (32 inbound/ 23 outbound) during the weekday afternoon peak hour, and 754 trips (30 inbound/35 outbound) during the Saturday mid-day peak hour.

The peak hour ICU values that correspond with the Future (2020) With Project Plus Cumulative Traffic conditions are included within **Table 4.K-7, Future (2020) With Project Plus Cumulative Traffic Conditions – Service Levels for Signalized Intersections**. Table 4.K-7 compares the Existing (2013) Conditions and the Future (2020) With Project Plus Cumulative Traffic conditions. As shown in Table 4.K-7, the study intersections are forecast to operate at acceptable levels of service (LOS “E” or better) under the Future (2020) With Project Plus Cumulative Traffic conditions, with the exception of Intersection No. 15 (Nogales Street at Gale Avenue/Walnut Drive), which would operate at LOS F during the weekday p.m. and Saturday mid-afternoon peak hours. Although still operating at an acceptable level of service, the Project would also result in potentially significant impacts based on County thresholds during the Saturday mid-day peak hour at five other study area intersections. Specifically, without improvements, the Project would result in

Table 4.K-6

Related Project Trip Generation

ID	Land Use	Size	Average Daily Trips	Estimated Trip Generation								
				Weekday AM Peak Hour Trips			Weekday PM Peak Hour Trips			Sat Mid-Day Peak Hour Trips		
				In	Out	Total	In	Out	Total	In	Out	Total
1	Restaurant	828 sf	<u>105</u>	<u>5</u>	<u>4</u>	<u>9</u>	<u>5</u>	<u>3</u>	<u>8</u>	<u>6</u>	<u>5</u>	<u>116</u>
	<i>Subtotal</i>		105	5	4	9	5	3	8	6	5	116
2	Specialty Retail	3,481 sf	149	2	1	3	6	7	13	9	8	166
	Medical/Dental Office	2,216 sf	20	1	0	1	1	2	3	1	1	22
	Restaurant	2,306 sf	<u>293</u>	<u>14</u>	<u>11</u>	<u>25</u>	<u>14</u>	<u>9</u>	<u>23</u>	<u>17</u>	<u>15</u>	<u>325</u>
	<i>Subtotal</i>		462	17	12	29	21	18	39	27	24	513
3	Retail	(1,319) sf	(56)	(1)	0	(1)	(2)	(3)	(5)	(3)	(3)	(62)
	Restaurant	1,319 sf	<u>168</u>	<u>8</u>	<u>6</u>	<u>14</u>	<u>8</u>	<u>5</u>	<u>13</u>	<u>10</u>	<u>9</u>	<u>187</u>
	<i>Subtotal</i>		122	7	6	13	6	2	8	7	6	125
	Total		689	29	22	51	32	23	55	40	35	754

Source: Kunzman Associates, Inc., December 2015

potentially significant impacts at the following seven intersections under Future (2020) With Project Plus Cumulative conditions:

1. Fullerton Road & Gale Avenue
 - LOS B (0.649) to LOS C (0.731), an increase in the V/C ratio of 0.082, during the weekday p.m. peak hour
 - LOS C (0.792) to LOS D (0.879), an increase in the V/C ratio of 0.087, during the Saturday mid-day peak hour

3. Fullerton Road & SR-60 Freeway EB Ramps
 - LOS B (0.663) to LOS C (0.713), an increase in the V/C ratio of 0.530, during the weekday a.m. peak hour
 - LOS B (0.657) to LOS C (0.732), an increase in the V/C ratio of 0.075, during the weekday p.m. peak hour
 - LOS D (0.847) to LOS (0.931), an increase in the V/C ratio of 0.084, during the Saturday mid-day peak hour

4. Fullerton Road & Colima Road
 - LOS D (0.825) to LOS D (0.847), an increase in the V/C ratio of 0.022, during the weekday p.m. peak hour
 - LOS D (0.841) to LOS (0.885), an increase in the V/C ratio of 0.044, during the Saturday mid-day peak hour

Table 4.K-7

**Future (2020) With Project Plus Cumulative Traffic Conditions
Service Levels for Signalized Intersections**

ID	N/S Street Name	E/W Street Name	Peak Period	Future (2020) With Project Plus Cumulative									
				Existing (2013)		Without Improvements				With Improvements			
				V/C	LOS	V/C	LOS	Project Impact	Significant Impact	V/C	LOS	Project Impact	Significant Impact
1	Fullerton Rd	Gale Ave	A.M.	0.657	B	0.673	B	0.016	No	0.673	B	0.016	No
			P.M.	0.649	B	0.731	C	0.082	YES	0.657	B	0.008	No
			SAT	0.792	C	0.879	D	0.087	YES	0.802	D	0.010	No
2	Fullerton Rd	SR-60 Fwy WB Ramps	A.M.	0.537	A	0.562	A	0.025	No	-	-	-	-
			P.M.	0.471	A	0.501	A	0.030	No	-	-	-	-
			SAT	0.566	A	0.606	B	0.040	No	-	-	-	-
3	Fullerton Rd	SR-60 Fwy EB Ramps	A.M.	0.663	B	0.713	C	0.050	YES	0.569	A	-0.094	No
			P.M.	0.657	B	0.732	C	0.075	YES	0.573	A	-0.084	No
			SAT	0.847	D	0.931	E	0.084	YES	0.759	C	-0.088	No
4	Fullerton Rd	Colima Rd	A.M.	0.773	C	0.796	C	0.023	No	-	-	-	-
			P.M.	0.825	D	0.847	D	0.022	YES	-	-	-	-
			SAT	0.841	D	0.885	D	0.044	YES	-	-	-	-
5	Coiner Ct	Gale Ave	A.M.	0.336	A	0.368	A	0.032	No	-	-	-	-
			P.M.	0.427	A	0.488	A	0.061	No	-	-	-	-
			SAT	0.329	A	0.401	A	0.072	No	-	-	-	-
9	Nogales St	Shadow Oak Dr	A.M.	0.666	B	0.702	C	0.036	No	-	-	-	-
			P.M.	0.518	A	0.569	A	0.051	No	-	-	-	-
			SAT	0.522	A	0.585	A	0.063	No	-	-	-	-
10	Nogales St	La Puente Rd	A.M.	0.818	D	0.848	D	0.030	YES	-	-	-	-
			P.M.	0.774	C	0.808	D	0.034	YES	-	-	-	-
			SAT	0.774	C	0.819	D	0.045	YES	-	-	-	-
11	Nogales St	Valley Blvd Loop	A.M.	0.638	B	0.654	B	0.016	No	-	-	-	-
			P.M.	0.630	B	0.655	B	0.025	No	-	-	-	-
			SAT	0.533	A	0.566	A	0.033	No	-	-	-	-
12	Valley Blvd Loop	Valley Blvd	A.M.	0.565	A	0.581	A	0.016	No	-	-	-	-
			P.M.	0.399	A	0.415	A	0.016	No	-	-	-	-
			SAT	0.331	A	0.363	A	0.032	No	-	-	-	-
13	Nogales St	San Jose Ave	A.M.	0.641	B	0.661	B	0.020	No	-	-	-	-
			P.M.	0.896	D	0.921	E	0.025	YES	-	-	-	-
			SAT	0.569	A	0.606	B	0.037	No	-	-	-	-
15	Nogales St	Gale Ave/ Walnut Dr	A.M.	0.820	D	0.934	E	0.114	YES	-	-	-	-
			P.M.	1.125	F	1.358	F	0.233	YES	-	-	-	-
			SAT	1.002	F	1.291	F	0.289	YES	-	-	-	-
16	Nogales St	SR-60 Fwy WB Ramps	A.M.	0.647	B	0.679	B	0.032	No	-	-	-	-
			P.M.	0.630	B	0.663	B	0.033	No	-	-	-	-
			SAT	0.631	B	0.700	B	0.069	No	-	-	-	-
17	Nogales St	SR-60 Fwy EB Ramps	A.M.	0.549	A	0.562	A	0.013	No	-	-	-	-
			P.M.	0.684	B	0.701	C	0.017	No	-	-	-	-
			SAT	0.596	A	0.618	B	0.022	No	-	-	-	-
18	Nogales St	Colima Rd	A.M.	0.810	D	0.841	D	0.031	YES	-	-	-	-
			P.M.	0.720	C	0.753	C	0.033	No	-	-	-	-
			SAT	0.825	B	0.871	D	0.046	YES	-	-	-	-

Source: Kunzman Associates, Inc., December 2015

10. Nogales Street & La Puente Road
 - LOS D (0.818) to LOS D (0.848), an increase in the V/C ratio of 0.030, during the weekday a.m. peak hour
 - LOS C (0.774) to LOS D (0.808), an increase in the V/C ratio of 0.034, during the weekday p.m. peak hour
 - LOS C (0.774) to LOS D (0.819), an increase in the V/C ratio of 0.045, during the Saturday mid-day peak hour

13. Nogales Street & San Jose Avenue
 - LOS D (0.896) to LOS E (0.921), an increase in the V/C ratio of 0.025, during the Saturday mid-day peak hour

15. Nogales Street & Gale Avenue/Walnut Drive
 - LOS D (0.820) to LOS E (0.934), an increase in the V/C ratio of 0.114, during the weekday a.m. peak hour
 - LOS F (0.896) to LOS F (0.921), an increase in the V/C ratio of 0.025, during the weekday p.m. peak hour
 - LOS F (1.002) to LOS F (1.291), an increase in the V/C ratio of 0.289, during the Saturday mid-day peak hour

18. Nogales Street & Colima Road
 - LOS D (0.810) to LOS D (0.841), an increase in the V/C ratio of 0.031, during the weekday a.m. peak hour
 - LOS B (0.825) to LOS D (0.871), an increase in the V/C ratio of 0.046, during the Saturday mid-day peak hour

It should be noted that improvements to Intersection Nos. 13 (Nogales Street & San Jose Avenue) and 15 (Nogales Street & Gale Avenue/Walnut Drive) are currently being implemented as part of the Nogales Street Grade Separation Project. Following these improvements, intersection capacity will be adequate to accommodate Project trips and related projects without resulting in a significant delay, reducing Future (2020) With Project Plus Cumulative Traffic impacts to a less than significant level at these intersections. Potentially significant impacts would remain at the five other intersections identified above.

Although Intersection Nos. 4 and 18 would experience potentially significant degradation of service under Future (2020) With Project Plus Cumulative Conditions, both intersections currently operate at an acceptable LOS and are projected to continue to operate at an acceptable LOS with or without identified improvements.

(2) Congestion Management

Threshold TRAF-2: Would the Project conflict with an applicable congestion management program (CMP), including, but not limited to, level of service standards and travel demand measures, or other standards established by the CMP for designated roads or highways?

Impact Statement TRAF-2: *Implementation of the Project would not conflict with an applicable CMP including, but not limited to, level of service standards and travel demand measures, or other standards established by the CMP for designated roads or highways. The Project would not add ridership to nearby transit options that would significantly impact public transit service. This impact would be less than significant.*

The Los Angeles County CMP requires that a proposed development address two major subject areas with respect to traffic impacts: (1) the project's impacts on the CMP highway system and (2) the project's impacts on the local and regional transit systems. As noted above, Project traffic would not exceed the CMP thresholds.

Although not designated CMP monitoring locations, the Traffic Impact Analysis included a freeway off-ramp queuing analysis for Fullerton Road at the SR-60 westbound off-ramp, Fullerton Road at the SR-60 eastbound off-ramp, Nogales Street at SR-60 westbound off-ramp, and Nogales Street at SR-60 eastbound off-ramp. The freeway off-ramp vehicle queue is expected to adequately contain all vehicle trips associated with the Project and related projects within the existing vehicle stacking area (refer to Appendix G of the Traffic Impact Analysis). As a result, the Project would result in a less than significant impact to freeway off-ramps.

Another component of the CMP transportation impact analysis includes the review of transit impacts. Public transit within the Project vicinity is provided by Foothill Transit Routes 178, 289, 482, and 493 along Shadow Oak Drive, Nogales Street, La Puente Road, Valley Boulevard, SR-60, and Colima Road. As discussed under Existing Conditions above, Foothill Transit Routes 178 and 289 have bus stops on northbound and southbound Nogales Road, north of intersection with Gale Avenue/Walnut Drive, approximately 0.20 mile east of the Project Site. The number of anticipated transit trips to be generated by the Project is not expected to substantially impact transit service along these bus routes given their available capacity and the number of transit trips the Project would generate. In addition, Foothill Transit regularly reevaluates its transit routes as areas experience new development.

Metrolink, governed by SCRAA, provides commuter rail service between the Antelope Valley and downtown Los Angeles, and links Ventura, Los Angeles, San Bernardino, Riverside, Orange, and San Diego counties with transfer service between the bus and rail systems. The Metrolink station nearest the Project site is the Industry Station located approximately 2.7 miles northeast of the Project Site. The potential addition of rail passengers originating from the Project would have little or negligible impact of rail service along the Metrolink Riverside Route due to the limited number of riders the Project is anticipated to contribute.

The Project has been designed for pedestrian connectivity, which includes a landscaped sidewalk along Gale Avenue, interconnected and landscaped pedestrian walkways through the Project Site and to the Rowland Heights Plaza Shopping Center, and an ADA ramp from Gale Avenue. Pedestrian areas, including plazas and

walkways, would be well lighted for security. Additionally, the Project would not conflict with the Metro Bicycle Transportation Strategic Plan, which seeks to make cycling a viable travel choice by promoting links between bicycle facilities and the transit network, since it provides bicycle facilities on the Project Site in compliance with the LACC and would not result in the removal or modification of existing bicycle network facilities. As such, impacts to CMP facilities would be less than significant.

Based on the trip generation figures cited above for the Project, the Project's traffic would not impact transit or pedestrian facilities. As such, impacts to CMP facilities would be less than significant.

(3) Traffic Hazards

Threshold TRAF-3: Would the Project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Statement TRAF-3: *Implementation of the Project would not substantially increase hazards due to a design feature or incompatible use. This impact would be less than significant.*

No existing hazardous design features such as sharp curves or dangerous intersections exist on site or in the Project vicinity. Vehicular access to the Project Site would be provided directly from Gale Avenue via an ingress/egress driveway on the proposed parcel boundary between Parcel 1 and Parcels 2 and 3, which would serve as the primary Project Site entrance, and a new ingress/egress driveway into Parcels 2 and 3 along the western Project Site boundary. A new driveway would also provide access to Parcel 1 from the existing shared driveway with the Rowland Heights Plaza Shopping Center to the east. The ACE Nogales Street Grade Separation Project will also widen Gale Avenue by between 16 and 18 feet (i.e., eight to nine feet on each side) to create a four-lane road for a distance of 0.36 miles west of its intersection with Nogales Street, including the Project Site frontage. Gale Avenue's eastbound approach to Nogales Street would be reconfigured to accommodate two exclusive left-turn lanes, one through-lane, and one exclusive right-turn lane. On-site traffic signage and striping would be incorporated into the detailed construction plans for the Project.

The Traffic Impact Analysis noted that Project access and circulation would be reviewed by the LACDPW Traffic and Lighting with respect to Caltrans/Los Angeles County standards to ensure that the Project does not substantially increase hazards due to a design feature. The County of Los Angeles would also periodically review traffic operations in the Project vicinity once the Project is constructed to ensure that traffic operations are satisfactory. Impacts would be less than significant.

(4) Emergency Access

Threshold TRAF-4: Would the Project result in inadequate emergency access?

Impact Statement TRAF-4: *Project construction would result in a less than significant impact related to inadequate emergency access with implementation of Project Design Feature PDF-TRAF-1.*

As discussed in Subsection d.(1)(a), Project Construction, although Project construction would be ongoing for a minimum of 24 months, with implementation of Project Design Feature PDF-TRAF-1, construction-

related activities and traffic would result in a less than significant impact on pedestrian routes and transportation safety in the Project vicinity. Project Design Feature PDF-TRAF-1 would also ensure that construction activity and traffic would not significantly impact emergency access in the Project vicinity.

With respect to Project operation, regional access to the Project Site is provided via SR-60, located 75 to 350 feet south. Local access to the Project Site would be provided by three ungated access driveways on Gale Avenue. Per the Los Angeles County, Code of Ordinances, Title 21, Subdivisions, Chapter 21.24, Design Standards, Part 1, Access, Section 21.24.010, General Requirements, the County has reviewed the Project design plans to ensure the deployment of fire equipment or other services under emergency conditions, among other access provisions, would be adequate for the Project. The Project site has been designed to provide access to fire, ambulatory, and Sheriff vehicles from adjacent roadways. Clear and uninterrupted access into the site for emergency response vehicles would be served from Gale Avenue. The Project's access drives and internal private drives have been designed to meet the County and County of Los Angeles Fire Department (LACFD) standards. All Project Site access and circulation has been reviewed by the LACDPW and LACFD to ensure that the Project provides adequate emergency access.

(5) Plan and Policy Consistency

Threshold TRAF-5: Would the Project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or parking supply, otherwise decrease the performance or safety of such facilities?

Impact Statement TRAF-5: *Implementation of the Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or the proposed vehicular or bicycle parking supply, otherwise decrease the performance or safety of such facilities. These impacts would be less than significant.*

(a) Transit

The Project consists of a commercial development that would not conflict with adopted policies, plans, or programs supporting alternative transportation. The Project does not propose to alter any existing bus turnouts or established alternative transportation programs within the County. Enhanced pedestrian access, including ramps, crosswalks, decorative paving, and other amenities between Gale Avenue and the Project Site, Rowland Heights Plaza Shopping Center to the east and the Project Site, and between the commercial and hotel uses proposed on the parcels within the Project Site, would be provided. Based on the above, Project impacts with respect to compliance with the County plans and policies would be less than significant.

(b) Parking

As discussed above, the adequacy of on-site parking was evaluated in a Parking Assessment prepared for the Project by Linscott Law & Greenspan in May 2015, based on the requirements of the County Parking Code and procedures outlined by the ULI. As discussed in Chapter 2.0, Project Description, of this Draft EIR and detailed in **Table 4.K-8, Project Parking Summary**, below, the Project would provide 1,161 parking spaces.

As shown in **Table 4.K-9, County Parking Code Requirements**, when the proposed uses are considered individually, the County Parking Code requires 1,503 parking spaces. However, this represents a

Table 4.K-8

Project Parking Summary

Proposed Use	Parking Spaces
Commercial Parcel (Parcel 1)	689 spaces
Full-Service Hotel A Parcel (Parcel 2)	260 spaces
Extended-Stay Hotel B Parcel (Parcel 3)	137 spaces
Parking Subtotal	1,086 spaces
Northern Parcel	75 spaces
Parking Total	1,161 spaces

Source: Parallax Investment Corp., Architects Orange, Gene Fong Associates, June 2015.

conservative calculation because, as previously stated, peak parking demand for each of the proposed uses would not occur simultaneously, and the Project as a whole would benefit from the variations in parking demand that occur throughout the day, as well as during the week, allowing the sharing of parking spaces between uses. Shared parking requirements are based on ULI parking ratios for weekdays and weekends for each of the individual uses. Based on these parking ratios, the Parking Assessment that the weekday peak parking demand is forecast to occur at 6:00 P.M., when 1,138 spaces would be required. Similarly, the Parking Assessment found that the weekend peak parking demand is forecast to occur on Saturday at 8:00 P.M., when 1,143 parking spaces would be needed. As a result, the Project, the proposed on-site parking supply of 1,161 parking spaces would adequately accommodate the peak parking demand of the Project for both a weekday and Saturday condition, with a surplus of 23 and 18 parking spaces, respectively. This forecast demand is highly conservative (worst case), as it assumes 100 percent utilization of the Project's hotel banquet floor area and Commercial Center restaurants during the evening hours on weekdays and Saturdays. It is rare, for example, that all function space within a hotel is used simultaneously. Also, some restaurants may focus to a dinner service while other food-serving tenants (e.g., many quick-serve-type restaurants) have their peak activity during the lunch period.⁵ Therefore, it is likely that the parking demand would be substantially less (and the resultant surpluses of unused parking spaces higher) than the "worst case" forecast provided.

The development of the Project may be phased such that individual components could be constructed separately. **Table 4.K-10, Parking Demand for Project Phasing Scenarios**, outlines four likely phasing scenarios and the parking demand associated with each scenario. Table 4.K-10 also provides the forecast peak hour parking demand from the Parking Assessment and provides a comparison to the proposed parking supply associated with each phase. As shown, the Project would provide a parking surplus during each of the phasing scenarios. Therefore, the Project's provision of parking spaces in each of the phasing scenarios would exceed the calculated peak parking demand, and Project parking would adequately accommodate the proposed uses. Moreover, PDF-TRAF-3 is intended to ensure adequate parking is provided for restaurant uses in Parcel 1, the commercial center, as they are leased and facilities designed. With implementation of the Shared Parking Study and PDF-TRAF-3, the proposed Project supply would

⁵ The Parking Assessment conservatively assumes all of the restaurant space would experience peak activity during the dinner period (e.g., using the Fine/Casual Dining hourly parking profiles).

Table 4.K-9

County Parking Code Requirements

Land Use	Quantity	Code Parking Rate	Required Parking
<u>Hotel A</u>			
Rooms	261 rms	0.5 /rm	131
Suites	14 suites	1.0 /suite	14
Banquet Room	10,000 sf	1.0 /3 occupants ^a	222
Meeting Room	2,000 sf	1.0 /3 occupants ^a	44
Restaurant	6,000 sf		
Customer Area	4,200 sf	1.0 /3 occupants ^a	93
Kitchen Area	1,800 sf	1 /3 occupants ^a	<u>3</u>
Subtotal Hotel A			507
<u>Hotel B</u>			
Rooms	132 rms	0.5 /room	66
Suites	70 suites	1.0 /suite	<u>70</u>
Subtotal Hotel B			136
<u>Commercial Center</u>			
Restaurant	40,113 sf	1 /3 occupants ^b	
Customer Area ^c	22,062 sf	1 /3 occupants ^b	490
Kitchen Area ^c	18,051 sf	1 /3 occupants ^b	30
Retail	63,707 sf	4 /1,000 sf	255
Medical Office or Retail	20,000 sf	4 /1,000 sf	80
General Office	2,000 sf	2.5 /1,000 sf	<u>5</u>
Subtotal Commercial Center			860
Total			1,503
Project Parking			1,161
Surplus			342

^a Meeting and Banquet Room parking rate assumes 1 occupant per 15 square feet.
^b Restaurant parking rate assumes 1 occupant per 15 square feet of customer area or 1 occupant per 200 square feet of kitchen area.
^c Restaurant floor area in Commercial Center assumed to average 55 percent customer area and 45 percent kitchen on an aggregate basis.

Source: Linscott Law & Greenspan, May 2015.

exceed the number of parking spaces necessary to serve Project uses and would result in a less than significant parking impact.

Table 4.K-10

**Parking Demand
For Project Phasing Scenarios**

Project Phasing Scenario	Parking Supply	Peak Parking Demand (time of day/week)	Parking Surplus
Hotel A Only	330 spaces ^a	327 spaces (8:00 p.m. weekday)	3 spaces
Hotel A & B	445 spaces ^b	442 spaces (9:00 p.m. weekday)	3 spaces
Commercial Center Only	810 spaces ^c	789 spaces (12:00 p.m. Saturday)	21 spaces
Hotel A & Commercial Center	1,075 spaces ^d	1,057 spaces (12:00 p.m. Saturday)	18 spaces

^a For the Hotel A scenario, 260 parking spaces would be provided on Parcel 2 (Hotel A) and 70 temporary parking spaces on Parcel 3 (Hotel B).

^b For the Hotel A & B scenario, 417 spaces would be provided on combined Parcels 2 and 3 (Hotels A & B) (inclusive of the 20 spaces on the City of Industry parcel), and 28 temporary parking spaces provided on Parcel 1 (Commercial Center).

^c For the Commercial Center only scenario, 746 parking spaces would be provided on Parcel 1 (inclusive of the 55 spaces on the City of Industry parcel) and 66 temporary parking spaces provided on either Parcel 2 (Hotel A) or Parcel 3 (Hotel B).

^d For the Hotel A & Commercial Center scenario, 1,004 parking spaces would be provided on Parcel 2 (Hotel A) and Parcel 1 (the Commercial Center) (inclusive of the 55 spaces on the City of Industry parcel) and 71 temporary parking spaces on Parcel 3 (Hotel B).

Source: Parallax Investment Corp., Architects Orange, Gene Fong Associates, June 2015.

4. MITIGATION MEASURES

With implementation of Project Design Feature PDF-TRAF-1, impacts related to construction traffic would be less than significant.

Mitigation Measure MM-TRAF-1, below, identifies the Project Applicant's fair-share contributions toward the physical mitigation measures required to reduce impacts at two of the potentially significantly impacted intersections to a less than significant level:

MM-TRAF-1: The Project Applicant shall pay a fair-share contribution to LACDPW or the City of Industry, as appropriate, to implement the following physical improvements identified at two intersections that would be significantly impacted by the Project under Future (2020) With Project Plus Cumulative Traffic conditions:

- **Intersection No. 1 (Fullerton Road & Gale Avenue):** The Project Applicant shall coordinate with the City of Industry to arrange a fair-share contribution towards the construction of an additional westbound left-turn lane at this intersection. The fair-share contribution shall be made in accordance with Table 8, Project Fair Share Contributions, of the approved Rowland Heights Plaza Traffic Impact Analysis, which requires the Project Applicant to contribute 97.9 percent of the estimated City of Industry cost to implement this improvement.

- **Intersection No. 3 (Fullerton Road & SR-60 Freeway Eastbound Ramps):** The Project Applicant shall coordinate with LACDPW to arrange a fair-share contribution towards the construction of a northbound through travel lane at this intersection. The fair-share contribution shall be made in accordance with Table 8, Project Fair Share Contributions, of the approved Rowland Heights Plaza Traffic Impact Analysis, which requires the Project Applicant to contribute 81.1 percent of the estimated LACDPW cost to implement this improvement.

The remaining three significantly impacted intersections are already fully built out (with the exception of Intersection No. 4, Fullerton Road & Colima Road, where a funded highway improvement project that would add a northbound exclusive right-turn lane to Fullerton Road is currently being administered by LACDPW) and no additional physical improvements are feasible at these locations. Impacts at these three intersections, therefore, cannot be mitigated to a less than significant level.

- **Intersection No. 4 (Fullerton Road & Colima Road)**
- **Intersection No. 10 (Nogales Street & La Puente Road)**
- **Intersection No. 18 (Nogales Street & Colima Road)**

As previously stated, these intersections currently operate at an acceptable LOS and are projected to continue to operate at an acceptable LOS with or without identified improvements.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project was determined to result in potentially significant traffic impacts at five signalized intersections under Future (2020) With Project Plus Cumulative Traffic conditions, prior to mitigation. Mitigation Measure MM-TRAF-1, which defines specific physical improvements at two of the affected intersections (Nos. 1 and 3) and the Project's anticipated fair-share contribution to the cost of these improvements, would reduce the Project's impacts at these intersections to a less than significant level, as shown in Table 4.K-7. Project impacts at the remaining three intersections (Nos. 4, 10, and 18) would remain significant and unavoidable due to the projected change in V/C. The LOSs at these intersections would continue to be acceptable per County standards.

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4.L UTILITIES

4.L.1 WASTEWATER

1. INTRODUCTION

This section describes the existing and proposed wastewater collection and treatment facilities in the Project area, and evaluates whether these facilities have sufficient conveyance and treatment capacity to serve the Project. This section is based, in part, on a *Sewer Capacity Study for Hotel/Retail Site on Gale Ave.* (Sewer Capacity Study)¹, provided in Appendix J-1 of this Draft EIR, and the will-serve letter from the Los Angeles County Sanitation Districts (LACSD),² provided in Appendix D of Appendix J-1.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Wastewater Collection

Wastewater collection from the Project site and the surrounding area is provided by the LACSD, whose purpose is to construct, operate, and maintain facilities that collect, treat, recycle, and dispose of domestic and industrial wastewater. This includes wastewater both from the unincorporated Rowland Heights area and from the City of Industry (under contract with the Los Angeles County Consolidated Sewer Maintenance District, or LACCSMD).³

The Rowland Heights area and City of Industry are served by a regional, interconnected system of wastewater collection and treatment facilities known as the Joint Outfall System (JOS). The JOS includes a network of local sewer lines and trunk sewer mains, upstream water reclamation plants (WRPs) for recycled water, and a downstream joint water pollution control plant (JWPCP) that treats wastewater with a higher industrial contribution and the solids that are removed at the upstream plants.⁴ See the discussion below under Wastewater Treatment for a discussion of the applicable upstream WRP.

As indicated in Exhibit 2 of the Sewer Capacity Study, the upstream end of the sewage tributary area in which the Project Site is located begins with an eight-inch vitrified clay pipe (VCP) just north of the intersection of Colima Road and Nogales Street and continues north to an eight-inch VCP just south of the Pomona Freeway (SR-60). The eight-inch VCP continues north, crossing SR-60 to the intersection of Gale Avenue and Nogales Street. From there, the pipe up-sizes to a 10-inch VCP and continues north to the southerly right of way of the Metrolink Railway, and then turns to the west and continues for approximately 1,300 feet within the railway right-of-way where it up-sizes to a 12-inch VCP before heading west to the northwest corner of the Project Site. At this point, the 12-inch VCP, operated by LACCSMD, turns north and crosses the Metrolink

¹ *Thienes, Engineering, Inc., Sewer Capacity Study for the Hotel/Retail Site on Gale Ave., Rowland Heights, LA County, CA, March 2014, Revised August 24, 2015.*

² *Adriana Raza, Customer Services Specialist, Facilities Planning Department, County Sanitation Districts of Los Angeles County, letter dated March 3, 2015.*

³ *Los Angeles County Department of Regional Planning, The Canyon Residences Project Draft EIR, Project No. R2008-00549, SCH No. 2008061035, , September 2010, page 5.81. Also, City of Industry, General Plan Update Draft EIR, SCH No. 2011031090, February 2014, pages 5.14-16 and -19.*

⁴ *City of Industry, General Plan Update Draft EIR, op. cit., pages 5.14-1-19.*

Railway where it changes to a 12-inch cast iron pipe operated by LACCSMD before continuing northward and connecting to a 30-inch outfall trunk sewer (Joint Outfall H Unit 7C Trunk Sewer) operated by Sanitation District No. 21.⁵

The two off-site sewer lines immediately downstream of the Project Site include the 12-inch VCP at the northwest corner of the Project site and the 30-inch outfall trunk sewer. The on-site wastewater collection system is currently connected to a 10-inch sewer line within the driveway shared with the Rowland Heights Plaza Shopping Center to the east, which discharges into the westward-flowing 10-inch and 12-inch VCPs within the Metrolink Railway right-of-way. Except for some temporary parking associated with the Rowland Heights Plaza Shopping Center, the Project Site is vacant and does not currently generate sewage.

(2) Wastewater Treatment

The Project site and its environs are located within the wastewater treatment service area of the San Jose Creek WRP.⁶ The San Jose Creek WRP, located along the western boundary of the City of Industry, is the largest of the upstream WRPs in the JOS, with a treatment capacity of 100 million gallons per day (mgd) and currently treats an average daily flow of 73.1 mgd.⁷ It provides primary, secondary, and tertiary treatment that yields at least 35 mgd of purified (recycled) water, some of which is available for use within the local area.⁸ Wastewater biosolids from the San Jose Creek WRP are treated at the Joint Water Pollution Control Plant located in the City of Carson.⁹

b. Regulatory Framework Summary

Following is a discussion of the regulatory plans, regulations, and requirements related to wastewater collection and treatment applicable at the Project Site.

(1) Federal

(a) Clean Water Act

The Clean Water Act (CWA) is a 1977 amendment to the Federal Water Pollution Control Act of 1972. The CWA is the principle federal statute governing water quality. It establishes the basic structure for regulating discharges of pollutants in to the waters of the United States and gives the U.S. Environmental Protection Agency (USEPA) the authority to implement pollution control programs, such as setting wastewater standards for industry.¹⁰

The CWA was enacted with the primary purpose of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters. The CWA directs states to establish water quality standards for waters of the United States, and to review and update these standards on a triennial basis. The CWA also

⁵ *Thienes, Engineering, Inc., Sewer Capacity Study for the Hotel/Retail Site on Gale Ave., op. cit.*

⁶ *Ibid.*

⁷ *Ibid.*

⁸ *City of Industry, General Plan Update Draft EIR, op. cit., page 5.4-19.*

⁹ *Grace Robinson Hyde, County Sanitation Districts of L.A. County, comment letter on the Rowland Heights Plaza and Hotel Project NOP, July 7, 2015 and included in Appendix A-4 of this Draft EIR.*

¹⁰ *City of Industry, General Plan Update Draft EIR, op. cit., page 5.4-19.*

established the National Pollutant Discharge Elimination System (NPDES) which regulates discharges to waters of the United States to help achieve the standards (see discussion below).¹¹

(b) National Pollutant Discharge Elimination System

Under the NPDES program promulgated under Section 402 of the CWA, all facilities that discharge pollutants from any point source into waters of the United States are required to obtain an NPDES permit. The term pollutant broadly includes any type of industrial, municipal, and agricultural waste discharged into water. Point sources are discharges from publicly owned treatment works, industrial facilities, and urban runoff.¹²

NPDES permits limit the types and quantities of pollutants in discharges. The USEPA has delegated the responsibility for administering the NPDES program in California to the State Water Resources Control Board (SWRCB) and to local Regional Water Quality Control Boards (RWQCBs). This includes the Los Angeles Regional Water Quality Control Board (LARWQCB), which administers the program in Los Angeles County through the issuance and enforcement of local NPDES permits designed to comply with the water quality standards for each receiving water set forth in the local Basin Plan.¹³

(2) Regional

(a) NPDES Permit (Order No. 94-021)

The San Jose Creek WRP is subject to NPDES Permit (Order No. 94-021) issued by the LARWQCB. The permit regulates the discharge of treated wastewater from the WRP into Santa Monica Bay (the applicable receiving water) by setting limitations on the types and amounts of pollutants in discharges from the plant.¹⁴

(3) County

(a) Los Angeles County Code, Section 20.32

Chapter 20.32 of the Los Angeles County Code (LACC) addresses wastewater systems, including sewer construction and connection permits, fees and deposits, design standards, maintenance, and inspections. As stated in Section 20.32, no permit shall be issued for the direct connection of any lot to a trunk sewer until the applicant has first obtained a permit. Before granting any such permit, the County engineer shall collect all applicable sewer construction permit fees, connection charges, and plan checking fees from the applicant. Additionally, each proposed sewer line and any connections to the County sewer system, shall be designed in accordance with the guidelines set forth in Section 20.32, including applicable sizing and capacity requirements.¹⁵

¹¹ Los Angeles County Department of Regional Planning, *Draft EIR for LA Plaza Cultura Village, Project No. R2014-00619, SCH No. 2014031061, July 2014, page 4.14-4.*

¹² *City of Industry General Plan Update Draft EIR, op. cit., page 5.4-19.*

¹³ Los Angeles County Department of Regional Planning, *Draft EIR LA Plaza Cultura Village, op. cit., page 4.14-4.*

¹⁴ Los Angeles County Department of Regional Planning, *Draft EIR Canyon Residences Project, op. cit., page 5.8-10.*

¹⁵ *Ibid., page 5.8-9.*

(4) City¹⁶

The City of Industry contracts the operation and maintenance of its wastewater collection system to the LACCSMD, which operates the system under County requirements. Nonetheless, because a portion of the Project Site is located in the City of Industry, City wastewater requirements apply.

(a) City of Industry Municipal Code

- **Title 13 (Water and Sewers), Chapter 13.17 (SUSMP Implementation).** Incorporates by reference and adopts many of the provisions outlined in Los Angeles RWQCB's Standard Urban Stormwater Mitigation Plan (SUSMP). Provisions include limitations on the rate of discharge; subdivision design standards; and guidance and standards for the design, implementation and maintenance of BMPs.
- **Title 16 (Subdivisions), Chapter 16.42 (Drainage/Sewer Facilities), §16.42.010 (Payment of Required Fees).** Prior to filing a final or parcel map, the subdivider shall pay or cause to be paid any fees for defraying the actual or estimated costs of planned or required sanitary sewer facilities.

(b) City of Industry General Plan Update - Resource Management Element

- **Policy RM-4.** Require the control and management of urban runoff consistent with RWQCB and Los Angeles County MS4 Permit regulations.
- **Policy RM1-8.** Require the management of wastewater discharge and collection consistent with requirements adopted by the RWQCB.

3. ENVIRONMENTAL IMPACTS**a. Methodology****(1) Wastewater Collection**

The sewer capacity analysis estimates Project sewage generation and evaluates whether the existing 12-inch existing sewer line at the northwest corner of the Project Site has adequate remaining capacity to convey Project sewage to the Sanitation District 21 30-inch trunk sewer to the north. The analysis was conducted quantitatively using the Los Angeles County Department of Public Works (LACDPW) Sewer Manual S-C4 chart for a maximum design capacity at half full for sewer lines less than 15 inches in diameter and three-quarters full for sewer lines 15 inches and greater in diameter. The existing cumulative calculated flow for each segment from the sewage tributary area in which the Project site is located was compared to the sewer capacity at each segment both with and without the Project. This tributary area and parcel-by-parcel Los Angeles County zoning designations within this tributary area are shown in Exhibit 2 of the Sewer Capacity Study. The corresponding LACDPW sewage flow coefficients by zone are identified in Appendix B of the Sewer Capacity Study, and the resulting tributary sewage area calculations are included in Appendix A, Table 1 of the Sewer Capacity Study. Since the Project Site is located at the very downstream end of the sewage tributary area, the capacity analysis is restricted to an analysis of the impacts of the Project on the capacity of the 12-inch sewer line mentioned above.¹⁷

¹⁶ *City of Industry, General Plan Update Draft EIR, op. cit., page 5.4-21.*

¹⁷ *Thienes, Engineering, Inc., Sewer Capacity Study for the Hotel/Retail Site on Gale Ave, op. cit.*

According to LACDPW design criteria, sewer lines are considered to be operating at 100 percent of capacity if they are 50 percent full, although the allowable flow for the sewer segments is up to 150 percent of capacity.¹⁸

(2) Wastewater Treatment

The wastewater treatment capacity analysis was conducted quantitatively by identifying the projected sewage generated associated with the Project and comparing this sewage generate to the existing remaining unused capacity of the San Jose Creek WRP.

b. Thresholds of Significance

The potential for impacts related to wastewater disposal, collection, and treatment is based on thresholds derived from the County's Initial Study Checklist questions, which are based, in part, on Appendix G of the State CEQA Guidelines. These questions are as follows:

18. Utilities and Service Systems. Would the project:

- a) Exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Boards?
- b) Create water or wastewater system capacity problems, or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The Initial Study determined that the Project would have a less than significant impact with respect to a) Exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board. Accordingly, this environmental topic is not evaluated in this EIR.

Based on these factors, the Project would have a potentially significant wastewater impact if it would:

WW-1: Create wastewater collection system capacity problems or require new or expanded wastewater collection or treatment facilities, the construction of which would cause significant environmental effects.

c. Project Characteristics or Design Features

As indicated in the second figure in Appendix D of the Sewer Capacity Report, provided in Appendix J-1 of this Draft EIR, an on-site wastewater collection system is proposed that would convey sewage from the proposed development to the existing LACCSMD 12-inch off-site sewer line located at the northwest corner of the Project Site (at Manhole #281 – see Exhibit 2 in the Sewer Capacity Study). Design features proposed to reduce Project wastewater generation and the wastewater impacts of the Project include the use of low-flow toilets.

¹⁸ *Ibid.*

d. Project Impacts

Threshold WW-1: A significant wastewater impact would occur if the Project would create wastewater collection system capacity problems or require new or expanded wastewater collection or treatment facilities, the construction of which would cause significant environmental effects.

Impact Statement WW-1: *Construction and operation of the proposed on-site wastewater collection system would not cause significant environmental impacts, and the existing downstream wastewater collection system has adequate capacity to accommodate wastewater generated by the Project. No new or expanded off-site wastewater collection or treatment facilities are required. Impacts would be less than significant.*

(1) Project Construction

Construction of the Project would involve removal of existing asphalt paving, excavation of the site for below-grade substructures and foundations, trenching for utilities, and construction of new buildings, parking areas, on-site roadways, and related improvements (including a new on-site wastewater collection system) over an approximately three-year period.

Project grading activities would not disrupt sewer services for adjacent uses, as the only existing on-site sewer line serving other uses (the 10- to 12-inch VCP located in the northernmost portion of the Project Site) would be preserved in place. Furthermore, no deep excavations are proposed in the area of this existing sewer line, so substantial potential to damage this sewer line would not occur during Project construction. Also, construction workers would utilize private portable on-site sanitation facilities that would be serviced by a private company licensed to handle and properly dispose of the associated waste. In addition, the environmental effects associated with Project construction, including construction of the proposed on-site sewer system, are evaluated throughout this Draft EIR, and for those environmental issues where excavation activities for the on-site sewer system could potentially result in impacts (e.g., archaeological and paleontological resources, air quality, etc.), impacts would be less than significant after mitigation. Finally, the Project would not require the construction of new or expanded wastewater treatment facilities. Thus, impacts would be less than significant.

(2) Project Operation

(a) Wastewater Collection

According to the Sewer Capacity Report in Appendix J-1 of this Draft EIR, the Project would generate an estimated total average sewage flow rate of 0.1998 cubic feet per second (cfs), (which translates to a daily average flow of 129,153 gallons per day [gpd]), and a total peak sewage flow of 0.4996 cfs). According to the capacity analysis in the Sewer Capacity Study, the LACCSMD's 12-inch sewer line from the northwest corner of the Project Site to the 30-inch Sanitation District trunk sewer (as calculated at Manhole 281) would operate at above 50 percent full (specifically, 125.1 percent of capacity) under existing plus Project conditions. However, because LACDPW design criteria permit sewer lines to operate at 150 percent of capacity, the downstream wastewater collection system has adequate capacity to accommodate the sewage to be generated by the Project. Furthermore, the Project Applicant would pay the required sewer connection fees to help defray Sanitation District costs for providing sewer conveyance for the proposed Project. Finally, LACSD has issued a will-serve letter for the Project, and the City of Industry has submitted a letter to

the Project's civil engineer indicating that no sewer mitigation is required for the Project (both these letters are included in Appendix D of the Sewer Capacity Study). Therefore, the wastewater conveyance impacts of the Project would be less than significant.

(b) Wastewater Treatment

Wastewater generated by the Project would be treated at the San Jose Creek WRP. As indicated, the WRP has an existing treatment capacity of 100 mgd and currently treats an average daily flow of 73.1 mgd.¹⁹ Based on these numbers, the San Jose Creek WRP has a remaining unused treatment capacity of approximately 26.9 mgd. According to Table 1 in Appendix A of the Sewer Capacity Report, provided in Appendix J-1 of this Draft EIR, peak Project sewage generation would be an estimated 0.4996 cubic feet per second, or an average of 89.69 gallons per minute (gpm) or 0.108 mgd. This would represent a negligible proportion (approximately 0.4 percent) of the remaining unused treatment capacity of the San Jose Creek WRP. Furthermore, as discussed in Initial Study (included as Appendix A-2 of this Draft EIR), the Project would be consistent with regional growth forecasts, and as the capacity of County wastewater treatment facilities is based on these forecasts, wastewater from the proposed Project has been assumed in County wastewater treatment capacity planning. Finally, the Project Applicant would pay the required sewer connection fees to help defray Sanitation District capital facilities costs for provision of sewage treatment for the Project. Therefore, the San Jose Creek WRP has adequate treatment capacity to serve the Project, and impact would be less than significant.

e. Cumulative Impacts

(1) Wastewater Collection

According to Table 1 in Appendix A of the Sewage Capacity Study, the cumulative + Project sewage generation within the sewage tributary area of the Project would be 2.2945 cfs in the LACCSMD 12-inch VCP immediately downstream of the Project Site (at Manhole 281) which would represent 125.1 percent of the capacity of the 12-inch VCP. Because this would be below LACDPW's design criteria, which permits sewer lines to operate at 150 percent of capacity, the Project would have a less than significant cumulative impact on wastewater collection and conveyance.

(2) Wastewater Treatment

Wastewater generated by the Project and the related projects would be conveyed to the San Jose Creek WRP for treatment. As discussed, the San Jose Creek WRP is currently operating at 26.9 mgd below its capacity. The addition of the wastewater projected to be generated by the Project, in combination with cumulative development, would not exceed the remaining treatment capacity of the plant. Additionally, as with the Project, other new development in the sewage tributary area would be required to pay the connection fee upon connection to the sewer system, which contributes to maintenance and any necessary expansion of LACDPW's wastewater treatment system. Therefore, cumulative wastewater treatment impacts would be less than significant.

4. MITIGATION MEASURES

No mitigation measures are required.

¹⁹ *Thienes, Engineering, Inc., Sewer Capacity Study for the Hotel/Retail Site on Gale Ave., op. cit.*

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The wastewater collection and treatment impacts of the Project would be less than significant. Therefore, no mitigation measures are required, and no significant unavoidable adverse wastewater impacts would occur.

4.L UTILITIES

4.L.2 WATER SUPPLY

1. INTRODUCTION

This section identifies the water purveyor responsible for providing water to the Project, and analyzes whether this water purveyor has adequate water supplies to serve the proposed Project. This section also describes the existing and proposed water distribution infrastructure in the Project area, and evaluates whether this infrastructure has sufficient capacity to serve the proposed Project. This section is based on several information sources, including but not limited to a will-serve letter¹ and a letter determining that no Water Supply Assessment (WSA) is required for the Project² from the Rowland Water District (RWD), together provided as Appendix J-2, Water Supply Availability Supporting Information, of this Draft EIR, and the RWD's 2010 Urban Water Management Plan (UWMP). The latter is available on the California Department of Water Resources website.³

2. ENVIRONMENTAL SETTING

a. Existing Conditions

The Project Site is currently vacant, except for some temporary surface parking associated with the Rowland Heights Plaza Shopping Center, and does not generate a demand for water at present.

(1) Water Supply⁴

(a) Water Supply and Demand

As indicated in **Figure 4.L.2-1, Rowland Water District Service Area**, the Project Site is located within the 17.5-square-mile service area of the RWD, which is responsible for providing water to the Project Site and the surrounding area (including portions of the unincorporated communities of Rowland Heights and Hacienda Heights, the city of La Puente, and portions of the cities of Industry and West Covina). RWD's service area has a Mediterranean climate with hot, dry summers, cool mild winters and an average annual rainfall of approximately 18 inches, with most rainfall occurring between October and April.

RWD obtains its potable water from the Metropolitan Water District (MWD) through the Three Valleys Water District (MWD's local wholesale supplier), which MWD imports via the California and Colorado River Aqueducts. Because the underlying groundwater basin (Puente Basin) is contaminated, basin groundwater does not currently serve as a potable water supply for RWD. RWD's potable water is treated by MWD at its Weymouth Treatment Plant (WTP) in La Verne, which treats up to 520 million gallons per day (mgd), and by Three Valleys (for MWD) at its Miramar WTP in Claremont, which has a capacity of 25 mgd. RWD provides an average of 18 mgd of potable water to its customers during summer and 10 mgd during winter.

¹ Tom Coleman, General Manager, Rowland Water District, letter dated September 2, 2015.

² Dave Warren, Director of Operations, Rowland Water District, email dated October 7, 2015.

³ Rowland Water District, 2010 Urban Water Management Plan, adopted July 2011, <http://www.water.ca.gov/urbanwatermanagement/2010uwmps/Rowland%20Water%20District/Rowland2010%20UWMP.pdf>.

⁴ Rowland Water District, 2010 Urban Water Management Plan, *op. cit.*, pages 2-1 through 4-1.

Nonpotable water is obtained by RWD primarily from the Los Angeles County Sanitation District's (LACSD) San Jose Creek Wastewater Reclamation Plant (WRP) as treated wastewater which is pumped to RWD's recycled water system. This is supplemented with nonpotable groundwater from the Puente Basin and emergency recycled water from the Walnut Valley Water District.

RWD has 17 potable water storage reservoirs with a total capacity of 48 million gallons to serve an existing average customer water demand of approximately 14 mgd. RWD also has one recycled water reservoir with a total capacity of five million gallons.

Table 4.L.2-1, Past and Current RWD Service Population, Water Demand and Water Supply, summarizes the past and current service population, water demand, and water supply in the RWD service area, as identified in the RWD 2010 Urban Water Management Plan (UWMP). As indicated, the current (2015) service population is 70,005 residents, the current water demand is 15,727 acre-feet per year (AFY), and the current water supply is 17,000 AFY, with approximately two-thirds of both the current demand and supply coming from potable water and the remaining one-third from nonpotable water (recycled water and groundwater). As indicated in the UWMP, past and current water supply was either at or above demand. Although the number of water connections in the RWD has increased in recent years, per capita water demand has decreased as a result of mandatory water reductions and the water conservation measures currently being implemented within the RWD (both discussed below).

Table 4.L.2-1

Past and Current RWD Service Population, Water Demand and Water Supply

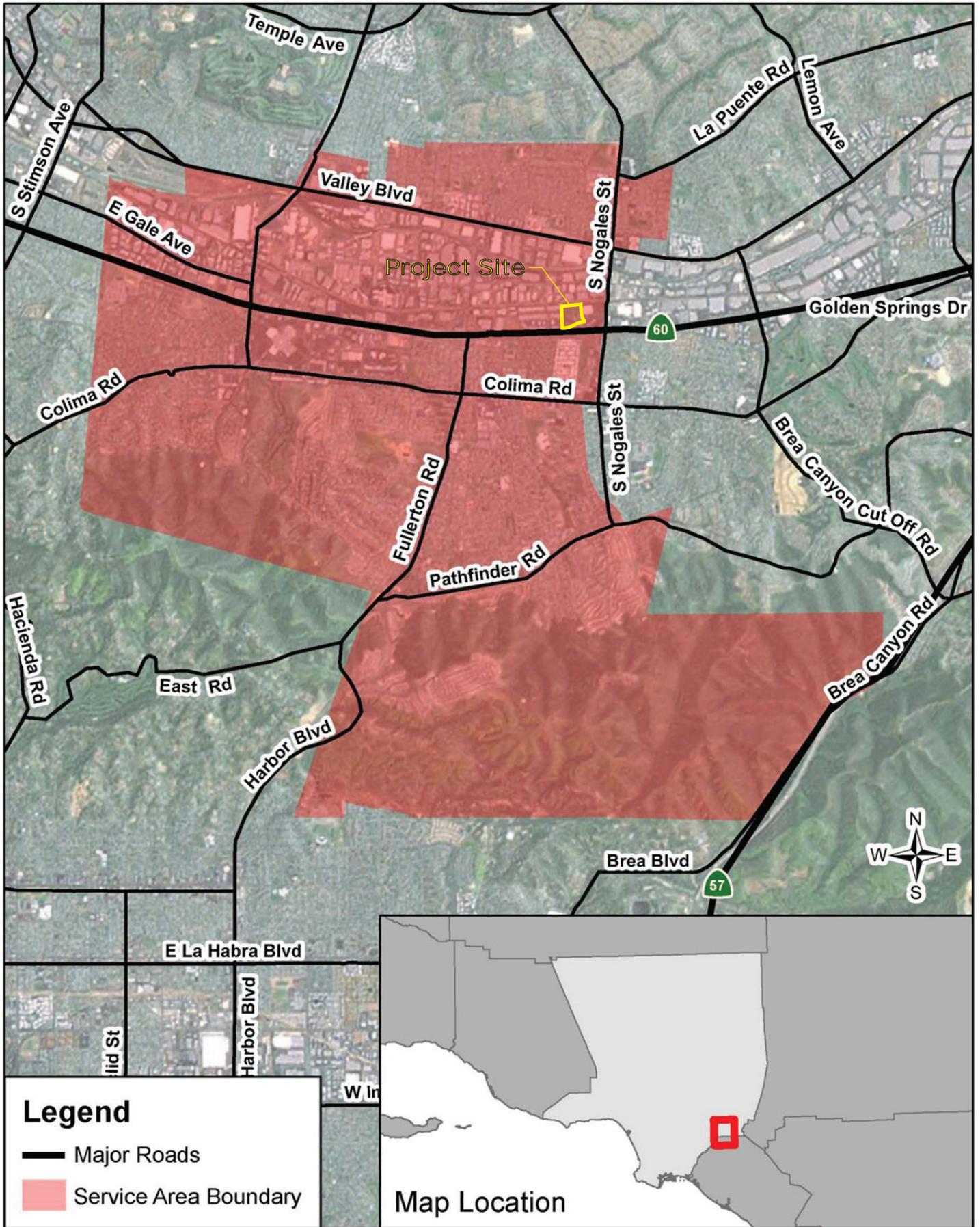
Service Population		
Service Population	2010	2015
Service Area Population	62,106	70,005
Water Demand (AFY)		
Water Demand Source	2010^a	2015^b
Potable Water	10,990	12,727
Nonpotable Water	523	3,000
Total	11,513	15,727
Water Supply (AFY)		
Water Supply Source	2010	2015
Potable Water	10,990	12,800
Nonpotable Water	523	4,200
Total	11,513	17,000

AFY = acre-feet per year.

^a Based on actual water used.

^b Based on a projection using a per capita water use factor tied to service population.

Source: Rowland Water District, 2010 Urban Water Management Plan, Tables 2-3, 3-11, and 4-1, adopted July 2011.



Rowland Water District Service Area

Rowland Heights Plaza and Hotel Project
 Source: Rowland Water District, Urban Water District Plan, 2011.

FIGURE
4.L.2-1

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On September 9, 2014, RWD adopted Resolution No. 9-2014 establishing a Level 2 Water Supply Shortage under its Water Conservation and Water Shortage Contingency Plan in response to the State-wide drought. This requires a 20 percent reduction in water use and the implementation of specified conservation measures, by all RWD customers. See the Regulatory Framework Summary, Subsection b.(3)(c) for discussion.

(b) Water Sources

(i) MWD (California and Colorado River Aqueducts)

RWD purchases a large amount of its water supply from MWD. MWD consists of 26 member agencies including RWD. MWD is the largest water wholesaler for domestic and municipal uses in Southern California. All 26 member agencies have preferential rights to purchase water from MWD. In 2015, RWD received 12,800 acre-feet of potable water from MWD.

MWD meets the demand for water through assessments of future supply and demand, which are presented in the MWD's Regional Urban Water Management Plan (RUWMP), the most recent prepared in 2010. The RUWMP addresses the future of MWD's water supplies and demand through the year 2035. Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions, (under the most challenging drought conditions) is presented in Table 2-10 of the RUWMP. That analysis indicates that reliable water sources are available to meet demand through 2035. The estimated demand for 2035 is 2,399,000 AFY. The expected water supply, based on current programs, is 2,415,000 AFY, or a surplus of 16,000 AFY. With implementation of programs under development, the supply should increase by 755,000 AFY, resulting in a potential surplus of 771,000 AFY.

MWD also prepares an Integrated Resources Plan (IRP). The IRP provides a water management framework, including plans and programs for meeting future water needs. It addresses issues that can affect future water supply such as changes in climate and environmental regulations. MWD first adopted its IRP in 1996. The most recent IRP was completed in October 2010, and it established a water supply reliability policy of having the full capability to meet full-service demands at the retail level at all times for the MWD and its member agencies. Among other topics, the IRP discusses local water supply initiatives (e.g., local groundwater conjunctive use programs) and establishes a buffer supply to mitigate against the risks associated with implementation of local and imported water supply programs.

In October 2012, MWD released an IRP Implementation Report to report on progress toward implementing the targets from the 2010 IRP Update. The Implementation Report included a summary of foundational actions for MWD's water resource development categories: 1) State Water Project (SWP) supplies; 2) Colorado River Aqueduct; 3) storage and transfers; and 4) managing demands. This most-recent report concluded that MWD continues to take actions and develop programs in support of achieving the long-term goals of the 2010 IRP update.⁵

⁵ *Metropolitan Water District of Southern California, Integrated Water Resources Plan Implementation - Report, October 9, 2012, page 9* http://mwdh2o.granicus.com/Viewer.php?meta_id=64597&view=&showpdf=1. Accessed August 2014.

(ii) Groundwater⁶

RWD lies over the Puente Basin. The overlying land use characteristics of the basin create a situation whereby natural and/or artificial replenishment is virtually nonexistent. Consequently, the aquifer experiences minimal “freshening,” and the water quality of the relatively stagnant water within the basin suffers over time. Also, historical contamination by industrial and manufacturing companies has contributed to water quality degradation. The groundwater quality of the basin does not meet California Department of Public Health (CDPH) potable water criteria due to volatile organic compounds (VOCs), high nitrate concentrations, and high levels of total dissolved solids (TDSs). Therefore, RWD does not use groundwater from the Puente Basin for potable water supplies. However, the quality maintains characteristics similar to recycled water and is suitable for irrigation purposes through RWD’s recycled water distribution system. The groundwater is pumped from Anthony Poli Well No. 1, which can produce an average of 1.75 acre-feet per day. Current static pumping levels average approximately 25 feet below ground surface level. RWD is planning to add one additional groundwater well in the Puente Basin within an easement provided by the City of Industry.

The Puente Basin was adjudicated in 1986 among the RWD, Walnut Valley Water District, City of Industry, and City of Industry Urban Development Agency (former redevelopment agency). The provisions of the Puente Basin Judgment (Judgment) are managed and administered by the court-ordered Watermaster. The basin is managed on an annual operating safe yield concept whereby annually the Watermaster establishes for each party its allocation of the operating safe yield. Thus, the pumping rights allotted to RWD vary year by year.

According to the Judgment, the declared safe yield of the basin is 4,400 AFY. However, the basin is managed on the basis of safe operating yield determined annually by the Puente Basin Watermaster. A safe operating yield of 1,706 AFY was adopted in April 2010.

Pumping rights allocated to RWD varied from 1,104 AFY to 1,307 AFY between 2004 and 2010. The amount of groundwater pumped by RWD from the basin during that period has been far less than allocated, ranging between 0 and 417 AFY and making up between 0 percent and 79.8 percent of RWD’s nonpotable water supply. The RWD 2010 UWMP projects that approximately 1,200 AFY will be pumped from the basin by RWD between 2015 and 2035 (subject to the RWD’s annual allotment from the Watermaster), making up between 15.6 percent and 28.6 percent of RWD’s nonpotable water supply.

In addition to groundwater from the Puente Basin, RWD obtains groundwater from the Carrier groundwater cleanup facility located next to the Anthony Poli Well No. 1. The water produced by this facility provides approximately 500 AFY and is a combination of water from the Puente Basin and the Main San Gabriel Basin.

(iii) Recycled Water⁷

The primary source of RWD recycled water is treated effluent from LACSD’s San Jose Creek WRP. Recycled water from the WRP is conveyed to a pumping station in the City of Industry operated jointly by RWD and the City of Industry, and is then pumped to RWD’s recycled water system for distribution to customers. RWD also has an emergency recycled water connection with Walnut Valley Water District, which extracts groundwater from the Puente and Spadra Basins and obtains recycled water from LACSD’s Pomona WRP.

⁶ Rowland Water District, 2010 Urban Water Management Plan, *op. cit.*, pages 4-2 through 4-9.

⁷ Rowland Water District, 2010 Urban Water Management Plan, *op. cit.*, pages 4-9 through 4-16.

The San Jose Creek WRP provides primary, secondary, and tertiary treatment. In 2010, the WRP treated 77,954 AFY of wastewater, and this is projected to increase to approximately 95,027 AFY by 2020 and 120,636 by 2035. Recycled water from the WRP is used by RWD and other water districts; treated effluent that is not reused is discharged to the San Gabriel River.

In 2010, RWD obtained an estimated 417 AFY of recycled water from the San Jose Creek WRP, all of which was used for landscape irrigation. This is projected to increase to approximately 1,200 AFY by 2020 and to remain constant thereafter through at least 2035. RWD encourages recycled water use by providing financial incentives for such use, and requires such use where RWD recycled water pipelines are in the vicinity and the use of recycled water is both financially feasible and safe to human health.

The recycled component of RWD's nonpotable water supply is regulated by the Los Angeles County Department of Health Services under California Code of Regulations Title 22, Division 4, Chapter 3, sections 60301 through 60355 (Water Recycling Criteria). This includes specific treatment standards, water quality requirements, and limitations on the uses of recycled water (e.g., for irrigation, wildlife habitat, wetlands, industrial reuse, groundwater recharge, seawater barrier, geothermal/energy, and indirect potable reuse).

(iv) Future Water Supply Projects⁸

In 2010, RWD purchased water rights for one AFY within the Central Basin, which gives RWD an option to purchase or lease additional water rights. RWD intends on leasing or purchasing additional rights of approximately 1,500 to 2,500 AFY in the future. RWD is also working with the Main San Gabriel Basin Watermaster to develop a storage agreement that would give RWD the ability to store water in the groundwater basin when supplies are plentiful. In addition, RWD, in partnership with the Walnut Valley Water District and the cities of Azusa and Glendora, has completed a feasibility study looking at refurbishing groundwater production facilities and constructing a water treatment plant in the Puente Basin which could produce as much as 20,000 AFY.

(c) Recent Developments Regarding Water Supply

(i) Restrictions on Water Supply

In January 2014, Governor Brown declared a new State of Emergency in response to the current Statewide drought, and directed State officials to take necessary actions to prepare for these drought conditions. The declaration lists numerous actions to be taken by the State agencies to continue to meet the water needs of Californians. These include such measures as reducing water consumption by State agencies, expediting the processing of water transfers, accelerating funding for water supply enhancement projects, and modifying requirements for reservoir releases or diversion limitations. The directive also called upon local urban water suppliers and municipalities to implement their local water shortage contingency plans immediately to avoid or forestall outright restrictions that could become necessary later in the drought season, and to update their legally required urban and agricultural water management plans, which help plan for extended drought conditions. Finally, the directive initiated a campaign calling on Californians to reduce their water usage by 20 percent.⁹

⁸ Rowland Water District, *2010 Urban Water Management Plan, op. cit., page 4-16.*

⁹ Office of Governor Edmund G Brown Junior, website, "Governor Brown Declares State of Emergency," <http://gov.ca.gov/news.php?id=18368>. Accessed September 3, 2014.

In response to the drought, MWD declared a Water Supply Alert throughout Southern California in February 2014. The alert urged cities, counties, local public water agencies and retailers to achieve extraordinary conservation, and its Board doubled the MWD annual conservation and outreach budget from \$20 million to \$40 million. The increase is intended to provide additional rebate incentives for Southern Californians to purchase water-saving devices throughout the District's six-county service area and help reach the Brown Administration's goal of a Statewide per-capita water use reduction of 20 percent. The alert also encouraged local communities that did not adopt water conservation ordinances during the previous drought to adopt such ordinances at this time.¹⁰

Also in response to the current drought, Governor Brown signed Executive Order B-29-15 in April, 2015. The Order requires an immediate 25 percent mandatory reduction in overall potable urban water use Statewide, from 2013 levels, through at least the end of February 2016.¹¹ This is applicable to all cities, towns, and urban water supplies in California (such as the RWD).¹²

(ii) State Water Project

The amount of water available to the MWD has been affected by litigation regarding the SWP. Federal Endangered Species Act (ESA) litigation filed by several environmental interest groups in the U.S. District Court for the Eastern District of California alleged that existing biological opinions and incidental take statements inadequately analyzed impacts on listed species under the Federal ESA. In May 2007, Federal District Judge Wanger issued a decision on summary judgment, finding the U.S. Fish and Wildlife Service's (USFWS) biological opinion for Delta smelt was invalid. In December, 2007, Judge Wanger issued his Interim Remedial Order requiring that the SWP and Central Valley Project operate according to certain specified criteria until a new biological opinion for the Delta smelt is issued. USFWS released the new biological opinion in December 2008. Based on the Water Allocation Analysis released by California Department of Water Resources (DWR) in December 2008, which analyzed the biological opinion's effects on SWP operations, export restrictions under median hydrologic conditions reduce deliveries to MWD by approximately 500,000 AF.

MWD and other impacted agencies and stakeholders filed separate lawsuits in federal district court challenging the biological opinion, which the federal court consolidated under the caption Delta Smelt Consolidated Cases. On December 14, 2010, Judge Wanger issued a decision on summary judgment, finding that there were major scientific and legal flaws in the Delta smelt biological opinion and remanding the biological opinion to the USFWS for reconsideration. The court's decision invalidates some of the restrictions on project operations contained in the Delta smelt biological opinion. In May 2011, Judge Wanger issued a decision directing the USFWS to complete a new draft biological opinion by October 2011, and to complete a final biological opinion with environmental documentation by December 2013.

In March 2013, DWR announced that it was reducing the allocation of 2013 SWP water from 40 percent to 35 percent of total contracted water deliveries to the SWP contractors. Thirty-five percent of 1,911,500 AFY, which is the MWD's contracted water delivery amount, is 669,025 AFY. This decrease was primarily due to

¹⁰ *Metropolitan Water District, News Release, February 11, 2014, referenced in The Southern California Water Committee Newsletter, <http://www.socalwater.org/news/newsletters/285-february-11-2014>. Accessed August 18, 2015.*

¹¹ *State of California, Executive Department, Executive Order B-29-15, signed April 1, 2015.*

¹² *Ibid.*

the well below-average Statewide snowpack and precipitation. In further response to persistent dry conditions, DWR further reduced the allocation in November 2013, to five percent and in January 2014 to zero. In April 2014, DWR increased the allocation back to five percent based on precipitation, runoff, and water supply conditions at the time.¹³

(iii) Delta Policy Legislation

In November 2009, the State Legislature passed the 2009 Comprehensive Water Package, which consisted of four policy bills and an \$11.14 billion bond proposal designed to ensure a reliable water supply for California's future and to restore the Delta and other ecologically sensitive areas. The Water Bond was approved in the 2014 election.

Senate Bill (SB) X7-1 (Simitian) of the 2009 Water Package established the coequal goals for the Delta: to provide a more reliable water supply for California and to protect, restore, and enhance the Delta ecosystem. SB X7-1 also established a framework to achieve the co-equal goals for the Delta by creating a new Delta governance structure—including the Delta Stewardship Council, Sacramento-San Joaquin Delta Conservancy, and Delta Protection Commission—and laying out a process for determining the consistency of the Bay Delta Conservation Plan (BDCP) with the co-equal goals.

Implementation of the four policy bills in the 2009 Water Package is currently underway, including the parallel development of the Delta Plan—a comprehensive, long-term management plan for the Delta adopted by the Delta Stewardship Council—and the BDCP, which will provide the basis for the issuance of endangered species permits for the operation of the State Water Project and Central Valley Project and for Delta conveyance improvements. The Delta Plan and associated EIR were released in 2013, and the BDCP process was concluded in 2014.

In response to these recent developments in the Delta, MWD is engaged in planning processes that will identify local solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies. In the near-term, MWD will continue to rely on the plans and policies outlined in its RUWMP and IRP to address water supply shortages and interruptions (including potential shut downs of SWP pumps) to meet water demands.

(iv) Global Warming and Climate Change

Global warming and climate change have recently been considered by decisions-makers in planning for the future provision of water services. Potential impacts of climate change on California's water resources include changes in both water and air temperature, changes in precipitation patterns, and changes in sea levels that could increase pressure on the Delta levees. In response to Governor's Executive Order S-3-05, DWR prepared a study in May 2009 entitled "Using Future Climate Projections to Support Water Resources Decision Making in California," which presented an overview of the advances that DWR has made toward using future climate projection information to support decision-making by quantifying possible impacts to

¹³ *California Department of Water Resources, State Water Project website, Notices 13-09, 13-14 14-02, 14-06, 14-07 and 14-08, <http://www.water.ca.gov/swpao/deliveries.cfm>. Accessed September 3, 2014.*

water resources for a range of future climate scenarios. The range of impacts presented indicated the need for adaptation measures to improve the reliability of future water supplies in California.¹⁴

DWR has further addressed the issue of climate change and how it can affect California's water supply by undertaking mitigation and adaptation measures. In 2008, DWR adopted the "Climate Change Adaptation Strategy," which urges a new approach to California's water and other natural resources in the face of changing climate.¹⁵ In 2009, DWR adopted its own Sustainability Policy, and in 2010, DWR established clear and measurable goals for sustainability implementations.^{16,17}

In December 2010, DWR prepared a survey presenting summaries of 13 different reports and studies prepared by DWR addressing climate change entitled "Climate Change Characterization and Analysis in California Water Resources Planning Studies - Final Report." However, DWR does not currently have a standard framework or set of approaches for considering climate change in its planning studies. A variety of approaches to characterize and analyze future climate have been used in various DWR planning studies. The December 2010 paper summarized the approaches and methodologies that have been used since 2006, and lays the groundwork for a future DWR study aimed at developing a standard framework and approaches for characterizing and analyzing climate change.¹⁸

The magnitude and nature of future changes to current climate conditions are uncertain, especially where the relationship between climate change and its potential effect on water demand is not well understood.¹⁹ However, preliminary modeling conducted by DWR indicates that under one climate change scenario, average yearly SWP Table A deliveries in 2050 could be reduced by 10.2 percent.^{20,21} In light of these conclusions, DWR recommends that water decision-makers operate existing water systems to allow for increased flexibility, incorporating climate change research into infrastructure design, conjunctively managing surface water and groundwater supplies, and integrating water and land use practices. As a result, in March 2002, MWD adopted climate change policy principles that relate to water resources that are

¹⁴ California Department of Water Resources, "Using Future Climate Projections to Support Water Resources Decision Making in California," April 2009, page 2, <http://www.energy.ca.gov/2009publications/CEC-500-2009-052/CEC-500-2009-052-D.PDF>. Accessed May 2013.

¹⁵ California Department of Water Resources, *Climate Change Adaptation Strategies for California's Water: Managing an Uncertain Future*, October 2008, <http://www.water.ca.gov/climatechange/docs/ClimateChangeWhitePaper.pdf>. Accessed August 2014.

¹⁶ California Department of Water Resources, Memorandum to All RWD Employees, "Sustainability Workgroup," April 22, 2009, http://www.water.ca.gov/climatechange/docs/Sustainability_Policy.pdf. Accessed August 2014.

¹⁷ California Department of Water Resources, Memorandum to All RWD Employees, "Sustainability Targets," September 20, 2010, http://www.water.ca.gov/climatechange/docs/Memo_sustainability-Sept%202010.pdf. Accessed September 2014.

¹⁸ California Department of Water Resources, "Climate Change Characterization and Analysis in California Water Resources Planning Studies - Final Report," December 2010, page v; http://www.water.ca.gov/climatechange/docs/DWR_CCCStudy_FinalReport_Dec23.pdf. Accessed August 2015.

¹⁹ California Department of Water Resources, "Progress on Incorporating Climate Change into Management of California's Water Resources," July 2006, page 2-54, <http://www.water.ca.gov/climatechange/docs/DWRClimateChangeJuly06.pdf>. Accessed September 2014.

²⁰ *Ibid*, page 4-49.

²¹ Table A water deliveries represent the schedule of the maximum amount of water that water contractors to the RWD may receive annually from the SWP. There are 29 water contractors who have signed long term contractors with the RWD for a total of 4,173 million acre feet per year. Table A deliveries are not guarantees of annual delivery amounts but are used to allocate individual contractors' portion of the delivery amounts available.

reflected in MWD's 2010 IRP.²² Further, in response to climate change and its associated uncertainty, MWD's 2010 RUWMP incorporated three basic elements to promote adaptability and flexibility, important in addressing impacts of climate change: conservation, groundwater recharge, and water recycling.²³

MWD also approved criteria to further explain its position on the conveyance options that are currently being discussed to remedy the Delta, which include addressing projected sea level rise and change in inflows due to climate change. MWD's criteria provide that whatever option is chosen, it should provide water supply reliability, improve export water quality, allow flexible pumping operations in a dynamic fishery environment, enhance the Delta ecosystem, reduce seismic risks, and reduce climate change risks.²⁴

(d) Water Conservation²⁵

In addition to the primary RWD water sources discussed above, water conservation and recycling will play an increasing role in meeting future water demands. RWD has implemented programs to address these issues, with efforts underway to further promote and increase the level of these programs. In 2005, RWD adopted a Mandatory Recycled Water Connection Policy (Ordinance No. 0-7-2005), which provides recycled water at 50 percent of the cost of potable water to encourage recycled water use, requires customers to connect to RWD's recycled water system, and to use recycled water for irrigation and other appropriate purposes, where such connection and use could be done in a manner safe to public health at a reasonable cost to the customer. In 2009, RWD adopted a Water Use Reduction Plan which discourages the waste of potable water by charging higher prices for excessive water use. In 2009, RWD also adopted a Water Conservation and Water Shortage Contingency Plan (Ordinance No. 0-5-2009), which encourages customers to use water efficiently by recommending conservation practices set forth in the Plan. RWD's 2010 UWMP concludes that, with the conservation measures set forth in the above policy and plans, the UWMP's 2015 and 2020 water use reduction targets will be achieved.

(2) Water Infrastructure

The Project Site is located within the service area of RWD, which is responsible for constructing, operating, and maintaining the water conveyance and treatment infrastructure serving the Project Site and the surrounding area (including but not limited to the unincorporated community of Rowland Heights and the southern portion of the City of Industry). RWD owns, operates, and maintains approximately 150 miles of water distribution mains, 3,020 fire hydrants, and 13,978 customer service connections.²⁶

No domestic water lines currently serve the Project Site.²⁷ Existing water lines in the vicinity include a 12-

²² Metropolitan Water District of Southern California, *Integrated Water Resources Plan, 2010 Update, Report No. 1373, October 2010*, http://www.mwdh2o.com/PDF/About_Your_Water/2.4.1_Integrated_Resources_Plan.pdf#search=report%20no.%201373. Accessed September 2014.

²³ Metropolitan Water District of Southern California, *The Regional Urban Water Management Plan, November 2010*, http://www.mwdh2o.com/PDF/About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf#search=regional%20urban%20water%20management%20plan. Accessed September 2014.

²⁴ Metropolitan Water District of Southern California, *Report from Water Planning and Stewardship Committee for Board of Directors Meeting on Agenda Item 8-4, September 11, 2007*, <http://edmsidm.mwdh2o.com/idmweb/cache/MWD%20EDMS/003697655-1.pdf>. Accessed September 2014.

²⁵ Rowland Water District, *2010 Urban Water Management Plan, op. cit., page 3-11*.

²⁶ Rowland Water District, *2010 Urban Water Management Plan, op. cit., page 2-1*.

²⁷ Dave Shubin, Rowland Water District, email correspondence, July 17, 2015.

inch line located within the UPRR/Metrolink railroad track right-of-way and a 12-inch line in the Gale Avenue right-of-way.²⁸ Recycled water infrastructure exists in the Project vicinity.

b. Regulatory Framework Summary

Following is a discussion of the regulatory plans, regulations, and requirements related to wastewater collection and treatment applicable at the Project Site.

(1) Federal

(a) Safe Drinking Water Act

The primary federal legislation concerning domestic water supply is the Safe Drinking Water Act (SDWA) of 1974. The SDWA provides the U.S. Environmental Protection Agency (USEPA) with the authority to regulate the quality of water supplies. The SDWA required USEPA to set interim primary drinking water regulations that establish recommended maximum contamination levels (RMCLs) for each contaminant that may have an adverse effect on human health. Since promulgation of the National Primary Drinking Water Regulations, USEPA has developed additional drinking water quality standards for volatile organic chemicals, fluoride, surface water treatment, total coliform bacteria, lead, copper, synthetic organic contaminants, and inorganic contaminants. All domestic water supplies are required to meet these standards.

(2) State

(a) California Urban Water Management Planning Act (Assembly Bill 797)

The California Urban Water Management Planning Act (California Water Code [CWC] Division 6, Part 2.6, Sections 10610-10656) addresses several State policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The Act also requires water suppliers to develop water management plans every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Specifically, municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 AFY of water must adopt an UWMP.

(b) Senate Bill 610

State legislation addressing water supply, Senate Bill (SB) 610, became effective January 1, 2002. SB 610, codified in CWC Section 10910 et seq., describes requirements for both water supply assessments (WSAs) and UWMPs applicable to the California Environmental Quality Act (CEQA) process. SB 610 requires that for projects subject to CEQA which meet specific size criteria, the water supplier must prepare a WSA that determines whether the projected water demand associated with the proposed project is included as part of the most recently adopted UWMP. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' water deliveries received by the public water system. In addition, it must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610 and Section 10912 of the CWC, projects subject to CEQA and requiring completion of a WSA include the following:

²⁸ *Ibid.*

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sf of floor area;
- Mixed-use projects that include one or more of the projects specified in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500 dwelling unit project.

The WSA must be approved by the public water system at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA.

(c) California Code of Regulations

(i) Title 20

Title 20, Sections 1605.1(h) and 1605.1(i) of the California Code of Regulations (CCR) establishes efficiency standards (maximum flow rates) for all new federally regulated plumbing fittings and fixtures, including such fixtures as showerheads, lavatory faucets, and toilets. Among the standards, the maximum flow rate for showerheads and lavatory faucets are 2.5 gpm at 80 pounds per square inch (psi) and 2.2 gpm at 60 psi, respectively. The standard for toilets is 1.8 gallons per flush. In addition, Section 1605.3(h) establishes State efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.

(ii) Title 24, Part 11

Part 11 of Title 24, the title that regulates the design and construction of buildings, establishes the California Green Building Standards Code (CALGreen). The purpose of CALGreen is to improve public health, safety and general welfare by: 1) enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and 2) encouraging sustainable construction practices in the categories of planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. CalGreen includes both mandatory measures and voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

(d) State Executive Order B-29-15²⁹

In response to the current drought conditions, Governor Brown signed Executive Order B-29-15 on April 1, 2015. The Order requires an immediate 25 percent mandatory reduction in overall potable urban water use Statewide, from 2013 levels, through at least February 28, 2016. This is applicable to all cities, towns, and urban water supplies in California (such as the RWD). The Order also requires RWD to provide funding to allow for lawn replacement programs; requires the California Energy Commission to provide rebates for water-efficient appliances; prohibits irrigation of ornamental turf on public street medians with potable water; use of only drip or microspray irrigation systems in new residential construction; and requires urban water suppliers to develop rate structures and other pricing mechanisms, including but not limited to surcharges, fees and penalties, to maximize water conservation consistent with Statewide water restrictions.

(e) State Water Resources Control Board 2015 Emergency Water Conservation Regulations³⁰

On March 17, 2015, the State Water Resources Control Board (SWRCB) adopted Emergency Water Conservation Regulations in response to California's current drought and State Executive Order B-29-15 (discussed above). The Regulations identify mandatory water conservation requirements for all Californians including, but not limited to, the following:

- Prohibits:
 - Using potable water to wash sidewalks and driveways;
 - Allowing runoff when irrigating with potable water;
 - Using hoses with no shutoff nozzles to wash cars;
 - Using potable water in decorative water features that do not recalculate the water;
 - Irrigating outdoor areas within 48 hours following measurable rainfall;
 - Serving water to customers in restaurants unless the customer requests it; and
 - Irrigating outdoor areas more than two days per week.
- Requires:
 - Hotels and motels to offer their guests the option to not have their linens and towels laundered daily; and
 - Large urban water suppliers (serving >3000 connections) to:
 - Impose restrictions on outdoor irrigation;
 - Notify customers about leaks that are within the customer's control;
 - Report on water use monthly; and
 - Report on compliance and enforcement.

²⁹ State of California, Executive Department, Executive Order B-29-15, signed April 1, 2015.

³⁰ State Water Resources Control Board, 2015 Emergency Water Conservation Regulations Fact Sheet, http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/fs_conservreg_032715.pdf. Accessed June 17, 2015.

Violations of prohibited activities are considered infractions punishable by fines of up to \$500 per day. Furthermore, the State Water Board can issue cease and desist orders and fines against water agencies that do not impose mandatory outdoor irrigation restrictions on their customers. The regulations are in effect through at least the end of 2015.

(3) Regional

(a) RWD Urban Water Management Plan³¹

In accordance with the California Urban Water Management Planning Act, RWD adopted its 2010 UWMP in 2011. The UWMP details RWD's efforts to promote the efficient use and management of its water resources, and incorporates the water conservation mandates of SB 7. The UWMP used a service areawide method in developing its water demand projections. This methodology does not rely on individual development demands to determine areawide growth. Rather, the growth in water use for the entire service area was considered in developing long-term water projections for the RWD service area for the next 25 years based on resident per-capita water use factors within the RWD and a one percent annual growth rate. The 2010 UWMP addresses priorities and water supply and demand forecasts through 2035.

UWMPs are updated on five-year intervals, each updated UWMP incorporating the most recent Southern California Association of Governments (SCAG) projections and findings of recent WSAs for new development projects as required by California law. This process entails, among other requirements, an update of water supply and water demand projections for water agencies. Therefore, the next RWD UWMP will be prepared in mid-2015 (adopted in mid-2016), and will evaluate the status of water supply and demand in light of recent drought conditions and weather conditions occurring at the time of its preparation.

(b) RWD Water Use Reduction Plan

In 2009, the RWD adopted a Water Use Reduction Plan, which is an inclining rate structure that encourages the conservation of potable water and discourages potable water waste by charging higher prices for excessive water use.

(c) RWD Water Conservation and Water Shortage Contingency Plan³²

In 2009, the RWD adopted a Water Conservation and Water Shortage Contingency Plan (Ordinance No. 0-5-2009), which encourages customers to use water efficiently by recommending conservation practices set forth in the Plan. The Plan further empowers the RWD to declare Level 1 through Level 4 Water Supply Shortages under certain conditions, under which all customers would be subject to increasingly stringent mandatory reductions in water use and mandatory water conservation measures or face fines and/or the installation of flow restrictors.

On September 9, 2014, RWD adopted Resolution No. 9-2014 establishing a Level 2 Water Supply Shortage under the Plan. This requires a mandatory 20 percent reduction in water use and the mandatory implementation of the following water conservation measures by all customers:

³¹ Rowland Water District, *2010 Urban Water Management Plan*, *op. cit.*

³² Rowland Water District, *Ordinance No. 0-5-2009, adopted May 12, 2009, and the Rowland Water District website, <http://www.rowlandwater.com/drought-update/>. Accessed June 17, 2015.*

- No watering or irrigation with potable water between 8 A.M. and 5 P.M.;
- No irrigation with potable water except on Mondays and Fridays;
- When washing cars with a hose, use of a nozzle with an automatic shutoff;
- Repair of leaks, breaks and malfunctions in the customer's plumbing within 24 hours of discovery;
- Limiting use of potable water for construction and dust control, and only using potable water for construction and dust control when approved by RWD;
- Limiting use of fire hydrant water to that necessary to maintain public health, safety and welfare;
- No filling or refilling of ornamental lakes or ponds, except to sustain existing aquatic life; and
- No emptying or refilling of swimming pools, spas, and ponds for cleaning purposes.

(d) RWD - Mandatory Recycled Water Connection Policy³³

In 2005, the RWD adopted a Mandatory Recycled Water Connection Policy (Ordinance No. 0-7-2005), which it updated in 2010 (Ordinance No. 0-9-2010). The Policy provides recycled water at 50 percent of the potable water rate to encourage recycled water use. The Policy also requires customers to connect to RWD's recycled water system and to use recycled water for irrigation and other appropriate purposes, where RWD recycled water lines are in the vicinity, and where such connection and use could be done in a manner safe to public health at a reasonable cost to the customer. The Policy also identifies the mandatory uses of recycled water where the above conditions apply, including for agricultural irrigation, construction use, landscape irrigation, landscape and/or recreation impoundments, and wildlife habitat. The Policy further requires that, where the above conditions apply, new development include the recycled water distribution infrastructure required to serve the new development.

(4) County

(a) County of Los Angeles Green Building Standards Code (Title 31)

In 2008, Los Angeles County adopted the Green Building Program, which included the Green Building Ordinance, Low Impact Development (LID) Ordinance, and Drought-Tolerant Landscaping Ordinance. The County also created an Implementation Task Force and Technical Manual. In November 2013, in response to the mandates set forth in the 2010 CALGreen, the Board of Supervisors adopted the Los Angeles County Green Building Standards Code (Title 31). Among other things, the Green Building Standards Code promotes water conservation by requiring the installation of smart irrigation controllers and high-efficiency toilets, design features that maximize the infiltration of stormwater for groundwater recharge, landscaping using drought-tolerant species, and limiting turf areas.

(5) Local

(a) City of Industry Municipal Code

Title 13 (Water and Sewers), Chapter 13.18 (Water Efficient Landscapes). New landscape installations and landscape rehabilitation projects over certain sizes are required to comply with the City's Water Efficient Landscape Ordinance, Municipal Code Chapter 13.18. The Water Efficient Landscape Ordinance

³³ Rowland Water District, Ordinance No. 0-9-2010, adopted September 14, 2010.

contains requirements for landscape design and irrigation design. Where available and consistent with public health guidelines, irrigation systems must use recycled water.

(b) City of Industry General Plan Update - Resource Management Element

- **Policy RM-1-1.** Work with local water providers to construct, maintain, and upgrade our water supply, transmission, storage and treatment facilities to support existing and new development.
- **Policy RM1-2.** Encourage the use of recycled water.
- **Policy RM1-3.** Encourage the conservation of water resources through the use of drought-tolerant plans and water-saving irrigation systems.

3. ENVIRONMENTAL IMPACTS

a. Methodology

(1) Water Supply

The RWD has determined that the Project does not meet the SB 610 thresholds for preparing a WSA and that a WSA therefore is not required for the Project.³⁴ In place of summarizing WSA results, the water supply analysis in this section determines whether water supply is adequate to serve the Proposed Project by comparing RWD's 2020 projected water supply to Project plus RWD's 2020 projected water demand. Year 2020 is used as the analysis year because it represents the anticipated buildout year of the Project, while the RWD's 2020 water supply and water demand estimates used are those from the RWD 2010 UWMP. This analysis methodology accounts for cumulative water demand because it utilizes 2020 rather than existing (2015) RWD demand, and because the RWD 2020 demand estimate used is a district-wide estimate.

The potable water demand estimate for the proposed Project was assumed by the RWD to be equivalent to Project wastewater generation, while the nonpotable water demand estimate for the proposed Project was assumed to be 20 percent of Project potable water demand. This is a conservative analysis because credit was not given for the water savings to be realized associated with the use of the water-conserving water fixtures and appliances required by Titles 20 and 24 of the CCR.

The size of the proposed on-site water infrastructure system (described in Subsection 3.c, below) was determined by the Project's civil engineer based on the domestic and fire flow requirements of each of the six proposed on-site buildings.³⁵

(2) Water Infrastructure

The analysis of water infrastructure capacity in this section is based on the determination from the RWD that water infrastructure is adequate to serve the proposed Project. Impacts regarding water sufficiency for fire-fighting purposes are addressed in Section 4.J.1, Fire Protection and Emergency Services, of this Draft EIR.³⁶

³⁴ Dave Warren, Director of Operations, Rowland Water District, email dated October 7, 2015.

³⁵ Correspondence with Julianne Fabrizio, P.E., Thienes Engineering, Inc., September 2015.

³⁶ Ken Deck, General Manager, Rowland Water District, letter dated January 27, 2014 (provided in Appendix J-2 of this Draft EIR).

b. Thresholds of Significance

The Los Angeles County Department of Regional Planning Initial Study Checklist provides a set of screening questions that address impacts with regard to water infrastructure and supply. These questions are as follows:

18. Utilities and Service Systems. Would the project:

- b) Create water or wastewater system capacity problems, or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- d) Have sufficient reliable water supplies available to serve the project demands from existing entitlements and resources, considering existing and projected water demands from other land uses?

Based on these factors, the Project could have a potentially significant impact on water infrastructure or water supply if:

WATER-1: It would create water system capacity problems or require new or expanded water facilities, the construction of which would cause significant environmental effects.

WATER-2: Sufficient reliable water supplies are not available to serve Project demand from existing entitlements and resources, considering existing and projected water demands from other land uses.

c. Project Characteristics or Design Features

An on-site water supply system is proposed that would convey water from the existing off-site RWD 12-inch water main in Gale Avenue to the proposed on-site land uses via 10-inch hot taps located in the Gale Avenue right-of-way. Water for domestic use would be provided via new on-site 10-inch water lines with 10-inch water taps and 2-inch domestic water meters as required by RWD Installation Specifications, while water for fire service water be provided via new on-site 10-inch lines which would split off into six-inch lines for hydrants and fire sprinkler services to the buildings.³⁷ Design features proposed to reduce Project water consumption include the following:

PDF-WATER-1: The Project will use drought-tolerant and water efficient landscaping in accordance with the County's Green Building Standards and the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Program, and will use low-flow fixtures (e.g., toilets, urinals, faucets, showerheads, etc.) and smart irrigation controls in accordance with the LEED® Program and Titles 20 and 24 of the CCR.

³⁷ Correspondence with Julianne Fabrizio, P.E., Thienes Engineering, Inc., September 2015.

PDF-WATER-2: Because existing recycled water pipelines are located in the Project vicinity, the Project Applicant will consult with the Rowland Water District regarding potential use of recycled water for Project Site landscape and irrigation as required by RWD's Mandatory Recycled Water Connection Policy (Ordinance No. 0-7-2005 as updated by Ordinance No. 0-9-2010).

d. Project Impacts

(1) Project Construction

Threshold WATER-1: A significant construction-related water impact would occur if the Project would require new or expanded water facilities, the construction of which would cause significant environmental effects.

Impact Statement WATER-1: *Construction of the water infrastructure required to serve the proposed Project would not result in significant environmental effects. Impacts would be less than significant.*

The proposed Project would require construction of a new on-site sanitary water and fire water conveyance system (pipelines) and the connection of this system to the existing 12-inch water pipeline in Gale Avenue. This would require on-site trenching for the water lines and welding activities to connect the new hardware. No active water lines serving adjacent properties bisect the Project Site, so there would be no potential to interrupt water service to adjacent properties (such as due to inadvertent damage of existing lines) during construction. Furthermore, the environmental effects associated with trenching and other activities required to install and connect the on-site water system are addressed as part of the larger construction-related impacts of the proposed Project in the appropriate impact sections of this Draft EIR (e.g., Sections 4.B, Air Quality, 4.E, Geology and Soils, 4.G, Hydrology and Water Quality, etc.). No additional environmental effects would occur.

(2) Project Operation

(a) Water Supply

Threshold WATER-2: A significant operational water supply impact would occur if sufficient reliable water supplies are not available to serve Project demand from existing entitlements and resources, considering existing and projected water demands from other land uses.

Impact Statement WATER-2: *Sufficient reliable water supplies are available from existing entitlements and resources to serve Project demand, considering the existing and projected water demand of other land uses within the Rowland Water District. Impacts would be less than significant.*

Table 4.L.2-2, RWD Service Population, Water Demand and Water Supply Through 2035, summarizes the service population, water demand, and water supply in the RWD service area through 2035, as identified in the RWD 2010 UWMP. As indicated, water supply exceeded demand in the service area in the past and is projected to continue to do so through at least 2035.

Assuming that construction of the Project would commence beginning in early 2017, and that construction of each of the two Project phases would be consecutive, Project buildout would occur around early 2020. With

Table 4.L.2-2

RWD Service Population, Water Demand and Water Supply Through 2035

Service Population						
Service Population	2010	2015	2020	2025	2030	2035
Service Area Population	62,106	70,005	76,611	84,227	87,905	91,771
Water Demand (AFY)						
Water Demand Source	2010 ^a	2015 ^b	2020 ^b	2025 ^b	2030 ^b	2035 ^b
Potable Water	10,990	12,727	13,484	14,693	15,437	16,218
Nonpotable Water	523	3,000	5,000	6,500	6,500	6,500
Total	11,513	15,727	18,484	21,193	21,937	22,718
Water Supply (AFY)						
Water Supply Source	2010	2015	2020	2025	2030	2035
Potable Water	10,990	12,800	13,500	14,700	15,500	16,300
Nonpotable Water	523	4,200	6,200	7,700	7,700	7,700
Total	11,513	17,000	19,700	22,400	23,200	24,000

AFY = acre-feet per year.

^a Based on actual water used.

^b Based on a projection using a per capita water use factor tied to service population.

Source: Rowland Water District, 2010 Urban Water Management Plan, Tables 2-3, 3-11, and 4-1, adopted July 2011.

Project demand for an estimated 146 AFY of potable water following buildout in 2020,³⁸ water demand within the RWD would increase from 13,484 AFY to 13,630 AFY. Because this would be within RWD's potable water supply between the years of 2020 and 2025 (13,500 AFY and 14,700 AFY, respectively), it is anticipated that adequate potable water supply would be available to serve the Project. Similarly, with an estimated demand for the Project for 29 AFY of nonpotable water by buildout in 2020 (which assumes 20 percent of potable water demand is for landscape irrigation), nonpotable water demand within the RWD would increase from 5,000 AFY to 5,029 AFY. Because this would fall within the RWD's 2020 nonpotable water supply of 6,200 AFY, adequate nonpotable water supply would be available to serve the Project. Therefore, water supply impacts would be less than significant.

(b) Water Infrastructure

Threshold WATER-3: A significant operational water infrastructure impact would occur if the Project would create water system capacity problems.

Impact Statement WATER-3: *The existing water system has adequate capacity to provide the additional water required by the proposed Project. Impacts would be less than significant.*

³⁸ Potable water demand for the Project is assumed to be the equivalent of estimated Project wastewater generation (129,882 gallons per day [gpd]), as defined in Section 4.L.1, Wastewater, of this Draft EIR. Nonpotable water demand is assumed to be equivalent to 20 percent of potable water demand (25,831 gpd or 29 AFY).

The Rowland Water District has indicated that it has adequate potable and recycled water infrastructure in the Project vicinity to serve the Project's increased demand.³⁹ Accordingly, and impacts on this infrastructure would be less than significant.

e. Cumulative Impacts

(1) Water Supply

With respect to cumulative water supply impacts, the Project-specific analysis in Subsection 3.d.2.a, above, also represents the cumulative analysis because it considers water demand and supply within the whole of the RWD at Project buildout in 2020. As indicated, because cumulative plus Project water demand in 2020 would not exceed RWD's 2020 water supply, the Project's contribution to cumulative water supply impacts of the proposed Project would be less than cumulatively considerable.

(2) Water Infrastructure

The related projects identified in Chapter 3.0, General Environmental Setting, of this Draft EIR, are all south of SR-60 and not in the Project vicinity. Each related project would be reviewed by RWD, which operates and maintains all water conveyance infrastructure serving the Project Site and the surrounding area, to ensure its infrastructure could adequately serve those projects. Because of this and because the same infrastructure is not anticipated to serve the Project and the related projects, the Project, considered together with the related projects, is not anticipated to have a cumulatively considerable contribution to cumulatively significant impacts on water infrastructure.

4. MITIGATION MEASURES

No mitigation measures are required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The water supply and water infrastructure impacts of the proposed Project would be less than significant. Therefore, no mitigation measures are required, and no significant unavoidable adverse water supply or water infrastructure capacity impacts would occur.

³⁹ Ken Deck, General Manager, Rowland Water District, letter dated January 27, 2014 (provided in Appendix J-2 of this Draft EIR).

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5. ALTERNATIVES

5.0 ALTERNATIVES

A. INTRODUCTION

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. CEQA Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

Direction regarding the definition of project alternatives is provided in State *CEQA Guidelines* Section 15126.6(a) as follows:

*An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*¹

State *CEQA Guidelines* emphasize that the selection of project alternatives be based primarily on the ability to reduce significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."² The State *CEQA Guidelines* further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.³

In selecting project alternatives for analysis, potential alternatives should be feasible. State *CEQA Guidelines* Section 15126(f)(1) explains that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site...

Beyond these factors, State *CEQA Guidelines* require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally

¹ State *CEQA Guidelines*, Section 15126.6(a).

² *Ibid.*, Section 15126.6(b).

³ *Ibid.*, Section 15126.6(f).

superior alternative is the No Project Alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.⁴

Section 15126.6(d) of the State *CEQA Guidelines* states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed project. Rather, the EIR is required to provide sufficient information to allow meaningful evaluation, analysis, and comparison with the proposed project.⁵ If an alternative would cause one or more significant impacts in addition to those of the proposed project, analysis of those impacts is to be discussed, but in less detail than for the proposed project.

Of the various alternatives available for evaluation, the process of selecting Project alternatives to be analyzed in this EIR considered the potential for significant effects associated with the Project, a review of the basic objectives established for the Project (outlined in Chapter 2.0, Project Description, and in subsection 1, below), and consideration of the land use plans applicable to the Project Site. The analysis included in Chapter 4.0 of this EIR concluded that the Project would result in significant unavoidable operational traffic and mobile source air quality impacts. Based on these factors, the alternatives that were selected for analysis include:

- **No Project/No Build Alternative:** Under the No Project/No Build Alternative, no improvements related to the Project would occur. Following completion of the Alameda Construction Authority's (ACE) Nogales Street Grade Separation Project, the temporary improvements on the Site would be removed, and the Project Site would return to a vacant, undeveloped state.
- **Reduced Intensity Alternative:** The Reduced Intensity Alternative proposes to reduce the Project's development program by approximately 105,384 square feet (23 percent) by omitting the high-turnover restaurant use, reducing the floor area of other commercial uses on Parcel 1 by 20 percent, reducing the number of guestrooms in each hotel by 20 percent, and developing Hotel B on Parcel 3 as an "all-suites" hotel. All guestrooms in Hotel B would be suites and include kitchenettes. Amenity space in Hotels A and B (meeting rooms, breakfast lounge, and fitness center) would be unchanged from the Project. Hotels A and B would be five stories and approximately 60 feet in height above grade (to top of parapet), with rooftop mechanical equipment up to 68 feet above grade.
- **Code Compliant Commercial Alternative:** The Code Compliant Commercial Alternative would develop the Project Site in conformance with the underlying land use designation and zoning regulations. The requested Zone Change (from M-1.5 to C-3-[DP]) for Parcels 2 and 3 would not be sought, and the entire portion of the Project Site within the unincorporated County would remain in the M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion) zone. Since hotel uses are prohibited in the M-1.5 zone, the portion of the Project Site proposed for development with hotel uses would instead be developed with commercial uses permitted in the M-1.5 zone. No Tentative Tract Map application would be filed to subdivide the portion of the Project Site within the unincorporated County.
- **Code Compliant Light Industrial/Warehouse Alternative:** The Code Compliant Light Industrial/Warehouse Alternative would develop the Project Site in conformance with its underlying land use designation and zoning regulations. The requested Zone Change (from M-1.5 to C-3-[DP])

⁴ *Ibid.*, Section 15126.6(e)(2).

⁵ *Ibid.*, Section 15126.6(d).

for Parcels 2 and 3 would not be sought, and the entire portion of the Project Site within the unincorporated County would remain in the M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion) zone. Since hotel uses are prohibited in the M-1.5 zone, the Project Site would be developed with light industrial and warehouse uses similar to the light industrial parks in the Project vicinity and permitted in the M-1.5 zone. No Tentative Tract Map would be filed to subdivide the portion of the Project Site within the unincorporated County.

B. OBJECTIVES OF THE PROPOSED PROJECT

The underlying purpose and primary objective of the Project is to provide for the development of a high-quality, integrated development of complementary commercial retail establishments and hotels that promote economic growth and jobs creation within a commercial and light industrial corridor. Chapter 2.0, Project Description, of this Draft EIR sets forth the following specific objectives sought by the Project Applicant:

1. Commercial/Retail Objectives

1. Address the existing shortage of commercial retail options in the Project area (i.e., the southeastern San Gabriel Valley), and expand the variety of such options to serve Rowland Heights community residents.
2. Locate new commercial development in close proximity to existing commercial and light industrial uses to avoid displacing residential uses or introducing incompatible land uses, but in close proximity to the existing residential population south of the Project Site and SR-60 and the existing daytime employee population to the north, east, and west.
3. Take advantage of the large buildable lot area to develop a high-quality, low-rise commercial center with a diversity of tenant spaces (retail, restaurant, and office space on two floors) to attract high-quality tenants.
4. Ensure a variety of commercial uses are accommodated—including retail, restaurant, and office uses—to provide a range of goods and services to the community.
5. Promote and support local, regional, and State mobility objectives to reduce vehicle miles traveled and infrastructure costs by siting new commercial infill development in proximity to existing local bus lines and a commuter rail station and providing facilities to support and encourage the use of bicycles.

2. Hotel Objectives

1. Accommodate the growing need for hotel options and meeting facilities that meet corporate and commercial demand generated by businesses in the San Gabriel Valley, leisure and tour group demand generated by pleasure travelers in the San Gabriel Valley and larger Los Angeles area, and group demand for social events and business and association meetings.
2. Provide a high-quality extended stay hotel in the currently underserved eastern San Gabriel Valley market where no comparable hotel product exists and demand for longer-term stays for family vacationers and business travelers is increasing.

3. Provide business travelers with local options for hotel stays, thereby reducing vehicle miles traveled.
4. Site proposed new mid-rise hotels in a high-visibility location with freeway access.
5. Co-locate complementary hotel uses (at a height and scale appropriate for the commercial/industrial corridor in which the Project Site is situated, in conformance with Development Program review criteria) and commercial uses, including retail and restaurant uses, to provide local shopping and dining options for hotel guests.

3. Siting and Design Objectives

1. Create an activity node for the Project area, and ensure a consistently high level of pedestrian activity during the day and the evening by co-locating a sufficiently diverse concentration of hotels and commercial uses with different peak activity periods.
2. Maximize efficient use of the Project Site through the use of shared parking that accommodates peak demand for on-site uses.
3. Incorporate underground structured parking to minimize lot coverage dedicated to surface parking and take advantage of the natural slope of the Site.
4. Enhance the pedestrian experience along Gale Avenue, and provide street-level pedestrian connectivity to the Project Site through the provision of landscaped setbacks on the Project's street frontage, landscaped pedestrian walkways through the Project Site, and a dedicated pedestrian connection separate from vehicle driveways.
5. Provide on-site common open space amenities in response to community input related to visual enhancement of the parking field and for the use of Project patrons and employees.

4. Economic and Employment Objectives

1. Create a viable mix of complementary retail, office, and hotel uses of a sufficient size to create internal synergy and attract outside patrons.
2. Contribute to the economic health of the Rowland Heights community through jobs creation, including short-term construction trade jobs and long-term service and professional employment opportunities.
3. Generate revenue for the County through net new sales and room taxes.

C. ALTERNATIVES CONSIDERED AND REJECTED

In accordance with State *CEQA Guidelines* Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible, and should briefly explain the reasons for rejection. According to the State *CEQA Guidelines*, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failures to meet most of the basic project objectives (outlined above), the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts.

1. Alternative Location

CEQA does not require that analysis of alternative sites always be included in an EIR. However, if all the surrounding circumstances make it reasonable to consider an alternative site, then this Alternative should be considered and analyzed in the EIR. In making the decision to include or exclude analysis of an alternative site, the “key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR”.⁶

Among the factors that may be considered when addressing the feasibility of alternatives is site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.⁷

The Project Site is unique in the Project area (Rowland Heights and vicinity) because of its size, currently undeveloped state, availability for development, and central location with respect to the sizeable daytime employee population and 24-hour residential populations within the City of Industry and community of Rowland Heights, respectively. The Project Site is also highly visible and easily accessible from major roadways (Gale Avenue, Nogales Street) and SR-60.

Within unincorporated Los Angeles County, in the Project area (Rowland Heights), there is a scarcity of vacant, privately owned properties similarly sized to the Project Site, are proximate to existing public services with easy access from an existing public road and freeway visibility, and are near compatible uses. The remainder of the light industrial/commercial corridor paralleling SR-60 and UPRR/MetroLink rail right-of-way is almost entirely developed. Land uses north and west of the Project Site are within the City of Industry and predominantly light industrial, with little or no commercial uses that the Project would complement. Land uses to the northeast are within the cities of Walnut and West Covina, which have their own commercial centers. Land uses south of the Project Site and SR-60, with the exception of the Colima Road commercial corridor, are predominantly residential (including single-family residential neighborhoods) and protected hillside open space, which are less compatible with the Project’s proposed uses. Colima Road frontage is already largely built out with a mix of shopping centers, big box retail stores, and multifamily housing, and is less visible and accessible from the freeway.

Moreover, selection of another undeveloped parcel in the vicinity would likely result in impacts similar or greater to those of the Project. Potentially significant and unavoidable traffic impacts and operational air quality impacts would likely still occur because Project-related trip generation and associated emissions would be unchanged; redevelopment of an occupied site could allow trip credits that would reduce net new trip generation and intersection impacts, but vehicle emissions would remain unchanged. Selection of an occupied site for redevelopment with the Project could also displace existing uses and necessitate building demolition in addition to grading, excavation, and construction. Finally, development or redevelopment of another site could result in new environmental impacts because of closer proximity to residential or other sensitive uses. Since it is uncertain, and even unlikely, that development of another site with the proposed

⁶ *State CEQA Guidelines, Section 15126.6(f)(2)*

⁷ *Ibid., Section 15126.6 (f)(1)*

Project uses would substantially reduce significant environmental impacts, and because the Project Applicant does not own any other unentitled properties in the Project area, this Alternative was rejected from further consideration.

2. Alternative Uses

a. Office Uses

Development of the Project Site with office uses, or a mix of commercial and office uses, would be compatible with the underlying General Plan (Community Plan) land use designation and zoning designation. However, even at a lower development intensity than the maximum permitted on the Project Site under existing zoning, office uses would substantially increase weekday trip generation during the A.M. and P.M. peak periods compared to the Project. This would result in new significant traffic impacts at traffic study area intersections during these periods, including potentially significant and unavoidable weekday impacts at the same intersections as impacted during the weekend midday peak period under the Project. In contrast, because the Project's mix of uses is sufficiently diverse and largely commercial, associated trip generation peaks are complementary in terms of timing and would occur during the Saturday mid-day peak period, avoiding weekday A.M. and P.M. peak periods. Importantly, office uses would also not achieve the numerous Commercial/Retail and Hotel Project Objectives related to the provision of goods and services to serve the existing daytime employee population in the Project area and residential population of Rowland Heights, and increasing the variety of commercial options in the Project area.

b. Residential Uses

The underlying General Plan land use designation and zoning do not permit residential uses, and a General Plan amendment and Zone Change would be required for such a proposal. Residential land uses on the Project Site would not be compatible with adjacent land uses. Long-term residential uses are more sensitive to noise and air quality than commercial uses, and proximity to the UPRR/Metrolink freight/passenger rail right-of-way immediately north of the Project Site and SR-60 75 and 300 feet to the south reduce the suitability of the site for residential uses. This is likely to result in significant health risk impacts to residents, who would experience long-term exposure to diesel and other emissions from the freeway and rail line, which supports up to 48 freight trains and 14 commuter rail trains per day. Residential uses also would be less compatible with, and would not be buffered from, existing light industrial uses to the north and commercial development to the east, west, and across Gale Avenue. Finally, development of the Project Site with residential uses would decrease trip generation compared to the Project, but would concentrate trips during the weekday A.M. and P.M. peak periods, which could increase circulation and intersection impacts in the traffic study area compared to the Project.

D. ANALYSIS FORMAT

In accordance with State *CEQA Guidelines* Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the project. Furthermore, each alternative is evaluated to determine whether the

Project Objectives, identified in Chapter 2.0, Project Description, and above, would be substantially attained by the alternative.⁸ The evaluation of each of the alternatives follows the process described below.

- A description of the alternative.
- The net environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental issue area analyzed in the EIR are described. Where applicable, the evaluation is divided between temporary impacts that would occur during the Project's construction phase and impacts that would occur during the Project's operational phase.
- Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area. Where the net impact of the alternative will be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact will be clearly more adverse or less beneficial than the project, the comparative impact is said to be "greater." Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar." The evaluation also documents whether compared to the Project an impact would be entirely avoided, whether a significant impact could be reduced to a less than significant level, or whether a significant unavoidable impact would be feasible to mitigate to a less than significant level.
- The comparative analysis of the impacts is followed by a general discussion of the whether the underlying purpose and Project Objectives are substantially attained by the alternative.

At the end of each alternative section, a relative comparison of the alternative's impacts and consistency with Project Objectives is provided. Pursuant to State *CEQA Guidelines* Section 15126.6(e)(2), an "Environmentally Superior Alternative" is identified.

⁸ *Ibid*, Section 15126.6(c).

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5.0 ALTERNATIVES

A. ALTERNATIVE 1: NO PROJECT/NO BUILD ALTERNATIVE

A. DESCRIPTION OF THE ALTERNATIVE

Under the No Project/No Build Alternative, the commercial and hotel development proposed under the Project would not occur and the Project Site would be returned to its vacant, unimproved state. Upon completion of construction of the ACE Nogales Street Grade Separation Project (unrelated to the Project), ACE would remove the temporary improvements that have been constructed on the Project Site, including the New Charlie Road detour, adjacent sidewalk, construction staging and access road, and temporary parking stalls on the east side of the Project Site. Associated temporary storm drain improvements would also be removed, including the catch basins at the northern end of New Charlie Road and the dual concrete box culvert/bridge crossing for the on-site, partially channelized storm drain. To the extent practicable, pre-construction on-site elevations would be restored and earthwork spoils would be removed, leaving behind limited topography and ruderal vegetation in areas of former agricultural cultivation, dirt roads, and graded areas along former ACE roadway alignments and construction yards. As part of the Nogales Street Grade Separation Project, Gale Avenue is being widened by between 16 and 18 feet (eight to nine feet on each side) to create a four-lane road for a distance of 0.36 miles west of its intersection with Nogales Street, including the Project Site frontage. The dedication of Project Site frontage along Gale Avenue would permanently reduce the Project Site's net lot area.

The Project Site would remain in the hands of the present owner and no new development would be constructed on the Project Site until such time as a new purchase or lease offer was submitted to the owner and a new development proposal approved by the County. The Project Site has been vacant since at least 2008, and the timing and nature of its future development is speculative and would require a number of years to be realized. No development could take place on the Project Site until completion of the Nogales Street Grade Separation Project in summer 2016, followed by removal of ACE improvements on the Project Site. Accordingly, this Alternative evaluates the likely near-term (five-year) disposition of the Project Site in the absence of Project approval.

Under this Alternative, the Project Site would remain the last vacant and undeveloped parcel in the Project vicinity, surrounded by commercial and light industrial uses within the unincorporated Los Angeles County community of Rowland Heights and the City of Industry. Related Project amenities on the Site, such as pedestrian connections between the Project Site and adjacent properties, a sidewalk and landscaped setback along Gale Avenue, on-site landscaping, and on-site common areas with seating, landscaping, and historically-themed amenities, would not be developed. The existing on-site storm drain on the northerly portion of the Project Site would remain partially channelized above ground where it traverses the Project Site, with continued periodic clearing by the County of Los Angeles and City of Industry Public Works Departments to maintain storm flow capacity.

Because no development would be implemented in the near term, the Project's requested entitlements would not be sought. Neither a Tentative Tract Map subdividing the portion of the Project Site within the unincorporated County nor a Zone Change for the proposed hotel parcels would be sought. The portion of the Project Site within the unincorporated County would remain as a single 14.06-acre parcel with underlying zoning of M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion). Because it is part of

the Project Site parcel, the contiguous 0.79-acre portion of the Site within the City of Industry that is zoned M (Industrial) would also remain unchanged (undeveloped) following the removal of ACE improvements.

B. ENVIRONMENTAL IMPACTS

1. Aesthetics

No on-site development would occur under the No Project/No Build Alternative. Once the temporary improvements associated with the Nogales Street Grade Separation Project are removed, the Project Site would be characterized by areas of limited topography, dirt roads, former (unpaved) ACE roadway alignments and construction yards, and ruderal vegetation, as well as the partially channelized storm drain. As this Alternative would leave the Project Site in an undeveloped condition, it would result in no impacts to visual character, views, light and glare, or shading, although the Project Site would be out of character with the developed nature of the surrounding area. In comparison, the Project was determined in Section 4.A, Aesthetics, of this Draft EIR to result in less than significant aesthetic impacts, which would be avoided under this Alternative. As a result, aesthetic impacts under the No Project/No Build Alternative would be less than under the Project.

2. Air Quality

Under the No Project/No Build Alternative, no construction would occur and no development would result. This Alternative would not increase the number of employees, guest, or patrons on the Project Site or result in additional vehicle trips. Therefore, construction and operation of the No Project/No Build Alternative would not increase air emissions, and no impacts related to applicable plans and policies, violation of air quality standards, nonattainment pollutants, or substantial pollutant concentrations would occur.

Project construction was determined to result in a less than significant impact with regard to violation of air quality standards. However, Project operation was determined to result in a significant impact related to the violation of air quality standards, as maximum daily mass emissions would exceed of the regional thresholds of significance for volatile organic compounds (VOCs) and nitrogen oxides (NO_x). Because the No Project/No Build Alternative would not introduce construction or operational sources of air pollutants, impacts under this Alternative would be less than those of the Project, and this Alternative would avoid the Project's significant and unavoidable operational air quality impact.

3. Biological Resources

Under the No Project/No Build Alternative, no grading, excavation, or other landform alteration would take place on the Project Site. The Project Site would be characterized by limited topography and ruderal vegetation, dirt roads, and graded areas along the former ACE roadway alignments and construction yards. The existing on-site storm drain at the northerly end of the Site would remain partially channelized and unimproved, with occasional clearance to maintain storm flow capacity. Therefore, the No Project/No Build Alternative would result in no impacts to special status species, sensitive plant communities, jurisdictional resources, wildlife movement, or oak woodlands or unique native trees.

Project construction was determined to result in less than significant impacts, with mitigation, to existing on-site wetlands and jurisdictional waters of the U.S., California Department of Fish and Wildlife (CDFW)

jurisdictional streambed and associated riparian habitat, and nesting birds during general avian nesting season, with impacts related to all other biological resources determined to be less than significant. As the No Project/No Build Alternative would not alter conditions on the Project Site as they pertain to biological resources, impacts to biological resources under this Alternative would be less than those of the Project.

4. Cultural Resources

a. Archaeological Resources

Under the No Project/No Build Alternative, no grading or excavation would take place, and no potentially unknown archaeological resources present on the Project Site would be disturbed.

While potential exists for the presence of archaeological resources to occur on the Project Site, based on the nearby location of two recorded sites with built and prehistoric resources, Project construction was determined to result in less than significant impacts after mitigation requiring construction monitoring and implementation of a removal and treatment plan in the event of the discovery of significant resources during earthmoving activities on-site. Impacts to archaeological resources under this Alternative would, therefore, be less than those of the Project.

b. Paleontological Resources

Under the No Project/No Build Alternative, no grading or excavation would take place, and no potentially unknown paleontological resources present on the Project Site would be disturbed.

While potential exists on the Project Site for the presence of paleontological resources to occur on the Project Site, based on the presence on-site of the Puente Formation rock unit known to have yielded fossils approximately one mile away, construction was determined to result in less than significant impacts, with mitigation, to any unknown fossil resources disturbed during earthmoving activities. Impacts to fossil resources under this Alternative would, therefore, be less than those of the Project.

5. Geology and Soils

Under the No Project/No Build Alternative, no buildings would be constructed and no employees, guests, or visitors would be introduced onto the Project Site. Because no development would occur, there would be no potential for impacts associated with geologic hazards or soil characteristics. In comparison, the Project was determined to result in less than significant impacts associated with fault rupture, ground shaking/seismicity, differential settlement, cut and fill stability, liquefaction, and expansive soils with the implementation of the recommendations of the Geotechnical Report and Updated Geotechnical Report. Impacts under the No Project/No Build Alternative would be less than those of the Project.

6. Greenhouse Gas Emissions

No construction or commercial or other operations would take place on the Project Site under the No Project/No Build Alternative, and no construction or operational greenhouse gas (GHG) emissions would be generated. In comparison, Project-related GHG emissions would be generated during construction and operation, but would be less than the "Business as Usual" scenario, and impacts were therefore determined

to be less than significant. Nonetheless, impacts under the No Project/No Build would be less than those of the Project.

7. Hydrology and Water Quality

Under the No Project/No Build Alternative, no development would occur on site, and the existing on-site storm drain would remain partially channelized and above ground. Stormwater runoff would continue to sheet flow across the Project Site, as under current and pre-ACE improvement conditions, into the partially channelized on-site storm drain and into Gale Avenue. Therefore, the No Project/No Build Alternative would have a less than significant impact to water quality, drainage patterns, and stormwater drainage systems, although runoff would continue to be largely uncontrolled and would result in at least some sedimentation through sheet flows across undeveloped and exposed soils.

Project construction was determined to result in a less than significant impact to hydrology and water quality through implementation of best management practices (BMPs) required in accordance with the Standard Stormwater Pollutant Prevention Plan (SWPPP); such BMPs would control storm water flows and limit sedimentation on the Project Site. Similarly, Project operation would result in a less than significant impact to hydrology and water quality through implementation of a County-approved stormwater management system, which would maintain permitted flow volumes and implement structural BMPs in accordance with County Low-Impact Development (LID) requirements. These requirements would serve to control runoff and treat first flush rainfall on site before discharging to off-site municipal infrastructure. Nonetheless, because the No Project/No Build Alternative would not develop the Site, and the Site's redevelopment would necessitate compliance with regulatory requirements that would serve to reduce runoff volumes, control water quality, and underground the existing partially channelized storm drain, impacts under the No Project/No Build Alternative would be greater than those of the Project.

8. Land Use and Planning

Under the No Project/No Build Alternative, no Zone Change from M-1.5-BE to C3 for the proposed hotel parcels would be sought, and no Tentative Tract Map for proposed land division or Conditional Use Permits (CUPs) for the proposed commercial operations would be sought. Therefore, this Alternative would have no impact with respect to compliance with applicable County and other regional plans and policies governing land use, or with the Los Angeles County Code (LACC) or Rowland Heights Community Standards District (CSD) development standards applicable to the Project Site. The Project was determined to be substantially compliant with all related land use plans and policies, with the exception of the requested Zone Change for the hotel parcels and Parking Permit for the proposed shared parking, program. CUPs would also be sought for, among other actions, hotel height limit exceedance and alcohol sales. With County approval of these discretionary entitlements, Project land use impacts would be less than significant. Nonetheless, this Alternative would not require any discretionary approvals. As a result, impacts under the No Project/No Build Alternative would be less than those of the Project.

9. Noise

The No Project/No Build Alternative would not introduce construction or operational noise sources onto the Project Site or vicinity. Therefore, this Alternative would result in no construction or operational noise impacts. In comparison, Project construction was determined to result in a less than significant construction noise impact on the existing hotel on the south side of Gale Avenue, after mitigation, and Project-related off-

site construction activities (hauling, equipment delivery) would also be less than significant. Project-generated operational noise impacts on off-site noise-sensitive land uses due to on-site activities (e.g., use of open space, parking lots, car alarms, etc.) and off-site activities (Project traffic) were also determined to be less than significant. Nonetheless, since the No Project/No Build Alternative would not introduce any noise sources, impacts under this Alternative would be less than those of the Project.

10. Fire Protection and Emergency Services

Under the No Project/No Build Alternative, no construction would take place and no development would occur. Thus, no additional employees, guests, or visitors would be introduced to the Project Site, and this Alternative would have no impact on fire protection and emergency services. In comparison, the Project would result in a less than significant impact on fire protection and emergency services. As a result, impacts under the No Project/No Build Alternative would be less than those of the Project.

11. Sheriff Protection

Under the No Project/No Build Alternative, no construction would take place and no development would occur. Thus, no additional employees, guests, or visitors would be introduced to the Project Site, and this Alternative would result in no impact to Los Angeles Sheriff's Department (LASD) services. In comparison, the Project would have a less than significant impact on Sheriff protection services. As a result, impacts under the No Project/No Build Alternative would be less than those of the Project.

12. Transportation and Parking

Under the No Project/No Build Alternative, no development would occur and no additional traffic trips would be generated by the Project Site. ACE would remove the temporary New Charlie Road detour through the Project Site, and north-south traffic would return to Nogales Street. ACE would also complete its scheduled improvements to the Nogales Street/Gale Avenue intersection, and Gale Avenue would be widened by between 16 and 18 feet (eight to nine feet on each side) to create a four-lane road for a distance of 0.36 miles west of the intersection, including along the Project Site frontage. As discussed in Section 4.K, Transportation and Parking, three related projects would continue to add vehicle trips to study area intersections. However, the No Project/No Build Alternative would not result in construction activities in the Project vicinity or contribute vehicle trips to the area roadway infrastructure, and there would be no impact to area intersections, the County's Congestion Management Plan (CMP) facilities, or the creation of traffic hazards or impacts on emergency access. Furthermore, this Alternative would not increase parking demand on the Project Site.

In comparison, Project construction would result in less than significant impacts to study area intersections with the implementation of Project Design Feature PDF-TRAF-1, which would implement a Construction Staging and Traffic Management Plan during construction. The Project's operational impacts on intersections under the Future (2020) With Project Plus Cumulative Traffic conditions were determined to be significant and unavoidable at Intersections No. 4 (Fullerton Road & Colima Road) and No. 18 (Nogales Street & Colima Road) even with implementation of Mitigation Measure MM-TRAF-1, which requires the Project Applicant to pay a fair-share contribution towards identified physical improvements. The Project's construction and operational impacts to the County's CMP, traffic hazards, emergency access, and plan and policy consistency (parking) were determined to be less than significant. As a result, impacts under the No

Project/No Build Alternative would be less than those of the Project, and this Alternative would avoid the Project's two significant and unavoidable intersection impacts.

13. Wastewater

The No Project/No Build Alternative would not introduce new development to the Project Site and therefore would not increase wastewater generation. Therefore, the No Project/No Build Alternative would have no impact on wastewater conveyance or treatment infrastructure. In comparison, the Project would result in a less than significant impact on wastewater conveyance and treatment infrastructure because the local wastewater conveyance system and San Jose Creek Water Reclamation Plant (WRP) have adequate capacity to accommodate Project wastewater flows. Impacts under the No Project/No Build Alternative would be less than those of the Project.

14. Water Supply

The No Project/No Build Alternative would not introduce development to the Project Site, and thus would not increase water demand or the need for water conveyance on the Project Site or surrounding vicinity. Therefore, this Alternative would have no impact on water infrastructure or water supply. As the Project was determined to result in less than significant impacts to water supply and infrastructure, impacts under the No Project/No Build Alternative would be less than those of the Project.

C. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The ability of the No Project/No Development Alternative to achieve the underlying Project purpose and specific Project Objectives, presented in Chapter 2.0, Project Description, of this Draft EIR, is summarized in Subsection 5.E, below. As shown, because the No Project/No Build Alternative would preclude any new development on the Project Site, it would not achieve the underlying Project purpose or primary objectives or any of the 18 specific Project Objectives.

D. CONCLUSION

Although the No Project/No Build Alternative would avoid the Project's unavoidable significant impacts as well as its significant but mitigable impacts, it would preclude any of the development proposed under the Project, and consequently would not achieve the Project's underlying purpose and primary objective or any of the 18 specific Project Objectives. For this reason, it is not considered a feasible alternative.

5.0 ALTERNATIVES

B. ALTERNATIVE 2: REDUCED INTENSITY ALTERNATIVE

A. DESCRIPTION OF THE ALTERNATIVE

The Reduced Intensity Alternative would result in development of the Project Site with land uses similar to those of the Project, except that the high-turnover (sit-down) restaurant use would be omitted altogether, and the floor area for all other commercial uses on Parcel 1 and the hotel room count on Parcels 2 and 3 would be reduced by 20 percent. In addition, Hotel B on Parcel 3 would be reconfigured as an all-suites hotel. This alternative would provide a total of 432 guestrooms (compared to 477 guestrooms under the Project) and net floor area of 341,316 square feet (compared to 446,700 square feet under the Project, representing a reduction of approximately 23 percent).

Parcel 1 would still be developed with a Commercial Center with four commercial buildings housing retail, restaurant, and office uses, with a spatial arrangement and building footprints similar to those of the Project. However, the net retail floor area would be 66,966 square feet (a reduction of approximately 16,741 square feet, or 20 percent, compared to the Project's 83,707 square feet). The quality restaurant floor area would be 16,046 square feet (a reduction of 4,011 square feet, or 20 percent, compared to the Project's 20,057 square feet). The office floor area would be 1,600 square feet (a reduction of 4,011 square feet, or 20 percent, compared to the Project's 20,057 square feet). As noted, the high-turnover restaurant square footage (20,056 square feet) would be omitted altogether. In total, Parcel 1 would be developed with approximately 84,612 square feet of net floor area, yielding a FAR of 0.237:1 (compared to a FAR of 0.365:1 under the Project). Lot coverage would be unchanged at approximately 26.6 percent.

Parcel 2 would be developed as under the Project, except that the floor area and room count for the full service Hotel A would be reduced by 20 percent. As a result, Hotel A would provide 151,960 square feet of floor area (a reduction of 37,900 square feet when compared to the Project's 189,950 square feet) and 220 guestrooms and suites (a reduction of 55 rooms when compared to the Project's 275 guestrooms and suites). Hotel A's ballrooms/banquet rooms, meeting rooms, a restaurant, bar, business center, and fitness center, and outdoor pool and barbecue area would remain unchanged in terms of square footage. Hotel restaurant hours of operation would continue to be from 6:00 A.M. to 10:00 P.M., while the bar would operate from 12:00 P.M. to 12:00 A.M. Banquet and meeting room hours of operation would extend to 12:00 A.M. The height of Hotel A would be reduced by one floor to five stories and by 12 feet to approximately 60 feet in height above grade (to top of parapet), with rooftop mechanical equipment up to 68 feet above grade.

Parcel 3 would be developed as under the Project, except that except that the floor area and room count for the extended stay hotel would be reduced by 20 percent. In addition, hotel accommodations would be limited to two-bedroom suites; no standard guestrooms would be provided. As a result, Hotel B would provide 104,744 square feet of floor area (a reduction of 26,186 square feet when compared to the Project's 130,930 square feet) and 162 suites (where the Project proposed 70 suites and 132 guestrooms), with each suite providing a sitting area, separate bedroom, and fully equipped kitchenettes. Common area amenities would continue to include a breakfast lounge, meeting rooms with hours of operation from 9:00 A.M. to 10:00 P.M., and a fitness center. The height of Hotel B would be reduced by one floor to five stories and by 12 feet to approximately 60 feet in height above grade (to top of parapet), with rooftop mechanical equipment up to 68 feet above grade.

The portion of the Project Site within the City of Industry would continue to accommodate up to 75 surface parking stalls to serve the Commercial Center and hotel uses, as under the Project.

The LACC parking requirement for this Alternative would be 1,114 parking spaces⁹, a reduction of 383 spaces or approximately 25 percent from the Project parking requirement of 1,503 spaces. However, it is assumed the Reduced Intensity Alternative would include a shared parking program as under the Project since the proposed uses would have noncoincidental peak parking demand as under the Project. Similar to the Project, the restaurant floor plans for Parcel 1 are not available at this time, and the Project's proposed Project Design Feature/Condition of Approval related to limiting parking supply on Parcel 1 would also be applicable to the Reduced Intensity Alternative.

Access roadways and internal pedestrian circulation would be developed as proposed under the Project. Pedestrian walkways would continue to connect buildings within the Project Site and with off-site commercial uses; sidewalk improvements, a landscaped setback, and ADA access would continue to be provided along Gale Avenue. Amenities would still include a centrally located gathering common area that includes seating, a water feature, and landscaping, and a historically themed common area.

Entitlements requested under the Reduced Intensity Alternative would be unchanged compared to the Project. A Zone Change from M-1.5 to C-3-(DP) would continue to be requested for Parcels 2 and 3 to permit the development of a full service hotel on Parcel 2 and a hotel intended for extended stay guests on Parcel 3. A Development Program (DP) CUP would continue to be requested for to allow structures to exceed a maximum height of 45 feet on Parcels 2 and 3 (LACC 22.40.040 and 22.44.132.D.4.b). All requested entitlements for Parcel 1, including the CUP to authorize a commercial shopping center containing more than three business establishments, would be the same as under the Project. A Vesting Tentative Parcel Map would be necessary to subdivide the portion of the Project Site within the unincorporated County into three parcels, including commercial condominiums units (albeit fewer units) within Parcel 1. A Parking Permit would be sought for shared parking and valet parking. A Drainage Concept Review would continue to be required to underground the on-site storm drain, as would permits from the U.S. Army Corps of Engineers (USACE), CDFW, and Regional Water Quality Control Board (RWQCB).

B. ENVIRONMENTAL IMPACTS

1. Aesthetics

a. Visual Character

During construction, the demolition, grading, and construction of new buildings, sidewalk improvements, and installation of landscaping would be visually disruptive while these activities occur. However, because of the relatively short-term nature of construction, the use of construction fencing which would partially screen construction activities, and the lack of visual resources on the Site and in the surrounding area, construction activities under the Reduced Intensity Alternative would result in a less than significant impact on the existing visual character of the Project Site. Similarly, construction of the Project was determined to

⁹ LACC requires 268 spaces for the proposed commercial retail uses (4/1,000 sf), 4 spaces for the proposed general office uses (2.5/1,000 sf), 208 spaces for the restaurant ($[16,046 \text{ sf} * 55\%]/15/3$ and $[16,046 \text{ sf} * 45\%]/200/3$), 272 spaces for the two hotels (0.5 * 220 standard rooms for Hotel A; 1.0 * 162 suites for Hotel B), and 266 spaces for Hotel A meeting rooms (12,000 sf/15/3), and 96 spaces for the Hotel A restaurant (3,600 sf/15/3), bar (600 sf/15/3), and kitchen (1,800 sf/200/3).

result in a less than significant impact on visual character due to the limited duration of construction and the use of screening. As a result, impacts under this Alternative would be similar to the Project.

The three parcels would be developed in a manner similar to that of the Project. The Commercial Center would have the same general site plan, including building layout, open space, landscaping, and parking, although less subterranean parking may be required. The one-floor reduction in the height of the proposed hotels would reduce the buildings' potential contrast with the substantially low-rise area and increase the compatibility of the buildings with the adjacent two-story buildings of the Concourse Business Park. However, this impact was concluded to be less than significant under the Project with applicable setbacks. Landscaped setbacks, other on-site landscaping, and pedestrian amenities on all three parcels, including along the Project Site's Gale Avenue, would remain unchanged compared to the Project.

The Project was determined to result in a less than significant impact on visual character, with the introduction of architecturally interesting buildings and landscaping to the Project Site, and also determined to have less than significant impacts on valued views in the Project area, even with the requested hotel building height increase. Since the Reduced Intensity would reduce the height of the proposed buildings in a substantially low-rise area, visual character impacts under the Reduced Intensity Alternative would be less than under the Project.

b. Light and Glare

Sources of nighttime lighting and glare under the Reduced Intensity Alternative would be largely identical to those of the Project, although the elimination of one floor on each hotel building and the square footage for high-turnover restaurant uses, and the small reduction in the floor area for other commercial uses, would reduce building sizes and the number of commercial condominium units, and correspondingly reduce the amount of lighting necessary. The reduced trip generation for this Alternative would also reduce the amount of nighttime mobile sources of lighting, with fewer cars accessing the Site.

The Project's new commercial signage, parking lot lights, and light spillage from windows were not considered to be a substantive source of new lighting given the adjacent industrial and commercial uses, which, in combination with area roadways and billboards/signage, contribute to already relatively high ambient light levels at night, and impacts were determined to be less than significant. The Project was also determined to result in a less than significant glare impact because building materials were unlikely to cause any kind of glare impact. As a result of the alternative's reduced development program, light and glare impacts under the Reduced Intensity Alternative would be less than under the Project.

c. Shading

The hotel buildings would be reduced by one floor under the Reduced Intensity Alternative, and thus shading impacts on off-site uses would be reduced when compared to the Project. Shade/shadow modeling completed for the Project determined that Project buildings would not shade any off-site shade-sensitive recreational or multifamily residential uses in any season, and impacts would be less than significant. Impacts under this Alternative would be less than those of the Project.

2. Air Quality

a. Consistency of the Project With Applicable Plans and Policies

As with the Project, construction jobs under the Reduced Intensity Alternative would be relatively few and temporary in nature, and would not conflict with long-term employment projections upon which the Air Quality Management Plan (AQMP) is based. In addition, construction of this Alternative would not conflict with implementation of strategies to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. Construction of the Reduced Intensity Alternative would also be required to comply with South Coast Air Quality Management District (SCAQMD) regulations for controlling fugitive dust pursuant to SCAQMD Rule 403. As a result, the Reduced Intensity Alternative would be consistent with applicable plans and policies.

Similarly, construction of the Project was determined to result in a less than significant impact because it would not conflict with long-term employment projections, would not interfere with plans to replace older construction equipment, and would comply with applicable SCAQMD regulations. Construction activities under this Alternative would be reduced in scale compared to the Project. However, since only the duration of construction activities would decrease compared to the Project, and not the daily intensity, pollutant emissions and fugitive dust from site preparation and construction activities would be similar to those of the Project on a daily basis. Since regional construction air quality impacts are evaluated on a worst-case (maximum) day, impacts would be similar to those of the Project.

With regard to operation, the Project was determined to result in a less than significant AQMP consistency impact with respect to emissions due to limitations imposed on the development of the Commercial Center and the relatively small size of the two hotels, the Project Site as a whole would generate lower trip-related emissions than if the Project Site were developed with the maximum permitted development intensity of commercial uses under current zoning. Moreover, trip generation and emissions would be consistent with the growth projections as contained in the County and City of Industry's General Plans, and thus in the AQMP, following approval of the requested Zone Change for Parcels 2 and 3. Further, the Project would be consistent with Transportation Control Measures that are intended to reduce regional mobile source emissions by reducing vehicle trips for patrons and employees and increasing the concentration of commercial development near public transit. Because the Reduced Intensity Alternative would represent a reduction in the amount of development proposed compared to the Project and would be located an equal distance to transit options, impacts under the Reduced Intensity Alternative would be less than under the Project.

b. Violation of Air Quality Standards

Although the Reduced Intensity Alternative would result in less development on site, it is anticipated to result in construction which, on the most intensive day of activity, is expected to be the same as the Project, even though the amount of Site preparation and building construction would be somewhat less and the construction duration reduced under this Alternative compared to the proposed Project. Accordingly, pollutant emissions and fugitive dust from Site preparation and construction activities would be similar on a daily basis to those of the Project, but would be less than those of the Project over the course of the entire construction period. Localized pollutant construction impacts would also be substantially similar to those of

the Project since both the intensity and duration of excavation and grading would be similar, and both would be less than significant.

Project operational emissions were determined to exceed the applicable mass thresholds of significance for VOC and NO_x during full buildout and interim operations (overlap of Phase 1 development in combination with ongoing construction emissions from Phase 2 construction). As a result, operation of the Project was determined to potentially result in emissions that lead to a violation of an air quality standard or contribute substantially to an existing or projected air quality violation, resulting in unavoidable significant operational air quality impacts for VOCs and NO_x. Because of the reduction in vehicle trips and vehicle miles traveled under the Reduced Intensity Alternative, operational emissions of criteria pollutants under this Alternative would be reduced in comparison to the Project. As shown in Appendix K-1, Air Quality, Greenhouse Gas Emission, and Noise Data Worksheets, VOC and NO_x would be 38 and 50 lbs/day, respectively, reductions of 32 percent and 34 percent, respectively, compared to the Project. These daily emission levels are less than the applicable SCAQMD mass emission thresholds and therefore the Reduced Intensity Alternative would result in less than significant operational impacts. Operational air quality emission impacts under this Alternative would therefore be less than those of the Project, and this Alternative would avoid the Project's significant unavoidable operational air quality impacts.

c. Nonattainment Pollutants

The Los Angeles County portion of the Air Basin is designated nonattainment for the ozone and fine particulate matter (PM_{2.5}) National Ambient Air Quality Standards (NAAQS) and nonattainment for the ozone, nitrogen dioxide (NO₂), respirable particulate matter (PM₁₀), and PM_{2.5} California Ambient Air Quality Standards (CAAQS). Construction of the Project was determined to result in a less than significant impact because Project would occur in accordance with California Air Resources Board (CARB) and SCAQMD control measures so that construction emissions from the Project would not exceed SCAQMD significance thresholds. As discussed above, construction of the Reduced Intensity Alternative would result in lower overall emissions, but on a daily basis, emissions would be similar to the Project. Therefore, as with the Project, construction of the Reduced Intensity Alternative would result in a less than significant impact.

Project operations would exceed the threshold of significance for VOC and NO_x during interim operations when combined with ongoing construction emissions as well as full buildout. Even with the implementation of Project Design Features to meet the requirements of Leadership in Energy and Environmental Design (LEED®) Silver certification or the equivalent, per the County's Green Building Ordinance, long-term operational impacts would remain because the majority of emissions associated with the operation of the Project are from vehicles accessing the Project Site. The Reduced Intensity Alternative would result in fewer vehicle trips, which would also reduce operational emissions to levels below significance thresholds. As a result, impacts under the Reduced Intensity Alternative would be less than significant, and would therefore avoid the Project's significant and unavoidable impact.

d. Substantial Pollutant Concentrations

When determining localized air quality impacts under the Reduced Intensity Alternative, it is useful to compare them to the Project since the Project provides a baseline of known impacts. As shown in **Table 4.B-7, Maximum Unmitigated Localized Construction Emissions**, and **Table 4.B-8, Maximum Unmitigated Localized Operational Emissions – Interim and Build**, in Section 4.B, Air Quality, of this Draft EIR, Project construction and operations were determined to result in a less than significant localized impact related to substantial

pollutant concentrations, even when considering the interim construction of Phase 2 while Phase 1 is operational, because they would not generate emissions that exceed allowable localized thresholds for these pollutants. As the Reduced Intensity Alternative represents a reduced construction schedule and overall program of development when compared to the Project, impacts under this Alternative would be less than significant. However, as discussed above, construction activities and emissions on a daily basis under this Alternative would be similar to the Project.

The Project was determined to result in a less than significant impact to carbon monoxide (CO) hotspots at study area intersections. Baseline CO levels in the Project area were found to be substantially below the federal and State standards. The Project would not cause or contribute to the formation of CO hotspots, and CO concentrations at Project-impacted intersections would remain well below the ambient air quality standards. The Reduced Intensity Alternative would result in fewer peak hour trips, which would mean lower CO concentrations at Project impacted intersections. Therefore, as the Reduced Intensity Alternative represents a reduced peak hour trip generation and overall program of development when compared to the Project, impacts under this Alternative would be less than significant and less than under the Project.

Typical sources of acutely and chronically hazardous toxic air contaminants (TAC) include industrial manufacturing processes, automotive repair facilities, and dry cleaning facilities. Although the Reduced Intensity Alternative does not propose these types of uses, it would nonetheless generate diesel particulate matter and VOCs during construction and operation. It was determined that the Project would result in a less than significant impact with regard to TACs because it would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and would utilize incidental amounts of toxic substances such as oils, solvents, and paints in accordance with applicable SCAQMD rules for their manufacture and use. As the Reduced Intensity Alternative represents a reduction in the overall construction and development program, it would emit a reduced quantity of TACs. Therefore, construction and operational impacts to TACs would be less than significant and less than under the Project.

e. Odors

As under the Project, the Reduced Intensity Alternative would not introduce land uses associated with odor complaints or generate substantial odorous emissions. Construction equipment would comply with CARB anti-idling regulations to minimize diesel emissions. Architectural coatings would comply with CARB and SCAQMD regulations regarding VOC content. During operations, food would be prepared in indoor kitchen areas, and refuse would be maintained and disposed of in accordance with applicable regulations. As a result, the Reduced Intensity Alternative would not create objectionable odors affecting a substantial number of people, and impacts would be less than significant.

The Project was determined to result in less than significant operational impacts with regard to odors because it would not introduce land uses associated with odor complaints, would allow only indoor cooking, and would use compliant architectural coatings. However, because the Reduced Intensity Alternative would eliminate the Project's high-turnover restaurant uses and the corresponding kitchens and refuse collection areas, impacts under this Alternative would be less than those of the Project.

3. Biological Resources

a. Special Status Species

The Reduced Intensity Alternative would underground the existing on-site channel and require the removal of the single southern California black walnut (California Native Plant Society [CNPS] Rank 4) within the channel. However, the tree's assigned CNPS Rank 4 represents low-level watch list sensitivity, and the removal of one specimen from a highly disturbed location would not be considered an adverse effect to the species. Therefore, the Reduced Intensity Alternative would result in a less than significant impact to special status species.

Similarly, the Project would underground the existing channel, which was determined to result in a less than significant impact to special status species because the removal of a single California black walnut from a highly disturbed location would not be considered an adverse effect to the species. Impacts under this Alternative would be similar to those of the Project.

b. Sensitive Plant Communities

The Reduced Intensity Alternative would result in a site plan and building layout comparable to that of the Project. This alternative would, therefore, likewise result in the removal of on-site vegetation. The removal of existing on-site vegetation under the Project, including the willow community in the existing channel, was determined to result in a less-than- significant impact to sensitive plant communities. Impacts under the Reduced Intensity Alternative would therefore be similar to the Project.

c. Jurisdictional Resources

The Reduced Intensity Alternative proposes a site plan and spatial building arrangement comparable to that proposed under the Project. This alternative would underground the existing partially channelized on-site drainage. This is considered a potentially significant impact to jurisdictional waters of the U.S. and CDFW jurisdictional streambed and associated riparian habitat because undergrounding the channel would result in the loss of these resources. Additionally, a small patch of cattails, located within the downstream portion of the existing drainage and considered a federally protected wetland, would be removed. As a consequence of constructing a new storm drain segment, the Project Site drainage would no longer support vegetation, including cattails. The Reduced Intensity Alternative would be required to implement Project Mitigation Measure MM-BIO-1, which requires the Project Applicant to obtain a Clean Water Act (CWA) Section 404 permit from the USACE, a CWA Section 401 permit from the RWQCB, and Streambed Alteration Agreement permit under Section 1602 of the California Fish and Game Code from the CDFW prior to the issuance of any grading permits. Issuance of these permits may include on- or off-site restoration or enhancement of USACE/RWQCB jurisdictional "waters of the U.S.,"/"waters of the State" and wetlands at a ratio no less than 1:1 for permanent impacts, as well as on- or off-site restoration or enhancement of CDFW jurisdictional streambed and associated riparian habitat at a ratio no less than 1:1 for permanent impacts. Implementation of Project Mitigation Measure MM-BIO-1 would reduce impacts to jurisdictional resources to a less than significant level.

Similarly, the Project would underground the existing channel, which would no longer support vegetation, including cattails. The implementation of Project Mitigation Measure MM-BIO-1 was determined to reduce impacts to a less than significant level. Since the Reduced Intensity Alternative would underground the

existing channel in a manner equivalent to that of the Project and would be required to implement Project Mitigation Measure MM-BIO-1, impacts under this Alternative would be similar to the Project.

d. Wildlife Movement

The Reduced Intensity Alternative proposes a site plan and building layout similar to that of the Project. Project implementation would remove existing on-site vegetation, including small trees, shrubs, and ground cover that have the potential to support nesting birds, which was determined to be a potentially significant Project impact. Mitigation requiring the Project Applicant to demonstrate to the satisfaction of the County that construction would occur outside the breeding season, or that nests are identified and appropriately avoided, is required for the Project and would reduce impacts to a less than significant level. This mitigation measure would likewise be applicable to this Alternative. After mitigation, impacts to wildlife movement under this Alternative would be less than significant and similar to those of the Project.

e. Oak Woodlands or Unique Native Trees

The Reduced Intensity Alternative would have no impacts on oak woodlands since no oak trees are present on the Project Site. However, this Alternative would result in the removal of one unique native tree, the southern California black walnut. Similar to the Project, the removal of one specimen of a unique native tree from a highly disturbed location would be a less than significant impact. Therefore, impacts on unique native trees under the Reduced Intensity Alternative would be less than significant and similar to those of the Project.

4. Cultural Resources

a. Archaeological Resources

The Reduced Intensity Alternative would slightly reduce the required amount of excavation compared to the Project since it would reduce restaurant and retail square footage and could reduce the amount of underground parking structure area. However, construction would still result in the potential to uncover previously unknown archaeological resources on the Project Site, as the sensitivity of the Site, based on the nearby location of other recorded sites, would remain unchanged. Project construction was determined to result in less than significant impacts on archaeological resources, after mitigation. Impacts on archaeological resources under this Alternative would be similar to those of the Project; Project Mitigation Measures MM-ARCHAEO-1 through MM-ARCHAEO-4, which require construction monitoring and implementation of a recovery and treatment plan in the event archaeological resources or human remains are disturbed during earthmoving activities on-site, would be applicable to this Alternative.

b. Paleontological Resources

As noted for archaeological resources, the Reduced Intensity Alternative would slightly reduce the required amount of excavation compared to the Project. However, construction would still result in the potential to uncover previously unknown paleontological resources on the Project Site, as the sensitivity of the Site, based on the presence of the Puente Formation rock unit formation, would remain unchanged. Project construction was determined to result in less than significant impacts on paleontological resources, after mitigation requiring construction monitoring and implementation of a removal and treatment plan in the event of the discovery of significant resources. Impacts on paleontological resources under this Alternative would be similar to those of the Project; Mitigation Measures MM-PALEO- through MM-PALEO-4, which

require construction monitoring and implementation of a recovery and treatment plan in the event significant paleontological resources are uncovered during earthmoving activities on-site, would be applicable to this Alternative.

5. Geology

a. Geologic Hazard Effects

The Reduced Intensity Alternative proposes a site plan and building layout comparable to that of the Project. The alternative would also provide the uses similar to those proposed under the Project. The hotel buildings would be reduced in height by one floor to five stories, and by 12 feet to 60 feet above grade, with rooftop mechanical equipment up to 68 feet above grade. This alternative also proposes a reduction in developed floor area in the Parcel 1 Commercial Center. The Project Site is not located within a State-designated Alquist-Priolo Earthquake Fault Zone, and there would be no potential for on-site fault rupture. The Project Site would continue to be subject to periodic ground shaking and partially underlain by liquefiable soils that are classified as Site Class F for design purposes and could potentially result in dynamic settlement during a seismic event. To address Site F soil conditions, building design would be required by the LACC and County Plan approval process to effectively implement Project Design Features similar to the Project. Implementation of the specific engineering recommendation contained within a Site-specific Geotechnical Report approved by the LACDPW prior to issuance of a grading permit would be required, as under the Project.

Similarly, the Project would result in less than significant impacts associated with fault rupture, ground shaking and seismicity, liquefaction, differential settlement, and cut and fill stability with the implementation of Project Design Features that propose the building design is in accordance with the recommendations of a Site-specific Geotechnical Report, as approved by the LACDPW prior to the issuance of a grading permit. The same Project Design Feature would apply to this Alternative. As a result, impacts under the Reduced Intensity Alternative would be similar to the Project and less than significant.

6. Greenhouse Gas Emissions

a. Greenhouse Gas Emissions

The Reduced Intensity Alternative would generate an increase in GHG emissions during both construction and operation when compared to existing conditions. When determining GHG emission impacts under the Reduced Intensity Alternative, it is useful to compare them to the Project since the Project provides a baseline of known impacts. As presented in **Table 4.F-5, Annual Greenhouse Gas Emissions**, in Section 4.F, Greenhouse Gas Emissions, of this Draft EIR, when construction and operational GHG emissions are amortized over the life of the Project, the Project would constitute an equivalent or greater reduction from business-as-usual (BAU) than has been determined by CARB to be necessary to meet the goals of AB 32 (a reduction of at least 15.8 percent fewer GHG emissions than a comparable BAU development). GHG emissions reductions take into account both mobile sources and on-site sources. With regard to mobile sources, the percent reduction in trip generation would be similar to that of the Project, consisting of pass-by trips and internal capture due to the collocation of different land uses. Therefore, since the land use mix is unchanged, with regard to mobile sources, the percent reduction in vehicle trips under this Alternative would be similar to the Project. As the Reduced Intensity Alternative would also implement energy efficiency measures that would exceed the Title 24 Building Standards Code and co-locate uses within a quarter-mile of available public transportation, it would also be anticipated to result in a reduction of at least

15.8 percent fewer GHG emissions than a comparable BAU development. As a result and as shown in Appendix K-1, this Alternative would result in a GHG reduction of 16.7 percent reduction compared to BAU which does meet the target reduction of at least 15.8 percent. Therefore, impacts under this Alternative would be less than significant, and, as this Alternative represents a reduced development program and a corresponding reduction in generation of GHG emissions, impacts would be less than under the Project.

b. Greenhouse Gas Reduction Plans

The Reduced Intensity Alternative would generate an increase in GHG emissions when compared to existing conditions. As with the Project, this Alternative would incorporate Project Design Feature PDF-AQ-1 that would reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. The Reduced Intensity Alternative would also incorporate characteristics that would reduce transportation-related GHG emissions by locating Project-related jobs and retail, restaurant, and recreational uses near residential and commercial uses and within a quarter-mile of transit, thereby encouraging alternative forms of transportation and pedestrian activity, and would be constructed and operated in a manner consistent with LEED® Silver certification or the equivalent. With implementation of these Project Design Features, the Reduced Intensity Alternative would result in a less than significant impact. As the Project would also be consistent with applicable plans and policies to reduce GHG emissions, impacts under this Alternative would be similar to those of the Project.

7. Hydrology and Water Quality

a. Water Quality

Construction of the Reduced Intensity Alternative would involve Site preparation activities substantially similar to those of the Project, including excavation and grading, which would temporarily alter existing drainage patterns and water flows within the Project Site. The same regulatory requirements of the Project would be applicable to this Alternative, including a SWPPP identifying temporary BMPs to be implemented in accordance with CWA NPDES. All grading activities would require grading permits from the Los Angeles County Department of Public Works (LACDPW) and the City of Industry. Project construction impacts on hydrology and water quality were determined to be less than significant with regulatory compliance, and impacts under the Reduced Intensity Alternative would be similar to those of the Project.

As would the Project, the Reduced Intensity Alternative would result in development of the Project Site with buildings and other impervious surface areas that could increase the rate of flow from the Project Site and potentially introduce new pollutants to stormwater flows. The Project was determined to result in less than significant impacts on water quality with implementation of the proposed stormwater management plan and adherence to applicable regulatory requirements, including structural BMPs, in accordance with County LID requirements, which prevent the degradation of water quality leaving the Project Site. These requirements would also be applicable to the Reduced Intensity Alternative, and as a result, impacts under this Alternative would be similar to those of the Project.

b. Drainage Patterns and Stormwater Drainage System

During construction, implementation of BMPs outlined in a Site-specific SWPPP would control potential impacts from stormwater runoff. Where impervious surfaces are introduced to the Project Site, they would

occur in correlation with the proposed BMPs to maintain permitted runoff volumes. All grading activities would require grading permits from the LACDPW and City of Industry, which would monitor compliance with these requirements as part of the Project approval process. Therefore, construction of the Reduced Intensity Alternative would result in a less than significant impact to drainage patterns and the stormwater drainage system. Similarly, construction of the Project would result in less than significant impacts to drainage patterns and stormwater drainage systems with the implementation of BMPs and compliance monitoring. Construction impacts under this Alternative would be similar to the Project.

Regarding operation, the Reduced Intensity Alternative proposes a site plan and spatial building arrangement comparable to that proposed of the Project. Therefore, this Alternative would slightly reduce the volume of flow to the proposed 90-inch reinforced concrete pipe (RCP) (MTD Line No. 1000 B), with a corresponding increase in the volume of flow to Gale Avenue and the catch basin at the intersection of Coiner Ct (MTD No. 1000 Line A). However, as discussed above, structural BMPs would be incorporated into this Alternative's design to maintain permitted flow volumes from the Project Site (i.e., 2.12 cubic feet per second [CFS] per acre). County and City review and approval of the proposed stormwater drainage system would ensure on-site retention is adequate for the Reduced Intensity Alternative. Upon implementation of the approved BMPs, this Alternative's contribution to the MTD No. 1000 Line B system would be within County-permitted volumes. As a result, downstream peak flow rates would be unaffected after the confluence of MTD No. 1000 Lines A and B. Thus, the Reduced Intensity Alternative would not exceed the capacity of existing or planned stormwater drainage systems, and impact would be less than significant.

Similarly, the Project would also result in a less than significant impact, for while all on-site stormwater would continue to flow to the MTD No. 1000 storm drain system, BMPs similar to those under the Reduced Intensity Alternative would be introduced in accordance with County LID requirements to maintain permitted flow volumes even with the increase in impervious surface area. As a result, impacts under the Reduced Intensity Alternative would be similar to those under the Project.

8. Land Use and Planning

a. County Planning Documents

The Reduced Intensity Alternative would request the same entitlements as the Project and would result in the same land use relationships with adjacent and nearby land uses. Because this Alternative proposes a reduced version of the Project, including the same land use mix at a lower height and development intensity, the Reduced Intensity Alternative would be substantially consistent with policies and plans governing the Project Site, including all applicable development standards in the Rowland Heights CSD.

The Project was determined to result in less than significant land use policy compliance impacts with County approval of the discretionary entitlements sought. The Project was also determined to result in less than significant impacts related to physical compatibility despite the proposed Zone Change and building height exception because adjacent off-site buildings were not sensitive to this transition, and residential land uses are located more than 300 feet south of the Project Site across SR-60. The Reduced Intensity Alternative proposes a site plan and building layout comparable to the Project, with the same architectural materials. The reduced height of the hotel buildings would somewhat improve their compatibility with the low-rise character of the Project area and adjacent two-story commercial uses, and impacts under the Reduced Intensity Alternative would be less than under the Project.

b. Los Angeles County Code

The Reduced Intensity Alternative proposes a land use mix, as well as a site plan and building arrangements, substantially identical to those of the Project, albeit with a reduction in height and developed floor area. This alternative would require the same entitlements, including discretionary approvals related to lot subdivision, a Zone Change, CUPs, a Vesting Tentative Parcel Map, and a Parking Permit, that are sought for the Project. Following approval of the discretionary approvals, the Project would have a less than significant impact related to compliance with the LACC, and impacts under the Reduced Intensity Alternative would be similar to those of the Project.

9. Noise**a. On-Site Construction**

Under the Reduced Intensity Alternative, the duration of construction would be reduced compared to the Project. However, the intensity of construction (equipment usage) would be similar on a daily and hourly basis. Project construction was determined to result in a potentially significant noise impact at the nearby Best Western Plus Executive Inn hotel across Gale Avenue. Mitigation Measure MM-NOISE-1, which requires the construction of a temporary noise barrier at least 12 feet tall along the southern boundary of active construction site within the hotel's line-of-sight, with noise blankets capable of achieving sound level reductions of at 9 dBA, reducing Project impacts to a less than significant level. As the Reduced Intensity Alternative construction would be as intensive as that of the Project, merely for a shorter duration, this Alternative would result in construction noise levels similar to the Project, and Mitigation Measure MM-NOISE-1 would be applicable. Impacts under this Alternative would be similar to those of the Project.

b. Off-Site Project Construction Activities

The Reduced Intensity Alternative would result in similar off-site construction activities (e.g., hauling, trucking, etc.) to the Project since the same mix of land uses would be developed and earthwork quantities would only be slightly reduced because of the potential for reduction in subterranean parking structure area. Off-site Project-related construction noise impacts were found to be less than significant, and impacts under this Alternative would be similar to the Project.

c. On-Site Operation

The Reduced Intensity Alternative would reduce the number of visitors at the Project Site as the result of the elimination of high-turnover restaurant uses, reduction of the remaining commercial uses on Parcel 1 by approximately 16,741 square feet, the 20 percent reduction in hotel rooms from both hotels, and the reconfiguration of Hotel B as an all-suites hotel. This would slightly reduce on-site noise generation compared to the Project. Project operation was found to result in less than significant impacts related to on-site activities (use of open space, car alarms, etc.) and on-site equipment. Peak hourly mobile sources of Project-related noise would also decrease under this Alternative. Operational noise impacts would remain less than significant for this Alternative, and impacts would be similar to those associated with the Project.

d. Off-Site Operation Activities

The Reduced Intensity Alternative would reduce the number of visitors to the Project Site compared to the Project. In addition, the peak hour trips would also be lower, which would reduce off-site operational noise

impacts. Project operation was found to result in less than significant impacts, and off-site operational noise impacts under this Alternative would be less than those of the Project.

10. Fire Protection and Emergency Services

Construction activities associated with the Reduced Intensity Alternative may temporarily increase demand for Los Angeles County Fire Department (LACFD) fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, as is the case for the Project. However, as with the Project, adherence to applicable of State and County regulations and Code requirements would ensure that impacts on fire protection and emergency medical services would be less than significant. The Reduced Intensity Alternative would also be required to implement Project Design Feature PDF-TRAF-1, which requires a Construction Staging and Traffic Management Plan and would ensure construction activity and traffic would have a less than significant impact on emergency access in the Project vicinity. Project construction was determined to result in a less than significant impact with adherence to applicable regulations and implementation of Project Design Feature PDF-TRAF-1, and construction impacts under the Reduced Intensity Alternative would be similar to those of the Project.

During operation, the Reduced Intensity Alternative would introduce new development and increase the number of employees, hotel guests, and retail and restaurant patrons on the Project Site, thus increasing the demand for fire protection services, although to an incrementally lesser degree than the Project due to a reduction in building height; the elimination of high-turnover restaurant space; and a 20 percent reduction in quality restaurant, retail, and office space on the Parcel 1 Commercial Center; the 20 percent reduction in the number of hotel rooms on Parcels 2 and 3; and the reconfiguration of Hotel B as an all-suites hotel under this Alternative. Further, the reduced development program would result in fewer additional vehicle trips on area roadways, resulting in a corresponding reduction in the effect on emergency response times. As is the case for the Project, this Alternative would be required to meet all County fire flow requirements, install fire hydrants on the Project Site, and comply with the requirements of the Building Code, Fire Code, Utilities Code, and Subdivision Code for new construction that address structural design, building materials, site access, fire lanes, fire flow requirements, automatic sprinkler systems, alarms, and smoke detectors. Furthermore, the Project Applicant would be required to submit an Emergency Response Plan for review and approval by the LACFD. Project Design Features PDF-TRAF-1, PDF-TRAF-2, in Section 4.K, Transportation and Parking, of this Draft EIR would be applicable to the Reduced Intensity Alternative as well as the Project, to maintain emergency response time and access to the Project Site. With regulatory compliance and implementation of the Project Design Features, Project impacts on fire protection and emergency services were determined to be less than significant, and the impacts of this Alternative would be similar.

11. Sheriff Protection

During construction of the Reduced Intensity Alternative, as with Project construction, construction traffic and temporary lane closures associated with utility connections and roadway improvements could potentially affect emergency access to the Project Site and adjacent uses, as well as increase traffic on area roadways and reduce response times. However, as with the Project, the impacts of construction activities would be temporary and short-term. Project Design Feature PDF-TRAF-1, which requires a Construction Staging and Traffic Management Plan to be prepared and submitted to LADPW for review and approval prior to commencement of any construction activity, would be applicable to this Alternative.

Operation of the Reduced Intensity Alternative would be similar to the Project in that it would introduce new development onto the Project Site and increase daytime employee and patron populations and the 24-hour hotel guest population on-site. However, the reduced intensity of development, including elimination of high-turnover restaurant uses, reduction in the remaining Parcel 1 Commercial Center square footage, and 20 percent reduction in the number of hotel rooms, would reduce the employee and patron populations compared to the Project. The same security measures proposed for the Project would be implemented under this Alternative. The Reduced Intensity Alternative would be required to implement Project Design Feature PDF-TRAF-2, which requires the installation of a three-way traffic signal at the primary Project Site entrance and Gale Avenue and would help maintain adequate response times to the Project Site. The Project was determined to result in a less than significant impact to LASD services through the implementation of on-site security features and Project Design Feature PDF-TRAF-2, and impacts under this Alternative would be incrementally less than those of the Project.

12. Transportation and Parking

a. Intersections

As shown in **Table 5-1**, *Trip Generation: Reduced Intensity Alternative*, this Alternative would generate fewer trips than the Project. Specifically, the Reduced Intensity Alternative would result in 6,265 average daily trips, 268 total weekday morning peak hour trips, 528 total weekday afternoon peak hour trips, and 678 total Saturday mid-day peak hour trips. When compared to the Project, this represents a decrease of 4,092 average daily trips, including 273 total weekday morning peak hour trips, 318 total weekday afternoon peak hour trips, and 414 total Saturday mid-day peak hour trips.

As discussed in Section 4.K, Transportation and Parking, of this Draft EIR, the Project would result in potentially significant impacts at seven intersections under Future (2018) With Project Plus Cumulative Traffic conditions, including intersections Nos. 1, 3, 4, 10, 13, 15, and 18. Mitigation Measure MM-TRAF-1 would require the Project Applicant to pay a fair-share contribution to identified physical improvements at two intersections, Nos. 1 (Fullerton Road & Gale Avenue) and 3 (Fullerton Road & SR-60 Freeway Eastbound Ramps), which would reduce impacts to a less than significant level at those intersections. Improvements already under construction as part of the Nogales Street Grade Separation Project would eliminate potential Project impacts at two intersections: Nos. 13 (Nogales Street & San Jose Avenue) and 15 (Nogales Street & Gale Avenue/Walnut Drive). Project impacts would remain significant and unavoidable at three intersections: Nos. 4 (Fullerton Road & Colima Road), 10 (Nogales Street & La Puente Road), and 18 (Nogales Street & Colima Road), as these intersections are fully built out and would require right-of-way acquisition to implement improvements, which the County has determined is infeasible.

As shown in **Table 5-2**, *Alternative 2: Reduced Intensity Alternative Future (2018) With Alternative 2 Plus Cumulative Traffic Conditions Service Levels for Affected Signalized Intersections*, the reduction in hotel, retail, and restaurant floor area under the Reduced Intensity Alternative would eliminate the Project's potentially significant and unavoidable impacts at Intersection Nos. 4, 10, and 18, as well as significant Project impacts at Intersection No. 13 that will be eliminated as part of improvements related to the Nogales Grade Separation Project. This Alternative would result in potentially significant impacts at Intersection Nos. 1 and 15, as under the Project. With implementation of Mitigation Measure MM-TRAF-1, which requires a fair-share contribution to identified physical improvements at Intersection No. 1, impacts would be reduced a less than significant level at this location. Impacts under this Alternative would remain significant and

Table 5-1

**Trip Generation
Reduced Intensity Alternative**

Land Use	Size	Estimated Trip Generation ^a									
		Average Daily Trips ^a	Weekday AM Peak Hour Trips			Weekday PM Peak Hour Trips			Sat Mid-Day Peak Hour Trips		
			In	Out	Total	In	Out	Total	In	Out	Total
Shopping Center	66,966 sf	2,859	40	24	64	119	129	248	168	155	323
Quality Restaurant	16,046 Sf	1,443	7	6	13	81	40	121	102	71	173
Hotel A (Standard)	220 Rm	1,962	86	62	148	75	79	154	97	95	192
Hotel B (All Suites)	162 Rm	1,011	52	26	78	37	52	89	52	50	102
Office	1,600 sf	5	1	0	1	0	1	1	0	0	0
TOTAL VEHICLE TRIPS		7,280	186	118	304	312	301	613	419	371	790
PASS-BY (10%)		(728)	(19)	(12)	(31)	(31)	(30)	(61)	(42)	(37)	(79)
COMMERCIAL INTERNAL CAPTURE (5%)		(143)	(2)	(1)	(3)	(6)	(6)	(12)	(8)	(8)	(16)
RESTAURANT INTERNAL CAPTURE (10%)		(144)	(1)	(1)	(2)	(4)	(4)	(12)	(10)	(7)	(17)
TOTAL ALTERNATIVE TRIPS		6,265	164	104	268	267	261	528	359	319	678
TOTAL PROJECT TRIPS		10,357	312	229	541	449	397	846	566	526	1,092
DIFFERENCE		(4,092)	(148)	(125)	(273)	(182)	(136)	(318)	(207)	(207)	(414)

^a Source for trip generation rates: *Trip Generation, 9th Edition, Institute of Transportation Engineers (ITE), 2012, Land Use Categories 710,820, and 932.*

Source: Kunzman Associates, Inc., August 2015 (included in Appendix K-2, Trip Generation Worksheets, of this Draft EIR).

unavoidable at Intersection No. 15, although impacts would be eliminated by improvements underway at this location as part of the Nogales Grade Separation Project. Overall, traffic impacts under this Alternative would be less than those of the Project.

b. Congestion Management

As discussed above, the Reduced Intensity Alternative would generate fewer vehicle trips at the Project Site than the Project. The Project would result in a less than significant impact on the nearest CMP intersection, Azusa Avenue and Colima Road, located 2.2 miles southwest of the Project Site, because it would add fewer than 50 vehicle trips to the intersection during either the morning or afternoon peak hours. As the Reduced Intensity Alternative would generate fewer trips, impacts would be less than those of the Project.

c. Traffic Hazards

The Reduced Intensity Alternative would introduce an ingress/egress driveway and signalized intersection at the proposed parcel boundaries between Parcel 1 and Parcels 2 and 3, which would serve as the primary

Table 5-2

**Alternative 2: Reduced Intensity Alternative Future (2018) With Alternative 2 Plus
Cumulative Traffic Conditions Service Levels for Affected Signalized Intersections**

ID	N/S Street Name	E/W Street Name	Peak Period	Existing (2013)		Future (2018) With Alternative 2 Plus Cumulative			
				V/C	LOS	Without Improvements			
						V/C	LOS	Alt. 2 Impact	Sig Impact
1	Fullerton Rd	Gale Ave	A.M.	0.657	B	0.666	B	0.009	No
			P.M.	0.649	B	0.690	B	0.054	No
			SAT	0.792	C	0.817	D	0.046	YES
3	Fullerton Rd	SR-60 Fwy EB Ramps	A.M.	0.663	B	0.697	B	0.034	No
			P.M.	0.657	B	0.704	C	0.047	No
			SAT	0.847	D	0.909	E	0.062	No
4	Fullerton Rd	Colima Rd	A.M.	0.773	C	0.772	C	0.013	No
			P.M.	0.825	D	0.819	D	0.016	No
			SAT	0.841	D	0.851	D	0.029	No
10	Nogales St	La Puente Rd	A.M.	0.818	D	0.834	D	0.016	No
			P.M.	0.774	C	0.796	C	0.022	No
			SAT	0.774	C	0.802	D	0.028	No
13	Nogales St	San Jose Ave	A.M.	0.641	B	0.649	B	0.010	No
			P.M.	0.896	D	0.839	D	0.016	No
			SAT	0.569	A	0.581	A	0.023	No
15	Nogales St	Gale Ave/ Walnut Dr	A.M.	0.820	D	0.771	C	0.046	No
			P.M.	1.125	F	1.044	F	0.145	YES
			SAT	1.002	F	1.045	C	0.185	YES
18	Nogales St	Colima Rd	A.M.	0.810	D	0.798	C	0.011	No
			P.M.	0.720	C	0.718	C	0.020	No
			SAT	0.825	B	0.822	D	0.028	No

Source: Kunzman Associates, Inc., December 2015 (modeling results are provided in Appendix K-2, Trip Generation Worksheets, of this Draft EIR)

Project Site entrance, and a new ingress/egress driveway into Parcels 2 and 3 along the western Project Site boundary, both of which would be designed in accordance with applicable design standards. Proposed accesses and circulation would be reviewed by LACDPW Traffic and Lighting Public Works Road Division with respect to Caltrans/Los Angeles County standards to ensure that this Alternative does not substantially increase hazards due to a design feature. The County would also periodically review traffic operations in the Project vicinity once the Project is constructed to ensure that traffic operations are satisfactory. Impacts would be less than significant.

This Alternative proposes an identical circulation plan, with the above-described access driveways being implemented under the Project as well. The access driveways would be designed in accordance with applicable design standards and reviewed by LACDPW Traffic and Lighting Public Works Road Division, resulting in a less than significant impact. As a result, impacts under the Reduced Intensity Alternative with respect to traffic hazards would be similar to the Project.

d. Emergency Access

Construction of the Reduced Intensity Alternative and construction-related activities and traffic could result in potentially significant impacts on school traffic, pedestrian routes, and transportation safety in the Project vicinity. Construction activity and traffic also has the potential to significantly affect emergency access in the Project vicinity. The Reduced Intensity Alternative would be required to implement Project Design Feature PDF-TRAF-1, which requires the implementation of a Construction Staging and Traffic Management Plan during Project construction. With implementation of Project Design Feature PDF-TRAF-1, construction impacts to emergency access under this Alternative would be less than significant. Similarly, the Project was determined to result in a less than significant construction impact to emergency access, and impacts under this Alternative would be similar to the Project.

With respect to operation, the County would review this Alternative's design plans to ensure the deployment of fire equipment or other services under emergency conditions, among other access provisions, would be adequate for this Alternative in accordance with Los Angeles County, Code of Ordinances, Title 21, Subdivisions, Chapter 21.24, Design Standards, Part 1, Access, Section 21.24.010, General Requirements. This alternative's access drives and internal private drives would be designed to meet the County and LACFD standards, incorporating any revisions requested by LACDPW. Therefore, operation of the Reduced Intensity Alternative would result in a less than significant impact to emergency access.

Similarly, the Project's impacts to emergency access would be less than significant through appropriately designed access and internal circulation, as reviewed and approved by the County. As a result, operational impacts under the Reduced Intensity Alternative would be similar to the Project.

e. Plan and Policy Consistency

The Reduced Intensity Alternative proposes a site plan and development program similar to the Project, except that the high-turnover (sit-down) restaurant use would be omitted, and the floor area for other commercial uses and the number of guestrooms would be reduced by 20 percent. Hotel B on Parcel 3 would also be reconfigured as an all-suites hotel. Because of the overall reduced development program, this Alternative's parking demand based on the County Parking Code would be comparatively lower than under the Project. Compared to the Project, the elimination of the high-turnover restaurant space eliminates demand for 260 spaces, the reduction in retail square footage eliminates demand for 67 spaces, and the elimination of 55 guestrooms in Hotel A eliminates the demand for 29 spaces. The conversion of Hotel B to an all-suites hotel increases Hotel B parking demand from 136 spaces to 162 spaces despite the elimination of 40 guestrooms because suites generate greater parking demand than standard rooms. In summary, the Reduced Intensity Alternative would be required by the County Parking Code to provide 1,114 parking spaces (compared to 1,503 parking spaces under the Project). This represents a reduction in the amount of Code-required parking of 383 spaces compared to the Project.

Peak parking demand would still occur during the weekend at 8:00 P.M., since the land use mix under this Alternative remains similar to that of the Project. The portion of the Project Site within the City of Industry would continue to accommodate up to 75 surface parking stalls to serve the Commercial Center and hotel uses, as under the Project. The amount of subterranean parking provided would be reduced accordingly. Since peak parking demand for the commercial and hotel uses on the three proposed parcels would not be coincidental, demand could still be accommodated on the Project Site through use of shared parking, as under the Project. County Parking Code requirements would exceed the amount of proposed parking by

approximately 342 spaces even under the Reduced Intensity Alternative program, and therefore a Parking Permit would be necessary to allow a shared parking program and reduction from the Parking Code requirement. It is assumed that parking spaces under this Alternative would continue to be full-size spaces provided in surface lots and subterranean structure, although fewer spaces and smaller subterranean structures would be required.

The Reduced Intensity Alternative would be consistent with all adopted plans, policies, and programs since it would still support alternative transportation by locating a mix of commercial and hotel uses in close proximity to existing transit options and by improving pedestrian connections in the immediate Project vicinity. Therefore, under the Reduced Intensity Alternative, impacts with applicable policies applicable to transit, transportation, and parking, including the County Parking Code, would be less than significant.

Similarly, the Project would result in a less than significant parking impact with approval of a requested Parking Permit and the sharing of parking spaces between uses with noncoincidental peak parking demand. Further, the Project would result in a less than significant impact to plan and policy consistency by improving pedestrian connections and supporting transit options by developing a Project within proximity to mass transit options and developing pedestrian connections. Although the Reduced Intensity Alternative would exceed County Parking Code requirements and, like the Project, would require a Parking Permit to allow a shared parking program, this Alternative would provide adequate parking for the proposed uses, and therefore parking-related impacts would be similar to those of the Project.

13. Wastewater

a. Wastewater Collection

During construction of the Reduced Intensity Alternative, the only existing on-site sewer line currently serving other uses (e.g., the 10- to 12-inch vitrified clay pipe (VCP) located in the northernmost portion of the Project Site) would be preserved in place. Furthermore, no deep excavations are proposed in the area of this existing sewer line, so there would not be a substantial potential to damage this sewer line during Project construction. As a result, construction of the Reduced Intensity Alternative would not disrupt sewer services, and impacts would be less than significant. Similarly, Project construction was determined to result in a less than significant impact to wastewater collection because it would not disrupt service to off-site uses. As a result, construction impacts under the Reduced Intensity Alternative would be similar to the Project.

During operation, the Reduced Intensity Alternative would generate an estimated total average sewage flow rate of 0.1354 cubic feet per second, or cfs (which translates to a daily average flow of 87,511 gallons per day [gpd]), and a total peak sewage flow of 0.339 cfs. This sewerage flow would be accommodated by the Los Angeles County Consolidated Sewer Maintenance District's (LACCSMD) 12-inch sewer line from the northwest corner of the Project Site to the 30-inch Sanitation District trunk sewer serving the Project Site. Specifically, with this Alternative's wastewater flows, the 12-inch sewer line would operate at above 50 percent full (specifically, 110 percent of capacity) under existing plus Project conditions. However, because LACDPW design criteria permit sewer lines to operate at 150 percent of capacity, the downstream wastewater collection system has adequate capacity to accommodate the sewage to be generated by the Reduced Intensity Alternative, and a less than significant impact to wastewater collection would result.

In comparison, the Project would generate an estimated total average sewage flow rate of 0.1998 cfs (which translates to a daily average flow of 129,153 gpd) and a total peak sewage flow of 0.4996 cfs. As a result, the Reduced Intensity Alternative represents a reduction in daily average flow and total peak sewage flow of 0.0644 cfs (41,642 gpd) and 0.1606 cfs, respectively. Under the Project, the 12-inch sewer line was estimated to operate at 119 percent capacity, resulting in a less than significant impact. As the Reduced Intensity Alternative represents a comparative reduction in wastewater generation, impacts under this Alternative would be less than under the Project.

b. Wastewater Treatment

The Reduced Intensity Alternative's wastewater generation would be an estimated 60.75 gallon per minute (gpm), or approximately 0.087 million gallons per day (mgd). As indicated in Section 4.L.1, Wastewater, the San Jose Creek WRP has an existing treatment capacity of 100 mgd and currently treats an average daily flow of 71.3 mgd. Based on these numbers, the San Jose Creek WRP has a remaining unused treatment capacity of approximately 28.7 mgd. As a result, the Reduced Intensity Alternative represents a negligible portion (approximately 0.3 percent) of the remaining capacity at the WRP, and a less than significant impact would result.

In comparison, the Project's wastewater generation would be an estimated 89.69 gpm, or approximately 0.108 mgd. Therefore, the Reduced Intensity Alternative represents a reduction of 28.94 gpm, or 0.021 mgd, when compared to the Project. Project wastewater generation was determined to represent a negligible proportion (approximately 0.4 percent) of the remaining unused treatment capacity of the San Jose Creek WRP, and the Project was found to result in a less than significant impact to wastewater treatment. As the Reduced Intensity Alternative would generate less wastewater flows than the Project, impacts under this Alternative would be less than under the Project.

14. Water Supply

a. Construction

The Reduced Intensity Alternative would require construction of a new on-site domestic water and fireflow conveyance system (pipelines), and the connection of this system to the existing 12-inch water pipeline in Gale Avenue. No active water lines serving adjacent properties bisect the Project Site, so there would be no potential to interrupt water service to adjacent properties (such as due to inadvertent damage of existing lines) during construction. Project impacts were determined to be less than significant because no water supply lines bisect the Project Site and no disruption of service would occur. Impacts under this Alternative would be similar to the Project.

b. Water Supply

The Reduced Intensity Alternative would increase on-site water demand by an estimated 116 acre-feet per year (AFY) of potable water at buildout in 2020 (compared to the Project's estimated 145 AFY in 2020), which would increase water demand within the Rowland Water District (RWD) from 13,484 AFY to 13,601 AFY. Because this would be within RWD's potable water supply between the years of 2020 and 2025 (13,500 AFY and 14,700 AFY, respectively), it is anticipated that adequate potable water supply would be available to serve this Alternative. Similarly, assuming demand for nonpotable water of 23 AFY under this

Alternative by buildout in 2020 (for landscape irrigation)¹⁰, nonpotable water demand within the RWD would increase from 5,000 AFY to 5,023 AFY, slightly less than the Project's projected demand of 29 AFY. Because this would fall within the RWD's 2020 nonpotable water supply of 6,200 AFY, adequate nonpotable water supply would be available to serve this Alternative. Therefore, the Reduced Intensity Alternative's water supply impacts would be less than significant.

Project water demand was also determined to be within the RWD's potable water supply between the years of 2020 and 2025, and within the RWD's 2020 nonpotable water supply for the same period, and demand was therefore determined to have a less than significant impact on water supply. The Reduced Intensity Alternative represents a comparative decrease in potable water and nonpotable water demand, compared to the Project. As a result, impacts under the Reduced Intensity Alternative would be less than under the Project.

C. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The ability of the Reduced Intensity Alternative to achieve the underlying Project purpose and specific Project Objectives, presented in Chapter 2.0, Project Description, of this Draft EIR, is summarized in Subsection 5.E, below. As shown, because this Alternative would eliminate high-turnover restaurant space in an effort to reduce trip generation, and in turn eliminate significant unavoidable operational air quality emissions and intersection impacts, the Reduced Intensity Alternative would only partially achieve the underlying Project purpose, which is to provide for the development of a high-quality, integrated development of complementary commercial retail establishments and hotels that promotes economic growth and job creation within a commercial and light industrial corridor developed with compatible uses, as further substantiated below.

Because the Reduced Intensity Alternative would not include any high-turnover restaurant uses, which would limit the Project Site's appeal for and patronage by the daytime employee population in the area as well as the permanent residential population, it would only partially achieve Commercial/Retail Objectives Nos. 1, 3, and 4, which pertain to providing a variety of commercial uses, a diversity of tenant spaces, and ensuring the provision of a range of goods and services for the community. This Alternative would fully achieve the remaining two Commercial/Retail Objectives Nos. 2 and 5, which pertain to locating new commercial development in close proximity to existing similar uses to avoid displacing residential uses or introducing incompatible land uses and the promotion of mobility objectives by siting new commercial infill development in proximity to existing transit and by providing bicycle facilities.

That said, because this Alternative would still provide two hotels serving different needs and markets, the Reduced Intensity Alternative would achieve three of the Hotel Objectives. However, because the number of guestrooms would be substantially reduced, by 95 rooms or approximately 20 percent, it would only partially achieve Hotel Objective Nos. 1 and 2, which pertain to accommodating the growing need for hotel facilities that meet demand in the San Gabriel Valley and providing a high-quality extended stay hotel in the currently underserved San Gabriel Valley where no comparable hotel product exists and demand is increasing.

¹⁰ Water demand represents 120 percent of estimated Project wastewater generation, to account for landscaping irrigation that would not enter the sewer system. As with the Project, 20 percent of water used for irrigation under this Alternative was assumed to be recycled, nonpotable water.

Further, when considering the economic feasibility of the proposed hotel uses, it is important to note that a hotel's base operating costs and therefore net operating income (NOI)¹¹ are to a large degree fixed based on the type of hotel and amenities proposed and must be supported by a given number of rooms to be economically feasible. For this reason, a hotel's operating costs do not increase in direct correlation with an increase in the number of hotel rooms. For instance, a doubling of room count would not double the operating costs because costs for maintenance and amenities are generally fixed. If a hotel's room count is decreased below the NOI, the hotel becomes economically infeasible. In high-demand markets such as urban centers (e.g., downtown Los Angeles), hotels may rely on a higher average daily rate to offset any reduction in room count. However, in less competitive markets, such as the suburban location of the Project Site, hotel operators must rely on an adequate number of rooms to ensure that revenue exceeds NOI. The 20 percent reduction in room count under this Alternative would be expected to decrease revenue by approximately 30 percent or more, depending on market forces. As a result, the proposed hotel uses, as proposed under the Reduced Intensity Alternative, would become economically infeasible. If the proposed hotels were not developed, this Alternative would not meet the Project's primary objective or the objectives related to the proposed hotel uses.

Because this Alternative would eliminate high-turnover restaurants and would reduce retail square footage, it would only partially meet Siting and Design Objective No. 1, to create an activity node and ensure a high level of pedestrian activity during the day and evening by co-locating a sufficiently diverse concentration of uses with a complementary peak period. This alternative would fully achieve the remaining four Siting and Design Objectives.

As with the proposed hotels, the Project's proposed mix of commercial uses has been allotted in a manner to support the economic feasibility of the Project. High-turnover restaurant use is an important tenant type for commercial shopping centers because it serves as anchor use that generates a level of patronage that then benefits other co-located commercial uses because of proximity. In this manner, potential retail tenants typically consider the provision of the high-turnover restaurant use when deciding whether to locate in a given commercial plaza.

The reduction in pedestrian traffic resulting from the omission of the high-turnover restaurant use could reduce visitor traffic to the Commercial Center, and the balance of commercial uses would likely suffer. Specifically, the reduction in visitor traffic would be expected to result in higher tenant turnover, longer "lease-up" periods, higher vacancy rents, and reduced average rents throughout the center. The reduction in floor area from 125,820 square feet to 88,000 square feet may also render the Commercial Center on Parcel 1 financially infeasible as the result of a materially higher cost-per-square-foot because of the lack of economies for land costs, soft costs (e.g., entitlements), and construction costs. Omitting the high-turnover restaurant use is likely to cause reduced revenue potential, higher potential for unprofitability, and higher risk potential, rendering the Commercial Center on Parcel 1 likely to become economically infeasible. Any reduction in room count for the proposed hotels could exacerbate this condition, as the hotel guests are expected to contribute visitors to the Commercial Center, thus supporting its economic viability.

Finally, because of the 20 percent reduction in the number of guest rooms and elimination of high-turnover restaurants, and to a lesser degree the reduction in retail square footage, the Reduced Intensity Alternative

¹¹ *Net operating income (NOI) = income minus operating costs, not including debt service and other such expenses.*

would not achieve Economic and Employment Objective No. 1 to the same extent as the Project, which is essential to the Project's financial feasibility: create a viable mix of complementary retail, office, and hotel uses, of a sufficient size to create internal synergy and attract outside patrons. As discussed above, the reduction in anticipated revenue for the hotel and retail uses separately may be so substantial as to render the proposed components, and development itself, financially infeasible. It would only partially achieve the remaining Economic and Employment Objective Nos. 2 and 3, to contribute to the health of the community through jobs creation and to generate revenue for the County through net new sales and room taxes. If the Project Applicant were to conclude that the development is economically infeasible, this Alternative's ability to meet the commercial, hotel, and site design objectives would be further reduced.

D. CONCLUSION

The Reduced Intensity Alternative would avoid the Project's significant unavoidable operational air quality impacts and intersection impacts; the remaining construction-related and operational impacts would be substantially similar to those of the Project, with the exception of aesthetics, operational air quality, odors, construction-related GHG emissions, operational noise, and operational public services and utilities impacts, which would be slightly reduced. However, this Alternative would only partially achieve the underlying Project purpose, and of the 18 specific Project Objectives set forth in Chapter 2.0, Project Description, of this Draft EIR, it would fully achieve only nine and would partially achieve eight. Moreover, due to the suburban setting of the Project Site and relatively fixed-base operating revenue, or NOI, for the type of hotel proposed, the 20 percent reduction in room count proposed under the Reduced Intensity Alternative has the potential to reduce hotel revenue for one or both of the hotels to the point of becoming economically infeasible. Similarly, given visitation patterns for commercial plazas of the type proposed, the omission of high-turnover restaurant use would reduce visitor traffic to the Commercial Center, potentially to the point where its development becomes economically infeasible. Even if the hotels are constructed, the proposed reduction in room count would also serve to reduce the economic viability of the Commercial Center since hotel guests would patronize the commercial uses. As a result, the Reduced Intensity Alternative would not achieve the objectives pertaining to the financial viability of the proposed mix of uses. For these reasons, this Alternative is not considered feasible.

5.0 ALTERNATIVES

C. ALTERNATIVE 3: CODE COMPLIANT COMMERCIAL ALTERNATIVE

A. DESCRIPTION OF THE ALTERNATIVE

The Code Compliant Commercial Alternative would result in development of the Project Site in conformance with its underlying General Plan land use and zoning designations. The Project's requested Zone Change (from M-1.5 to C-3-[DP]) for Parcels 2 and 3 would not be sought, and the entire portion of the Project Site within the unincorporated County would remain in the M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion) zone.

Since hotel uses are prohibited in the M-1.5 zone¹², they are not proposed under this Alternative. Rather, Parcels 2 and 3 would be developed with uses permitted in the M-1.5 zone. This alternative assumes commercial condominiums for retail, restaurant, and office uses would continue to be developed on the area designated as Parcel 1 under the Project. Commercial condominiums with the same mix of uses would also be developed on the areas designated as Parcels 2 and 3 under the Project to create a cohesive commercial campus setting. This Alternative would not subdivide of the portion of the Project Site within the unincorporated County into three smaller parcels; the portion of the Project Site within the unincorporated County would remain a single parcel, and that the Project would be developed in a single phase.

The Code Compliant Commercial Alternative envisions the development of floor area up to the maximum permitted in the M-1.5 zone in the Rowland Heights CSD. For commercial and industrial land uses, the CSD establishes maximum permitted lot coverage of 40 percent. When applied to the 14.06-acre (612,454 square-foot) portion of the Project Site within the unincorporated County, the commercial buildings would be permitted a footprint of roughly 244,982 square feet. As with the Project's proposed commercial uses, the commercial buildings are assumed to be two stories in height, resulting in a total permitted floor area of roughly 489,963 square feet (an increase of 43,263 square feet when compared to the Project's proposed 446,700 square feet of floor area). The maximum building height for all buildings proposed under this Alternative would not exceed the CSD established height of 45 feet above grade (LACC Section 22.44.132(D)(4)). For purposes of comparison, this Alternative would develop the proposed commercial uses at the same ratio as under the Project, resulting in the following:

- retail floor area occupying 66.5 percent (or 325,969 square feet, an increase of 259,003 square feet over the Project's 83,707 square feet) of the total floor area
- high-turnover sit-down restaurant floor area occupying 15.9 percent (or 78,103 square feet, an increase of 58,047 square feet over the Project's 20,056 square feet) of the total floor area
- quality restaurant floor area occupying roughly 15.9 percent (or 78,103 square feet, an increase of 58,046 square feet over the Project's 20,057 square feet) of the total floor area
- office floor area occupying roughly 1.6 percent (or 7,788 square feet, an increase of 5,788 square feet over the Project's 2,000 square feet) of the total floor area

¹² *Los Angeles County Code, Title 22, Planning and Zoning Code, Chapter 22.32.100 et seq.*

The portion of the Project Site within the City of Industry would continue to be developed with 75 parking spaces, as under the Project.

Building layout on the Project Site would be substantially similar to that of the Project, with two commercial buildings in place of the two hotel buildings proposed under the Project. For purposes of this Alternative, the two westerly commercial buildings proposed are designated Building Nos. 5 and 6.

The Code Compliant Commercial Alternative would provide 3,232 parking spaces throughout the Project Site.¹³ As with the Project, all surface and subterranean parking spaces will be full size, with no compact spaces planned. In contrast to the Project, a Parking Permit would not be sought. Subterranean parking levels would continue to be located below Building Nos. 2, 3, and 4, as well as under Building Nos. 5 and 6. As with the Project, restaurant floor plans are not available at this time. Thus, the Code Compliant Commercial Alternative would also include a Condition of Approval similar to that required for the Project to ensure adequate parking supply on the Project Site. Specifically, the Condition of Approval would limit the Code Compliant Commercial Alternative's total maximum permitted occupancy load for all restaurant use. When restaurant floor plans are submitted for Director's Review, it may result in occupancy of restaurant floor area in excess of that used as the basis for this analysis. In such an event, the retail floor area would be decreased in an amount corresponding to the increase in restaurant floor area. Because a greater number of parking spaces are proposed under this Alternative, more subterranean parking would also be required when compared to the Project, thus requiring more excavation.

Other components of the Code Compliant Commercial Alternative would be similar to the Project. Access roadways and internal pedestrian circulation would remain largely as proposed under the Project, with minor modifications at the location of the Project's hotel entrances. Pedestrian walkways would continue to connect buildings internal to the Project Site and off-site commercial uses; sidewalk improvements, a landscaped setback, and ADA-accessible access would continue to be provided along Gale Avenue. Building Nos. 1-4 would continue to include a centrally located gathering common area that includes seating, a water feature, and landscaping, and a historically themed common area. The ground-floor open space/landscaped areas for the Project's hotel uses would be redesigned as open space/landscaped areas for Building Nos. 5 and 6. Bench seating and landscaped planters would continue to be located throughout the Project Site. As with the Project, a CUP would be required to authorize a commercial shopping center containing more than three business establishments, and a Drainage Concept Review would be required for the channelization for the undergrounding of the on-site channel. The channelization would also continue to require USACE, CDFW, and RWQCB permits.

B. ENVIRONMENTAL IMPACTS

1. Aesthetics

a. Visual Character

During construction, the demolition, grading, and construction of new buildings, sidewalk improvements, and installation of landscaping would be visually disruptive while these activities occur. However, because

¹³ County Parking Code requires 1,304 spaces for the proposed commercial retail uses (1/250 sf), 19 spaces for the proposed general office uses (1/400 sf), and 1,909 spaces for the restaurant uses $[(156,206 \text{ sf} * 55\%)/15]/3$.

of the relatively short-term nature of construction, the use of construction fencing which would partially screen construction activities, and the lack of visual resources on the Site and surrounding area, construction activities under the Code Compliant Commercial Alternative would result in a less than significant impact on the existing visual character of the Project Site. Similarly, construction of the Project was determined to result in a less than significant impact on visual character due to the limited duration of construction and the use of screening. As a result, impacts under this Alternative would be similar to the Project.

The Code Compliant Commercial Alternative would introduce six two-story commercial buildings to the Project Site in a layout comparable to that proposed under the Project. The two-story buildings would be substantially visually consistent with the existing low-rise development in the area. Because similar commercial and light industrial development and SR-60 are located in the immediate and surrounding vicinity, the Code Compliant Commercial Alternative would not substantially change the existing developed character of the area and would have a less than significant impact on visual character.

Similarly, the Project was determined to result in a less than significant impact to visual character. However, the Project proposes two six-story hotels which would be more visually prominent within the existing low-rise development. As discussed in Section 4.A, Aesthetics, of this Draft EIR, the height of the two hotel buildings could contrast with the existing low-rise setting of the area. However, the Project's design along with the Site's location away from residential uses were determined to result in development that is compatible with the surrounding commercial and industrial development, and a less than significant impact would result. Nonetheless, because the six-story hotels would be replaced with low-rise two-story commercial buildings, impacts on visual character under the Code Compliant Commercial Alternative would be less than under the Project.

b. Light and Glare

As discussed in Section 4.A, Aesthetics, of this Draft EIR, nighttime lighting is generated by vehicle traffic on SR-60, illuminated signage and pole signs, commercial signage, and building and security lighting. Because of existing high levels of ambient light, any artificial light associated with construction activities would not significantly impact residential uses in a manner that would adversely affect nighttime views or substantially alter the character of the uses surrounding the construction area, and a less than significant impact would result. Similarly, Project construction was determined to result in a less than significant impact because of relatively high existing ambient light conditions. As a result, impacts under the Code Compliant Commercial Alternative would be similar to the Project.

During operation, illuminated signage and other lighting (e.g., parking security, landscaping) associated with the Code Compliant Commercial Alternative may be considered a potential source of nighttime glare or ambient lighting. Light-sensitive land uses in the area include the Best Western Plus Executive Inn hotel directly south of the Project Site and residential uses south of SR-60. No point sources of light representing a great contrast with surrounding ambient light conditions would be directed toward surrounding roadways or sensitive uses under this Alternative, and the intensity of light emanating from proposed signs would also be regulated by the Rowland Heights CSD, which requires a sign program to be submitted for approval by the Director of Planning. With regard to glare, the exterior building façades would be composed of materials unlikely to cause any kind of glare impact due to light reflection.

Similarly, the Project's new commercial signage, parking lot lights, and visible interior lighting were not considered to be a substantive source of new lighting, given the area's existing industrial and commercial uses, and impacts were determined to be less than significant. The Project was also determined to result in a less than significant glare impact because building materials were unlikely to cause any kind of glare impact. As a result, light and glare impacts under the Code Compliant Commercial Alternative would be similar to those of the Project.

c. Shading

The Code Compliant Commercial Alternative would limit development to two stories in height. Given the absence of the shadow sensitive uses in the immediate vicinity and this Alternative's adherence to applicable setbacks, building shadows would not result in significant shading impacts, if shadows extend beyond the property boundary at all between the hours of 9:00 A.M. and 5:00 P.M.

In comparison, the Project was determined to result in a less than significant impact with regard to shade/shadow. Because the Code Compliant Commercial Alternative proposes only two-story buildings, impacts under this Alternative would be less than under the Project.

2. Air Quality

a. Consistency of the Project With Applicable Plans and Policies

Construction jobs under the Code Compliant Commercial Alternative would be relatively small in number and temporary in nature, and thus would not conflict with the long-term employment projections upon which the AQMP is based. In addition, construction of this Alternative would not conflict with implementation of strategies to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. Construction of the Code Compliant Commercial Alternative would also be required to comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403.

Construction of the Project was determined to result in a less than significant impact because it would not conflict with long-term employment projections, would not interfere with plans to replace older construction equipment, and would comply with applicable SCAQMD regulations. Construction activities under this Alternative would be larger in scale compared to the Project. However, pollutant emissions and fugitive dust from Site preparation and construction activities would be similar on a daily basis, as the duration and not the intensity of these activities could increase compared to the proposed Project. As regional construction air quality impacts are evaluated on a worst-case (maximum) day, impacts would be similar to those of the Project and would be less than significant.

With regard to operation, the Project was determined to result in a less than significant impact because it would be consistent with the growth projections as contained in the County and City of Industry's General Plans and thus be consistent with the growth projections in the AQMP. Further, the Project would be consistent with Transportation Control Measures intended to reduce regional mobile source emissions by reducing vehicle trips for patrons and employees and increasing the concentration of commercial development near public transit. The Code Compliant Commercial Alternative would result in more square footage compared to the Project, and daily trip generation would be higher than the Project. Impacts would be greater than under the Project. However, the AQMP incorporates existing zoning as part of growth

projections. Because this Alternative would be built in compliance with the existing zoning, operation of this Alternative would be consistent with the projections in the AQMP. Impacts under this Alternative would be similar to those of the Project and would be less than significant.

b. Violation of Air Quality Standards

Although this Alternative would result in more development on the Site, it could result in construction which, on the basis of the most intensive day of activity, is expected to be the same as the Project. The Code Compliant Commercial Alternative would result in slightly increased square footage in comparison to the Project. In addition, the building layout of this Alternative would be similar to that of the Project. As a result, construction techniques (excavation, building construction, architectural coatings) and intensity under this Alternative would also be similar to the Project on a daily basis. As discussed previously, pollutant emissions and fugitive dust from Site preparation and construction activities would be similar on a daily basis since the duration, not the intensity, of these activities would increase compared to the Project. Thus, construction emissions generated by the Code Compliant Commercial Alternative would be greater than those of the Project over the construction period. Regional construction impacts during maximum conditions—those used for determining significance—would be similar to those of the Project on a daily basis and would be less than significant. Localized pollutant construction impacts would also be similar to those of the Project, since both the intensity and duration of excavation and grading would be similar, and would also be less than significant.

With respect to Project operation, emissions would exceed the applicable mass thresholds of significance for VOC and NO_x during full buildout and interim operations (overlap of Phase 1 development in combination with the ongoing construction emissions from Phase 2 construction). As a result, operation of the Project would potentially result in emissions that lead to a violation of an air quality standard or contribute substantially to an existing or projected air quality violation, thus operational impacts would be potentially significant. Due to the increase in vehicle trips under this Alternative (see Subsection 6.a below), operational emissions under this Alternative would also increase in comparison to the Project. Because this Alternative would result in greater development and more vehicle miles associated with long-term operations, emissions of criteria pollutants would increase. As shown in Appendix K-1, under this Alternative, long-term operational VOC and NO_x emissions would be 100 and 175 lbs/day, respectively, an increase of 77% and 132%, respectively compared to the Project. In addition, long-term operational CO emissions would exceed thresholds under this Alternative due to increased vehicle trips, resulting in a significant impact. These daily emission levels are greater than the applicable SCAQMD mass emission thresholds, and the Code Compliant Commercial Alternative would result in potentially significant operational impacts. Operational impacts under this Alternative would therefore be greater than those of the Project, and would be significant and unavoidable.

c. Nonattainment Pollutants

The Los Angeles County portion of the Air Basin is designated non-attainment for the ozone and PM_{2.5} NAAQS and non-attainment for the ozone, NO₂, PM₁₀, and PM_{2.5} CAAQS. Construction of the Project was determined to result in a less than significant impact because Project construction would occur in accordance with CARB and SCAQMD control measures so that construction emissions from the Project would not exceed SCAQMD significance thresholds. As discussed above, construction of the Code Compliant Commercial Alternative would result in greater overall emissions, but on a daily basis, emissions would be the same as

than under the Project. Therefore, as with the Project, construction of the Code Compliant Commercial Alternative would result in a less than significant impact.

Project operations would exceed the threshold of significance for VOC and NO_x during interim operations when combined with ongoing construction emissions as well as full buildout. Even with implementation of Project Design Features to meet the requirements of LEED® Silver, impacts would remain because the majority of emissions associated with the operation of the Project are from vehicles accessing the Project Site. The Code Compliant Commercial Alternative would result in a greater number of vehicle trips, which would increase operational emissions to levels further above significance thresholds. As a result, impacts under the Code Compliant Commercial Alternative would be greater than under the Project.

d. Substantial Pollutant Concentrations

When determining localized air quality impacts under the Code Compliant Commercial Alternative, it is useful to compare them to the Project since the Project provides a baseline of known impacts. As shown in **Table 4.B-6**, *Maximum Unmitigated Localized Construction Emissions*, and **Table 4.B-7**, *Maximum Unmitigated Localized Operational Emissions – Interim and Build*, in Section 4.B, Air Quality, of this Draft EIR, Project construction and operations were determined to result in a less than significant localized impact to substantial pollutant concentrations, even when considering the interim construction of Phase 2 while Phase 1 is operational, because they would not generate emissions that exceed allowable localized thresholds for these pollutants. Although the Code Compliant Commercial Alternative represents an increased construction schedule and overall program of development when compared to the proposed Project, construction emissions on a daily basis would be similar to the proposed Project. As discussed previously, this Alternative would have more square footage compared to the Project, but buildings would be in a similar layout to the Project, resulting in similar construction activities on a daily basis. As localized impacts are assessed on a short-term basis (<1 day), impacts would be similar to the Project and would result in a less than significant impact.

As with localized air quality impacts, the Project provides a good baseline against which to compare impacts under the Code Compliant Commercial Alternative. The Project was determined to result in a less than significant impact to CO hotspots at study area intersections. Baseline CO levels in the Project area were found to be substantially below the federal and State standards. The Project would not cause or contribute to the formation of CO hotspots, and CO concentrations at Project impacted intersections would remain well below the ambient air quality standards. The Code Compliant Commercial Alternative would result in greater peak hour trips which would also result in greater CO concentrations at Project impacted intersections. However, peak hour trips at study intersections would be less than those analyzed for the Project. Although the Code Compliant Commercial Alternative represents an increased peak hour trip generation and overall program of development when compared to the Project and impacts under this Alternative would be greater than under the Project, impacts would remain less than significant with regard to CO hotspots.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, automotive repair facilities, and dry cleaning facilities. Although the Code Compliant Commercial Alternative does not propose these types of uses, it would nonetheless generate diesel particulate matter and VOCs during construction and operation. When considering the release of the materials into the atmosphere, the Project is a good baseline of comparison. It was determined that the Project would result in a less than

significant impact with regard to TACs because it would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and would utilize incidental amounts of toxic substances such as oils, solvents, and paints in accordance with applicable SCAQMD rules for their manufacture and use. As the Code Compliant Commercial Alternative represents an increase in overall construction and development program, it would emit an increased quantity of TACs. However, the land uses associated with this Alternative are not expected to emit large quantities of TACs during long-term operations. Therefore, construction and operational impacts to TACs would be less than significant, but both would be greater than under the Project.

e. Odors

Potential activities that may emit odors during construction activities include the use of architectural coatings and solvents and the combustion of diesel fuel in on- and off-road equipment. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. This Alternative would not introduce land uses associated with odor complaints. Construction and operation of the Code Compliant Commercial Alternative would not generate substantial odorous emissions. Construction equipment would comply with CARB anti-idling regulations to minimize diesel emissions. Architectural coatings would comply with CARB and SCAQMD regulations regarding VOC content. During operations, food would be prepared in indoor kitchen areas and refuse would be maintained and disposed of in accordance with applicable regulations. As a result, the Code Compliant Commercial Alternative would not create objectionable odors affecting a substantial number of people, and impacts would be less than significant.

Similarly, the Project would result in a less than significant construction and operational impact relative to odors because it also would not introduce land uses associated with odor complaints, would allow only indoor cooking, and would use compliant architectural coatings. However, because this Alternative would result in an increase in the construction schedule and overall development, including the number of kitchens and refuse collection areas, impacts under this Alternative would be greater than under the Project. Impacts under this Alternative would remain less than significant with regard to odors.

3. Biological Resources

a. Special Status Species

The Code Compliant Commercial Alternative would underground the existing on-site storm drain channel and require the removal of the single southern California black walnut (CNPS Rank 4) from within the channel. However, the CNPS Rank 4 assigned to the tree represents a low-level watch list sensitivity status and the removal of one specimen from a highly disturbed location would not be considered an adverse effect to the species. Therefore, the Code Compliant Commercial Alternative would have a less than significant impact to special status species.

The Project was determined to result in a less than significant impact on special status species because of the removal of the California black walnut. Impacts to special status species under the Code Compliant Commercial Alternative would therefore be similar to those of the Project.

b. Sensitive Plant Communities

The Code Compliant Commercial Alternative would develop the Project Site in a manner similar to that proposed by the Project, except that two commercial buildings consisting of commercial (retail, restaurant, office) would be developed on Parcels 2 and 3. This alternative would result in the removal of on-site vegetation; however, while plant communities dominated by willows are identified as sensitive habitats by CDFW, the Project Site supports only a few willow trees within existing channel, which in the past have periodically been removed to allow unimpeded flow within the northern drainage channel. The vegetation on Site does not comprise a sensitive plant community; therefore, impacts under this Alternative would be less than significant.

Similarly, the removal of existing on-site vegetation under the Project, including willow community in the existing channel, was determined to result in a less than significant impact to sensitive plant communities. Since the Code Compliant Commercial Alternative would remove vegetation and underground the existing channel, impacts under this Alternative would be similar to those of the Project.

c. Jurisdictional Resources

This Alternative would underground the existing partially channelized on-site drainage and remove a small patch of cattails from the storm drain channel, as would the Project. Accordingly, the Code Compliant Commercial Alternative would be required to implement Project Mitigation Measure MM-BIO-1, which requires the Project Applicant to obtain a CWA Section 404 permit from the USACE, a CWA Section 401 permit from the RWQCB, and Streambed Alteration Agreement permit under Section 1602 of the California Fish and Game Code from the CDFW prior to the issuance of any grading permits. Implementation of Project Mitigation Measure MM-BIO-1 would reduce impacts to jurisdictional resources to a less than significant level. Impacts to jurisdictional resources under this Alternative would therefore be similar to those of the Project and less than significant.

d. Wildlife Movement

This alternative would remove existing on-site vegetation, including small trees, shrubs, and groundcover that have the potential to support nesting birds, as would the Project. This is considered a potentially significant impact. However, the Code Compliant Commercial Alternative would be required to implement Project Mitigation Measure MM-BIO-2, which requires the Project Applicant to demonstrate to the satisfaction of the County that construction would occur outside the breeding season or that nests are identified and appropriately avoided. With implementation of Project Mitigation Measure MM-BIO-2, impacts to wildlife movement would be reduced to a less than significant level. Impacts on wildlife movement under this Alternative would therefore be similar to those of the Project and less than significant.

e. Oak Woodlands or Unique Native Trees

As is the case under the Project, the Code Compliant Commercial Alternative would have no impact to oak woodlands because no oak trees are located on the Project Site. However, this Alternative would result in the removal of one unique native tree, the southern California black walnut. Similar to the Project, the removal of one specimen of a unique native tree from a highly disturbed location would be a less than significant impact.

4. Cultural Resources

a. Archaeological Resources

The Code Compliant Commercial Alternative would require more excavation for underground parking compared to the Project, since the increase in retail and restaurant square footage would require an increase in parking. Construction would therefore still result in the potential to uncover previously unknown archaeological resources on the Project Site, as the sensitivity of the Site, based on the nearby location of other recorded sites, would remain unchanged. Project construction was determined to result in less than significant impacts on archaeological resources, after mitigation requiring construction monitoring and implementation of a removal and treatment plan in the event of the discovery of significant resources. Impacts on archaeological resources under this Alternative would be substantially similar to those of the Project. Project Mitigation Measures MM-ARCHAEO-1 through MM-ARCHAEO-4, which require construction monitoring and implementation of a recovery and treatment plan in the event archaeological resources or human remains are disturbed, would be applicable to this Alternative.

b. Paleontological Resources

The Code Compliant Commercial Alternative would increase the required amount of excavation compared to the Project. Therefore, construction would still result in the potential to uncover previously unknown paleontological resources on the Project Site, as the sensitivity of the Site, based on the presence of the Puente Formation rock unit, would remain unchanged. Project construction was determined to result in less than significant impacts on paleontological resources after mitigation. Impacts on paleontological resources under this Alternative would be substantially similar to those of the Project. Project Mitigation Measures MM-PALEO-1 through MM-PALEO-4, requiring construction monitoring and implementation of a recovery and treatment plan in the event paleontological resources are disturbed during earthmoving activities on Site, would be applicable to this Alternative.

5. Geology

a. Geologic Hazard Effects

The Project Site is not located within a State-designated Alquist-Priolo Earthquake Fault Zone, and there would be no potential for on-site fault rupture. With regard to ground shaking/seismicity, the Project Site would continue to be subject to periodic ground shaking and partially underlain by liquefiable soils that are classified as Site Class F for design purposes. The liquefiable soils could potentially result in dynamic settlement during a seismic event. To address Site Class F soil conditions, building design would be required by the LACC and County plan approval process to effectively implement Project Design Features similar to that of the Project. Implementation of the specific engineering recommendations contained within a Site-specific Geotechnical Report approved by LACDWP prior to the issuance of a grading permit would be required, as under the Project.

The Project was determined to result in less than significant impacts associated with fault rupture, ground shaking and seismicity, liquefaction, differential settlement, and cut and fill stability with the implementation of Project Design Features that propose that building design is in accordance with the recommendations of a Site-specific Geotechnical Report, as approved by the LACDWP prior to the issuance of a grading permit.

The same Project Design Feature would apply to this Alternative, and impacts with regard to geologic hazard under this Alternative would therefore be similar to the Project and less than significant.

6. Greenhouse Gas Emissions

a. Greenhouse Gas Emissions

The Code Compliant Commercial Alternative would generate an increase in GHG emissions during both construction and operation when compared to existing conditions. When determining GHG emission impacts under the Code Compliant Commercial Alternative, it is useful to compare them to the Project since the Project provides a baseline of known impacts. As presented in Table 4.F-4, Annual Greenhouse Gas Emissions, in Section 4.F, Greenhouse Gas Emissions, of this Draft EIR, when construction and operational GHG emissions are amortized over the life of the Project, the Project would constitute an equivalent or greater reduction from BAU than has been determined by CARB to be necessary to meet the goals of AB 32 – that is, a reduction of at least 15.8 percent fewer GHG emissions than a comparable BAU development. GHG emissions reductions take into account both mobile sources and on-site sources. With regard to mobile sources, the percent reduction in trip generation would be less than the Project due to the absence of hotel uses, which consists of pass-by trips and internal capture due to the collocation of different land uses. Therefore, with regard to mobile sources, the reduction in vehicle trips under this Alternative would be less than the Project on a percentage basis. The Code Compliant Commercial Alternative would also implement energy efficiency measures that would exceed the Title 24 Building Standards Code. As a result and as shown in Appendix K-1, this Alternative would result in a GHG reduction of 7.7 percent compared to BAU, which does not meet the target reduction of at least 15.8 percent. Therefore, this Alternative would result in a significant unavoidable impact with regard to GHG reduction targets. Impacts under this Alternative would be therefore be greater than the less than significant Project impacts.

b. Greenhouse Gas Reduction Plans

The Code Compliant Commercial Alternative would generate an increase in GHG emissions when compared to existing conditions. As with the Project, this Alternative would incorporate Project Design Feature PDF-AQ-1 that would reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. The Code Compliant Commercial Alternative would also incorporate characteristics that would reduce transportation-related GHG emissions by locating project-related jobs and retail and restaurant uses near residential and commercial uses and within one-quarter mile of transit, thereby encouraging alternative forms of transportation and pedestrian activity. Also, the Alternative would be constructed and operated in a manner consistent with a Silver Certification from the LEED® program or the equivalent. However, with implementation of these Project Design Features, the Code Compliant Commercial Alternative would not meet the target GHG reduction percentage goals of AB 32. Therefore, this Alternative would result in a greater, and significant and unavoidable impact, compared to the less than significant Project impact.

7. Hydrology and Water Quality

a. Water Quality

Construction of the Code Compliant Commercial Alternative would involve Site preparation activities including excavation and grading. Such activities would temporarily alter the existing drainage patterns and water flows within the Project Site. Exposed and stockpiled soils could be subject to erosion and conveyance

into nearby storm drains during storm events. However, as the construction site would disturb an area greater than one acre, a SWPPP identifying temporary BMPs would be implemented in accordance with County LID requirements. All grading activities would require grading permits from the LACDPW and City of Industry, which include requirements and standards designed to limit potential impacts associated with erosion to permitted levels. Upon buildout, this Alternative would be expected to result in approximately the same impervious area as under the Project. Project construction impacts on water quality were determined to be less than significant with the implementation of BMPs in accordance with NPDES SWPPP requirements, and impacts under this Alternative would be similar to those of the Project.

During operations, the Code Compliant Commercial Alternative would be expected to increase other impervious surface areas that could increase the rate of runoff from the Project Site and potentially introduce new pollutants to stormwater flows. In accordance with the County LID requirements, this Alternative would be required to implement structural BMPs to reduce the potential for pollutants to enter stormwater flows leaving the Project Site and maintain permitted flow volumes and rates to permitted levels. It is anticipated that these BMPs would be largely the same as under the Project because the volume of stormwater runoff and tributary surface areas would be materially the same as under the Project. Subarea 2B-6B would continue to retain all stormwater flows beyond that permitted by the County, with the portions of the Project Site containing Building Nos. 5 and 6 flowing undetained to either the 90-inch RCP or Gale Avenue. The final selection of BMPs would be chosen during the LACDPW Drainage Concept Review and during the City of Industry's review of the Project's final storm drain plans. With implementation of approved BMPs, the Code Compliant Commercial Alternative would result in a less than significant impact to water quality, similar to the Project.

Similarly, Project operation would also result in a less than significant impact, for although the Project would introduce new impervious surface areas and potential new pollutant sources, as well as reduce any biofiltration from the partially channelized storm drain, it would also introduce structural BMPs in accordance with County LID requirements, which prevent the degradation of water quality. Further, Project construction would implement BMPs in accordance with the required SWPPP, resulting in a less than significant impact. As a result, impacts under this Alternative would be similar to those under the Project.

b. Drainage Patterns and Stormwater Drainage System

During construction, the implementation of BMPs outlined in a Site-specific SWPPP would control potential impacts from stormwater runoff. Where impervious surfaces are introduced to the Project Site, they would occur in correlation with the proposed BMPs to maintain permitted runoff volumes. The County and City of Industry would monitor compliance with these requirements as part of the Project approval process. All grading activities would require grading permits from the LACDPW and City of Industry, which include requirements and standards designed to limit potential impacts associated with erosion to permitted levels. Therefore, construction of this Alternative would result in a less than significant impact to drainage patterns and the stormwater drainage system. Similarly, construction of the Project would result in less than significant impact to drainage patterns and stormwater drainage systems with the implementation of BMPs and compliance monitoring. As a result, construction impacts under this Alternative would be similar to the Project.

Regarding operation, the Code Compliant Commercial Alternative would develop the Project Site with impervious surface areas in a manner similar to the Project. Thus, like the Project, without the

implementation of appropriate measures, the Code Compliant Commercial Alternative would increase flow volumes and reduce concentration times in a manner exceeding County permitted flow volumes to receiving water bodies. The development of two commercial buildings in lieu of the two hotels proposed under the Project would result in materially the same post-development drainage patterns, with one building rooftop being swapped for another. County and City of Industry review and approval of the proposed stormwater drainage system would ensure on-site retention is adequate for the Code Compliant Commercial Alternative. Upon implementation of the approved BMPs, this Alternative's contribution to the MTD No. 1000 Line B system would be within County-permitted volumes, and downstream peak flow rates would be unaffected after the confluence of MTD No. 1000 Lines A and B. Thus, the Code Compliant Commercial Alternative would limit flow volumes to those permitted by the County and would not exceed the capacity of existing or planned stormwater drainage systems, and less-than-significant impact would result. Impacts would be similar to those of the Project and would be less than significant.

8. Land Use and Planning

a. County Planning Documents

Under the Code Compliant Commercial Alternative, the Project Site would be developed in a manner with its underlying land use designation and zoning regulations. The Project's requested Zone Change (from M-1.5 to C-3-[DP]) for Parcels 2 and 3 would not be sought and the entire portion of the Project Site within the unincorporated County would remain in the M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion) Zone. This Alternative's proposed commercial uses are consistent with the land use documents governing the Project Site, including the Rowland Heights CSD. For instance, this Alternative proposes a maximum site coverage of 40 percent and maximum building heights would be 45 feet above grade or less in accordance with LACC Section 22.44.132(D)(4). Site design would adhere to all applicable landscaped setbacks, including the 10-foot landscaped setback along Gale Avenue. Building architecture and materials would be of a high-quality design, and building articulations would be utilized to break up building massing. The Code Compliant Commercial Alternative would also support planning objectives to reduce vehicle miles traveled and encourage the use of public transit by locating a commercial development within proximity to existing transit options and residential communities, as well as by improving pedestrian connection within the Project Site and to adjacent properties. Moreover, the Code Compliant Commercial Alternative would continue to represent a compatible infill development on an underutilized parcel within an urban, developed portion of unincorporated Los Angeles County that is developed with similar uses. As a result, the Code Compliant Commercial Alternative would be consistent with applicable planning documents.

The Project was determined to result in a less than significant impact with respect to policy compliance through County approval of requested entitlements, including a zone change from M-1.5 to C3 for the proposed hotel parcels, a Vesting Tentative Tract Map to subdivide the portion of the Project Site within the unincorporated County into three parcels, and various CUPs to permit buildings in excess of permitted heights and the sale of alcoholic beverages. In addition, the Project would comply with the Rowland Height CSD. By proposing only two story buildings on the western portion of the Project Site, the Code Compliant Commercial Alternative would somewhat improve the compatibility of the proposed development with existing development to the west, which consists of two-story commercial buildings. However, the Project was determined to have a less than significant impact, as the adjacent buildings are not sensitive to this transition and the nearest residential land uses are more than 300 feet south of the Project Site across SR-60. Nonetheless, because this Alternative would develop the Project Site in accordance with applicable land use

plans and policies, thereby eliminating the need for a zone change or CUPs for a height exemption, impacts under this Alternative would be less than those of the Project.

b. Los Angeles County Code

Under the Code Compliant Commercial Alternative, the Project Site would be developed in compliance with the underlying land use designation and zoning regulations. The Project's requested Zone Change (from M-1.5 to C-3-[DP]) for Parcels 2 and 3 would not be sought, and the entire portion of the Project Site within the unincorporated County would remain in the M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion) zone. This alternative's proposed commercial uses are consistent with the underlying M-1.5 zone. As discussed above, the Code Compliant Commercial Alternative would be compatible with adjacent and nearby development. The two western commercial buildings would be delineated from the adjacent Concourse Business Park by a decorative site wall and landscaped buffer. Similarly, the eastern commercial uses would also be of a scale, height, and use compatible with the Rowland Heights Shopping Center. The nearest residential uses are 300 feet south of the Project Site across SR-60, and therefore development proposed under this Alternative would not conflict with residential uses.

In contrast, the Project would require County approval of a zone change for the hotel parcels, a tentative tract map, and various CUPs to result in a less than significant impact to the LACC. The Code Compliant Commercial Alternative would be slightly more compatible with the adjacent Concourse Business Park, as it would develop two, two-story commercial buildings rather two, six-story hotel buildings. However, as discussed above, the business park is not a use sensitive to minor transitions in height and scale, and the hotel uses would not be incompatible with commercial uses. Because the Code Compliant Commercial Alternative does not require an underlying zone change and requires fewer CUPs, impacts under this Alternative would be less than those of the Project.

9. Noise

a. On-Site Construction

Under the Code Compliant Commercial Alternative, the duration of construction would be increased compared to the Project. However, the intensity of construction (equipment usage) would be similar on a daily and hourly basis. In comparison, Project construction was determined to result in a potentially significant noise impact at the nearby Best Western Plus Executive Inn hotel (Location R1). Specifically, estimated construction noise levels for all construction phases would exceed the established threshold of 70 dBA. With the implementation of Project Mitigation Measure MM-NOISE-1, which requires the construction of a temporary noise barrier at least 12 feet in height along the southern boundary of active construction within the line-of-sight of the hotel, with noise blankets capable of achieving sound level reductions of at least nine dBA or more in areas, impacts would be reduced to a less than significant level. As the Code Compliant Commercial Alternative would have a similar construction intensity compared to the Project, impacts under this Alternative would be similar to the Project.

b. Off-Site Project Construction Activities

Off-site noise impacts (from hauling, trucking, etc.) related to Project construction were determined to be less than significant. Because the Code Compliant Commercial Alternative would result in similar construction activities, impacts would also be similar to those of the Project.

c. On-Site Operation

The Code Compliant Commercial Alternative would increase the number of visitors to the Project Site, which would increase on-site sources of noise, including that generated by the use of commercial uses. In comparison, Project operation was found to result in less than significant impacts related to on-site activities (use of open space, car alarms, etc.) and on-site equipment. Peak hourly mobile sources of Project-related noise would also increase. However, vehicle trips on-site would be limited (slow) in comparison to on-road travel. Due to the slow speed of vehicle travel on-site, on-site noise sources would be similar to the Project. Operational noise impacts would remain less than significant, as under the Project, but would be similar to those of the Project.

d. Off-Site Operation Activities

As noted above, the Code Compliant Commercial Alternative would increase the number of visitors to the Project Site. In addition, peak hour trips would also be greater, which would increase off-site operational noise impacts. As shown in Table 5-3 below, trip generation under this Alternative would be greater than the Project. The Project would result in an increase in daily and peak hour trips. Noise levels would be increased by approximately 3.9 dBA due to the increase in traffic alone (see Appendix K-1). However, vehicle trips would be dispersed to various roadways which also include existing traffic. Therefore, the increase in trips due to this Alternative would likely yield an increase of less than 3dBA which would remain below significance thresholds. In comparison, Project operation was found to result in less than significant impacts. As the Code Compliant Commercial Alternative would result in more peak hour trips and off-site noise, impacts under this Alternative would be greater than under the Project.

10. Fire Protection and Emergency Services

Construction activities associated with the Code Compliant Commercial Alternative may temporarily increase demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials. However, application of applicable of State and County regulations and LACFD requirements would ensure that impacts on fire protection and emergency medical services would be less than significant. Regarding emergency access and response times, the Code Compliant Commercial Alternative would be required to implement Project Design Feature PDF-TRAF-1 from Section 4.K, Transportation and Parking, which would ensure construction activity and traffic would have a less than significant impact on emergency access and response times in the Project vicinity.

Construction of the Project was determined to result in a less than significant impact based on compliance with applicable regulations, LACFD requirements, and implementation of Project Design Feature PDF-TRAF-1. Construction impacts under the Code Compliant Commercial Alternative would be similar to those of the Project.

Regarding operations, the Code Compliant Commercial Alternative would result in an increase in development and visitors on the Project Site compared to the Project, thus increasing the demand for fire protection services. However, this Alternative would be still required to meet all County fire flow requirements, which would be 4,000 gpm at 20 pounds per square inch (psi) minimum residual pressure for a duration of 4 hours. As stated in Section 4.J.1, Fire Protection and Emergency Services, of this Draft EIR, the Project Site falls within LAFCD's response time goals. Project Design Features PDF-TRAF-2, in Section 4.K, Transportation and Parking, which improves access at the primary Project Site access with appropriate

striping and signaling, would be applicable to the Code Compliant Commercial Alternative as well, thus maintaining emergency response time and access to the Project Site.

The Project was determined to result in a less than significant impact on fire protection and emergency services. The substitution of commercial uses for hotel uses under this Alternative does not materially affect the development proposed and the types of on-site activities. The omission of hotel uses may result in comparatively fewer nighttime service calls, but this could be offset by an anticipated comparative increase in service calls during commercial operating hours. As this Alternative proposes a maximum building height of two stories, there would be a minor reduction in demand because the LACFD would not have to respond to mid-rise buildings. As a result, impacts under the Code Compliant Commercial Alternative would be substantially similar to those of the Project.

11. Sheriff Protection

During construction of the Code Compliant Commercial Alternative, activities due to construction traffic and temporary lane closures associated with utility connections and roadway improvements could potentially affect emergency access to the Project Site and adjacent uses, as well as increase traffic on area roadways and reduce response times. However, the impacts of construction activities would be temporary and short term. This alternative would be required to implement Project Design Feature PDF-TRAF-1, which requires that a Construction Staging and Traffic Management Plan be prepared and submitted to LADPW for review and approval prior to commencement of any construction activity. Project Design Feature PDF-TRAF-1, would minimize disruptions to through traffic flow and reduce the potential for interference with emergency access. In addition, the same security measures would be incorporated as under the Project. The Project was determined to result in a less than significant construction impact to Sheriff protection services with implementation of identified Project Design Features and other security measures, and impacts would be similar to those of the Project.

With respect to operation, the Code Compliant Commercial Alternative would introduce a daytime and, potentially, evening population to the Project Site, compared to the Project's more intensive 24-hour population as the result of hotel development, potentially reducing demand for LASD services compared to the Project. Like the Project, this Alternative could result in traffic impacts that could cause delays in emergency response times; however, Project Design Feature PDF-TRAF-2, which requires the installation of a three-way traffic signal at the main Project driveway and Gale Avenue, would be required under this Alternative and would help maintain adequate response times to the Project Site. Furthermore, emergency response is also routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response.

The Project was determined to result in a less than significant impact to Sheriff protection services through the implementation of on-site security features and Project Design Features, as well as existing adequate response times. However, as the Code Compliant Commercial Alternative represents a more intensive development program than the Project, the number of visitors and workers on the Project Site would be increased, and impacts under this Alternative would be greater than under the Project.

12. Transportation and Parking

a. Intersections

The Code Compliant Commercial Alternative would result in development of two two-story commercial buildings instead of the hotels. As shown in **Table 5-3, Trip Generation: Code Compliant Commercial Alternative**, this Alternative would increase the number of vehicle trips generated on site to a greater extent than the Project. This comparative increase is the result of a relatively high trip generation rate for the high turnover (sit down) style restaurant, of which more floor area is proposed under this Alternative, when compared to hotel uses, which is omitted under this Alternative. Specifically, the Code Compliant Commercial Alternative would result in 25,419 average daily trips, 994 total weekday morning peak hour trips, 2,116 total weekday afternoon peak hour trips, and 2,802 total Saturday mid-day peak hour trips. When compared to the Project trip generation, this Alternative represents 15,062 more average daily trips, or 453 more total weekday morning peak hour trips, 1,270 more total weekday afternoon peak hour trips, and 1,710 more total Saturday mid-day peak hour trips. For purposes of this analysis, pass-by and internal capture rates for commercial and restaurant uses were assumed to be equivalent to the Project.

Table 5-3

**Trip Generation:
Code Compliant Commercial Alternative**

Land Use	Size	Estimated Trip Generation ^a									
		Average Daily Trips ^a	Weekday AM Peak Hour Trips			Weekday PM Peak Hour Trips			Sat Mid-Day Peak Hour Trips		
			In	Out	Total	In	Out	Total	In	Out	Total
Shopping Center	325,969 sf	13,919	196	117	313	580	629	1,209	818	753	1,571
High-Turnover Restaurant	78,103 sf	9,931	465	380	845	462	308	770	473	516	989
Quality Restaurant	78,103 sf	7,025	32	31	63	392	193	585	498	347	845
Office	7,788 sf	26	3	0	3	1	3	4	0	0	0
TOTAL VEHICLE TRIPS		30,901	696	528	1,224	1,435	1,133	2,568	1,789	1,616	3,405
PASS-BY (10%)		(3,090)	(70)	(53)	(123)	(144)	(113)	(257)	(179)	(162)	(341)
COMMERCIAL INTERNAL CAPTURE (5%)		(696)	(10)	(6)	(16)	(29)	(31)	(60)	(41)	(38)	(79)
RESTAURANT INTERNAL CAPTURE (10%)		(1,696)	(50)	(41)	(91)	(85)	(50)	(135)	(97)	(86)	(183)
TOTAL ALTERNATIVE TRIPS		25,419	566	428	994	1,177	939	2,116	1,472	1,330	2,802
TOTAL PROJECT TRIPS		10,357	312	229	541	449	397	846	566	526	1,092
DIFFERENCE		15,062	254	199	453	728	542	1,270	906	804	1,710

^a Source for trip generation rates: *Trip Generation, 9th Edition, Institute of Transportation Engineers (ITE), 2012, Land Use Categories 710,820, and 932.*

Source: Kunzman Associates, Inc., August 2015 (included in Appendix K-2, Trip Generation Worksheets, of this Draft EIR).

Because the Code Compliant Commercial Alternative would result in a comparative increase in vehicle trips, it would exacerbate the significant impacts identified under the Project, and impacts at all intersections would be greater than under the Project. As discussed in Section 4.K, Transportation and Parking, of this Draft EIR, the Project would result in potentially significant impacts at seven intersections under Future (2018) With Project Plus Cumulative Traffic conditions. Improvements already under construction as part of the Nogales Grade Separation Project would eliminate potential Project impacts at two intersections by the

time of Project buildout: Nos. 13 (Nogales Street & San Jose Avenue) and 15 (Nogales Street & Gale Avenue/Walnut Drive). Mitigation Measure MM-TRAF-1 would still be applicable and requires the Project Applicant to pay a fair-share contribution to identified physical improvements at two intersections, Nos. 1 (Fullerton Road & Gale Avenue) and 3 (Fullerton Road & SR-60 Freeway Eastbound Ramps), which would reduce impacts to a less than significant level at those intersections. Project impacts would remain significant and unavoidable at three intersections: Nos. 4 (Fullerton Road & Colima Road), 10 (Nogales Street & La Puente Road), and 18 (Nogales Street & Colima Road), as these intersections are fully built out and would require right-of-way acquisition to implement improvements, which the County has determined is infeasible.

As shown in **Table 5-4, Alternative 3: Code Compliant Commercial Alternative Future (2018) With Alternative Plus Cumulative Traffic Conditions Service Levels for Affected Signalized Intersections**, when this Alternative's comparatively greater vehicle trips are added to the intersections significantly impacted by the Project, impacts are further exacerbated at these intersections. As shown in Table 5-4, the significant and unavoidable impacts would be worsened in terms of V/C ratios. The Code Compliant Commercial Alternative would be required to implement Project Mitigation Measure MM-TRAF-1, which requires the Project Applicant to pay a fair-share contribution towards identified physical improvements at two intersections, Nos. 1 and 3, and, as under the Project, Nogales Street Grade Separation Project improvements at Intersection Nos. 13 and 15 would eliminate potential impacts at these intersections. However, significant and unavoidable impacts would remain at Intersection Nos. 4, 10, and 18, as under the Project, since no mitigation is feasible at these locations. This Alternative would therefore result in greater impacts to study area intersections than the Project, even with mitigation.

b. Congestion Management

As discussed above, the Code Compliant Commercial Alternative would result in a greater number of vehicle trips than the Project. However, the nearest CMP intersection (Azusa Avenue and Colima Road) is located 2.2 miles southwest of the Project Site, and when considering trip distribution through the roadway network, this Alternative would not add 50 or more vehicle trips to the intersection during either the morning or afternoon peak hours. Therefore, the Code Compliant Commercial Alternative would result in a less than significant impact. However, because the Code Compliant Commercial Alternative would result in a greater number of trips at the intersection, impacts under this Alternative would be greater than under the Project.

c. Traffic Hazards

The Code Compliant Commercial Alternative would introduce an ingress/egress driveway and signalized intersection on the proposed parcel boundary between Parcel 1 and Parcels 2 and 3, which would serve as the primary Project Site entrance, and a new ingress/egress driveway into Parcels 2 and 3 along the western Project Site boundary, both of which would be designed in accordance with applicable design standards. Proposed accesses and circulation would be reviewed by LACDPW Traffic and Lighting Public Works Road Division with respect to Caltrans/Los Angeles County standards to ensure that this Alternative does not substantially increase hazards due to a design feature. The County would also periodically review traffic operations in the Project vicinity once the Project is constructed to ensure that traffic operations are satisfactory. Therefore, impacts under the Code Compliant Commercial Alternative would be less than significant.

Table 5-4

**Alternative 3: Code Compliant Commercial Alternative
Future (2018) With Alternative Plus Cumulative Traffic Conditions
Service Levels for Affected Signalized Intersections**

ID	N/S Street Name	E/W Street Name	Peak Period	Existing (2013)		Future (2018) With Alternative Plus Cumulative			
				V/C	LOS	Without Improvements			
						V/C	LOS	Alt. 3 Impact	Sig Impact
1	Fullerton Rd	Gale Ave	A.M.	0.657	B	0.683	B	0.026	No
			P.M.	0.649	B	0.817	D	0.168	YES
			SAT	0.792	C	1.006	F	0.214	YES
3	Fullerton Rd	SR-60 Fwy EB Ramps	A.M.	0.663	B	0.732	C	0.069	YES
			P.M.	0.657	B	0.790	C	0.133	YES
			SAT	0.847	D	1.013	F	0.166	YES
4	Fullerton Rd	Colima Rd	A.M.	0.773	C	0.794	C	0.021	No
			P.M.	0.825	D	0.846	D	0.021	YES
			SAT	0.841	D	0.916	E	0.075	YES
9	Nogales Street	Shadow Oak Dr	A.M.	0.666	B	0.727	C	0.061	YES*
			P.M.	0.518	A	0.645	B	0.127	No
			SAT	0.522	A	0.683	B	0.161	No
10	Nogales St	La Puente Rd	A.M.	0.818	D	0.868	D	0.050	YES
			P.M.	0.774	C	0.856	D	0.082	YES
			SAT	0.774	C	0.887	D	0.113	YES
13	Nogales St	San Jose Ave	A.M.	0.641	B	0.675	B	0.034	No
			P.M.	0.896	D	0.884	D	-0.012	No
			SAT	0.569	A	0.654	B	0.085	No
15	Nogales St	Gale Ave/ Walnut Dr	A.M.	0.820	D	0.951	E	0.131	YES
			P.M.	1.125	F	1.468	F	0.343	YES
			SAT	1.002	F	1.664	F	0.662	YES
16	Nogales St	SR-60 Fwy WB Ramps	A.M.	0.647	B	0.700	B	0.053	No
			P.M.	0.630	B	0.723	C	0.093	YES*
			SAT	0.631	B	0.800	C	0.169	YES*
17	Nogales St	SR-60 Fwy EB Ramps	A.M.	0.549	A	0.574	A	0.025	No
			P.M.	0.684	B	0.727	C	0.043	YES*
			SAT	0.596	A	0.654	B	0.058	No
18	Nogales St	Colima Rd	A.M.	0.810	D	0.842	D	0.032	YES
			P.M.	0.720	C	0.777	C	0.057	YES*
			SAT	0.825	B	0.909	E	0.084	YES

* Indicates a new potentially significant impact that would not occur under the Project.

Source: Kunzman Associates, Inc., December 2015 (provided in Appendix K-2, Trip Generation Worksheets, of this Draft EIR).

The Project proposes a nearly identical circulation plan, with the above-described access driveways being implemented under the Project as well. The access driveways would be designed in accordance with applicable design standards and reviewed by LACDPW Traffic and Lighting Public Works Road Division,

resulting in a less than significant impact. As a result, impacts to with regard to traffic hazards under the Code Compliant Commercial Alternative would be similar to the Project.

d. Emergency Access

Construction of the Code Compliant Commercial Alternative, and construction-related activities would be required to implement Project Design Feature PDF-TRAF-1, which requires implementation of a Construction Staging and Traffic Management Plan. With implementation of Project Design Feature PDF-TRAF-1, construction impacts to emergency access under this Alternative would be less than significant.

Similarly, the Project would also result in a less than significant impact to emergency access during Project construction with the implementation of Project Design Feature PDF-TRAF-1. Because the Code Compliant Commercial Alternative proposes a similar amount of development, the overall duration and number of construction vehicles would be materially the same. As a result, construction impacts under this Alternative would be similar to the Project.

With respect to operation, the County would review this Alternative's design plans to ensure the deployment of fire equipment or other services under emergency conditions, among other access provisions, would be adequate for this Alternative in accordance with LACC, Title 21, Subdivisions, Chapter 21.24, Design Standards, Part 1, Access, Section 21.24.010, General Requirements. This alternative's access drives and internal private drives would be designed to meet the County and LACFD standards, incorporating any revisions requested by LACDPW. Therefore, operation of the Code Compliant Commercial Alternative would result in a less-than-significant impact to emergency access.

Similarly, the Project's operational impacts to emergency access would be less than significant through appropriately designed access and internal circulation, as reviewed and approved by the County. However, the Code Compliant Commercial Alternative would result in a greater number of trips, potentially reducing response times and creating additional congestion at Project accesses. As a result, operational impacts under the Code Compliant Commercial Alternative would be greater than under the Project.

e. Plan and Policy Consistency

Because commercial land uses have a higher parking demand than hotel uses, this Alternative would be required to provide 3,232 parking spaces under the County Parking Code (compared to a Code requirement of 1,503 parking spaces under the Project). As a result, the Code Compliant Commercial Alternative would require a greater number of subterranean parking spaces, which would be provided in a greater number of subterranean parking levels. To account for variations in parking demand that occur throughout the day, shared parking would likely occur because land uses have peak parking demands at different times of day, or on different days of the week, in which case the maximum number of spaces required at the peak period is less than the sum of that required by the County Parking Code for each of the individual land uses. As a result, the Code Compliant Commercial Alternative presumably would involve a Parking Permit for the provision of on-site parking spaces. Further, because restaurant floor plans have not yet been developed, this Alternative would also be required to implement Project Design Feature PDF-TRAF-3, which establishes a maximum occupant load for restaurant uses and controls restaurant occupancy restrictions through the Commercial Center Association's Covenants, Conditions and Restrictions (CC&R). With County approval of a Parking Permit and implementation of Project Design Feature PDF-TRAF-3, this Alternative would result in a

less than significant impact to parking. The Code Compliant Commercial Alternative would also be consistent with all adopted plans, policies, and programs supporting alternative transportation by locating a commercial/hotel project within close proximity to existing transit options and improving pedestrian connections in the immediate Project vicinity.

The Project was determined to result in a less than significant impact to parking by providing adequate parking in accordance with LACC requirements and requesting County approval of a Parking Permit as part of the entitlements. Further, the Project would result in a less than significant impact to plan and policy consistency by improving pedestrian connections and supporting transit options by developing a Project within proximity to mass transit options and developing pedestrian connections. However, because the Code Compliant Commercial Alternative would generate increased demand for parking compared to the Project, parking-related impacts under this Alternative would be greater than under the Project.

13. Wastewater

a. Wastewater Collection

During construction, existing on-site sewer lines currently serving other uses (the 10- to 12-inch VCP located in the northernmost portion of the Project Site) would be preserved in place. Furthermore, no deep excavations are proposed in the area of this existing sewer line, so there would not be a substantial potential to damage this sewer line during Project construction. As a result, construction of the Code Compliant Commercial Alternative would not disrupt sewer services. Construction of the Project was determined to result in a less than significant impact to wastewater collection because no off-site service would be disrupted. As a result, construction impacts under this Alternative would be similar to those of the Project.

Regarding operation, as shown in **Table 5-5, Sewage Generation: Code Compliant Commercial Alternative**, this Alternative would generate an estimated total average sewage flow rate of 0.3319 cfs (which translates to a daily average flow of 214,504.5 gpd) and a total peak sewage flow of 0.830 cfs. This sewerage flow would be accommodated by the LACCSMD 12-inch sewer line, which flows from the northwest corner of the Project Site to the 30-inch Sanitation District trunk sewer. With this Alternative's contribution to wastewater flows, the 12-inch sewer line would operate at above 50 percent full (specifically, 137 percent of capacity) under existing plus alternative conditions. However, because LACDPW design criteria permit sewer lines to operate at 150 percent of capacity, the downstream wastewater collection system has adequate capacity to accommodate the sewage to be generated by the Code Compliant Commercial Alternative. Furthermore, this Alternative would pay the required sewer connection fees to help defray Sanitation District costs for providing sewer conveyance for the proposed Project. Therefore, impacts would be less than significant. In comparison, operation of the Project would generate an estimated total average sewage flow rate of 0.1998 cfs (which translates to a daily average flow of 129,153 gpd) and a total peak sewage flow of 0.4996 cfs. Accordingly, the Code Compliant Commercial Alternative represents an increase in the daily average flow and total peak flow by 0.1321 cfs (85,378 gpd) and 0.3304 cfs, respectively. According to the capacity analysis in the Sewer Capacity Study, the LACCSMD's 12-inch sewer line from the northwest corner of the Project Site to the 30-inch Sanitation District trunk sewer would operate at above 50 percent full (specifically, 119 percent of capacity) under existing plus Project conditions. However, because LACDPW design criteria permit sewer lines to operate at 150 percent of capacity, the downstream wastewater collection system has adequate capacity to accommodate the sewage to be generated by the Project. Because the Code

Table 5-5

**Sewage Generation:
Code Compliant Commercial Alternative**

Business Name	Occupancy	Quantity	Sewage Generate Factor	Flow Rate		
				Average (gpm)	Average (cfs)	Peak (cfs)
Restaurant/Food Service	Restaurant	3,607 seats ^a	50/seat	125.27	0.2791	0.6980
Retail	Commercial Shops & Stores	325,969 SF	100/1000 SF	22.64	0.0504	0.1260
Office	Office	7,788 SF	200/1000 SF	1.08	0.0024	0.0060
Alternative 3 Total				148.99	0.3319	0.8300
Project Total				89.69	0.1998	0.4996
Difference				59.30	0.1321	0.3304

^a Number of seats based on parking requirements of County of Los Angeles based on floor area (net).

Source: PCR Services Corporation, August 2015

Compliant Commercial Alternative would result in higher wastewater flows from the Project Site than the Project, impacts under this Alternative would be greater than under the Project.

b. Wastewater Treatment

The Code Compliant Commercial Alternative’s wastewater generation would be an estimated 148.99 gpm, or approximately 0.215 mgd. As indicated in Section 4.L.1, Wastewater, the San Jose Creek WRP has an existing treatment capacity of 100 mgd and currently treats an average daily flow of 71.3 mgd. Based on these numbers, the San Jose Creek WRP has a remaining unused treatment capacity of approximately 28.7 mgd. As a result, the Code Compliant Commercial Alternative represents a negligible portion (approximately 0.75 percent) of the remaining capacity at the WRP, and a less than significant impact would result.

In comparison, the Project’s wastewater generation would be an estimated 89.69 GPM, or approximately 0.108 mgd. Therefore, the Code Compliant Commercial Alternative represents an increase of 59.30 gpm, or 0.107 mgd, over the Project. The Project’s contribution was determined to represent a negligible proportion (approximately 0.4 percent) of the remaining unused treatment capacity of the San Jose Creek WRP, and the Project was determined to result in a less than significant impact to wastewater treatment. As the Code Compliant Commercial Alternative would generate more wastewater flows than the Project, impacts under this Alternative would be greater than under the Project but less than significant as noted above.

14. Water Supply

a. Construction

The Code Compliant Commercial Alternative would require construction of a new on-site sanitary water and fire water conveyance system (e.g., pipelines) and the connection of this system to the existing 12-inch water pipeline in the Gale Avenue right-of-way. No active water lines serving adjacent properties bisect the Project Site, so there would be no potential to interrupt water service to adjacent properties (such as due to inadvertent damage of existing lines) during construction. Similarly, Project construction impacts were

determined to be less than significant because no water supply lines bisect the Project Site and no disruption of service would occur. As a result, impacts under this Alternative would be similar to those of the Project.

b. Water Supply

The Code Compliant Commercial Alternative would increase on-site water demand by estimated 240 AFY of potable water at buildout in 2020. When considering this Alternative, water demand within the RWD would increase from 13,484 AFY to 13,724 AFY. Because this would be within RWD's potable water supply between the years of 2020 and 2025 (13,500 AFY and 14,700 AFY, respectively), it is anticipated that adequate potable water supply would be available to serve this Alternative. Similarly, with the addition of the nonpotable water demand of 49 AFY for this Alternative by buildout in 2020 (for landscape irrigation)¹⁴, nonpotable water demand within the RWD would increase from 5,000 AFY to 5,049 AFY. Because this would fall within the RWD's 2020 nonpotable water supply of 6,200 AFY, adequate nonpotable water supply would be available to serve this Alternative.

Similarly, the increase in water demand associated with the Project was determined to be within the RWD's potable water supply between the years of 2020 and 2025 and within the RWD's 2020 nonpotable water supply, and a less than significant impact would result. When compared to the Project, the Code Compliant Commercial Alternative represents a comparative increase in potable water supply of 95 AFY and a comparative in nonpotable water supply of 34 AFY. As a result, impacts under the Code Compliant Commercial Alternative would be greater than under the Project.

C. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The ability of the Code Compliant Commercial Alternative to achieve the underlying Project purpose and specific Project Objectives, presented in Chapter 2.0, Project Description, of this Draft EIR, is summarized in Subsection 5.E, below. As shown therein, because it does not provide any hotel uses, this Alternative would only partially achieve the underlying Project purpose and primary objective: to provide for the development of a high quality, integrated development of complementary commercial retail establishments and hotels that promotes economic growth and job creation within a commercial and light industrial corridor developed with compatible uses.

Because the Code Compliant Commercial Alternative could provide a larger commercial center than proposed under the Project, with the same mix and relative proportion of uses, it would achieve all five of the Project's Commercial/Retail Objectives.

However, because this Alternative would eliminate the Project's proposed hotel uses, it would not achieve any of the five Hotel Objectives.

Because it would eliminate hotel uses and develop the entire Project Site with purely commercial uses (retail, restaurant, and office), this Alternative would not achieve the Project's Siting and Design Objective No. 1: to create an activity node and ensure a high level of pedestrian activity during the day and evening by

¹⁴ Project water demand represents 120 percent of estimated Project wastewater generation to account for irrigation water landscaping that would not re-enter the sewer system. As with the Project, the 20 percent used for irrigation was assumed to be recycled, nonpotable water.

collocating a sufficiently diverse concentration of uses with a complementary peak period. This alternative would fully achieve the remaining four Siting and Design Objectives.

The Project's proposed hotels and interconnected walkways are intended to support the economic viability of the Commercial Center. With the elimination of the proposed hotels and development solely of commercial uses, the Code Compliant Commercial Alternative would not achieve Economic and Employment Objective No. 1, which is to create a viable mix of complementary retail, office, and hotel uses, to create internal synergy and attract outside patrons. With the elimination of the hotels, this Alternative would only partially achieve the remaining two Economic and Employment Objectives, which are to contribute to the economic health of the Rowland Heights community through the creation of long-term professional as well as service employment opportunities, and to generate revenue for the County through net new sales and room taxes.

D. CONCLUSION

The Code Compliant Commercial Alternative would not avoid, and would actually exacerbate, the Project's unavoidable significant operational air quality and intersection impacts because of the large amount of development that would be permitted on the Project Site by right. The Code Compliant Commercial Alternative would also result in new significant and unavoidable GHG emissions impacts, compared to the Project's less than significant GHG emissions impacts. Odor impacts, operational Sheriff protection impacts, and operational wastewater and water supply impacts would also be greater. Only aesthetic impacts related to visual character and shading and land use impacts related to compliance with County plans and policies and LACC compliance (consistency with underlying zoning) would be less than those of the Project. The remaining construction-related and operational impacts under this Alternative would be similar to those of the Project.

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5.0 ALTERNATIVES

D. ALTERNATIVE 4: CODE COMPLIANT LIGHT INDUSTRIAL/WAREHOUSE ALTERNATIVE

A. DESCRIPTION OF THE ALTERNATIVE

The Code Compliant Light Industrial/Warehouse Alternative would result in development of the Project Site in conformance with its underlying land use designation and zoning regulations. The Project's requested Zone Change (from M-1.5 to C-3-[DP]) for Parcels 2 and 3 would not be sought, and the entire portion of the Project Site within the unincorporated County would remain in the M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion) zone.

Since hotel uses are prohibited in the M-1.5 zone, they are not proposed under this Alternative. The entire portion of the Project Site within the unincorporated County would be developed with light industrial and warehouse uses permitted in the M-1.5 zone. Since this Alternative proposes light industrial and warehouse uses similar to that of the light industrial parks in the Project vicinity, the provision of consumer-oriented commercial uses is not considered. This alternative would subdivide of the portion of the Project Site within the unincorporated County into six parcels, one associated with each of the six light industrial/buildings proposed to allow private ownership of these parcels. All six parcels would continue be zoned M-1.5-BE and would be developed in a single phase. CC&Rs would be established to unify the proposed development and to regulate the maintenance of common circulation and landscaped areas, as approved by the County.

The Code Compliant Light Industrial/Warehouse Alternative assumes floor area provided up to the maximum permitted in the M-1.5 zone in the Rowland Heights CSD. For commercial and industrial land uses, the CSD establishes a maximum permitted lot coverage of 40 percent. When applied to the 14.06-acre (612,454 square-foot) portion of the Project Site within the unincorporated County, the light industrial and warehouse buildings would be permitted a footprint of 244,982 square feet. Similar to other light industrial parks in the Project vicinity, buildings would be one story in height. To allow flexibility in development and occupancy, light industrial and warehouse uses would each occupy 50 percent of total floor area, or 122,491 square feet each. The portion of the Project Site within the City of Industry would be developed with 75 parking spaces, or alternatively, remain paved but unstriped to facilitate the wider turning movements of trucks associated with light industrial and warehouse uses.

Six light industrial/warehouse buildings would be developed in place of the commercial and hotel buildings proposed under the Project. The maximum building height for all buildings proposed under this Alternative would not exceed the CSD established height of 45 feet above grade (LACC Section 22.44.132(D)(4)). The proposed locations of loading docks on the buildings would be roughly the same as under the Project. Loading dock dimensions would adhere to LACC Section 22.52.1084 (Loading Areas).

The Code Compliant Light Industrial/Warehouse Alternative would provide 367 parking spaces throughout the Project Site.¹⁵ Due to the relatively low parking demand for uses assumed under this Alternative, all

¹⁵ County code requires 245 spaces for the proposed light industrial uses (1/500 sf) and 122 spaces for the proposed warehouse uses (1/1,000 sf)

parking would be accommodated in surface parking lots. As with the Project, all parking spaces would be full size, with no compact spaces planned. Adequate provisions for truck parking would be provided. In contrast to the Project, a Parking Permit would not be sought under the Code Compliant Light Industrial/Warehouse Alternative. Because less fill and no subterranean parking is proposed under this Alternative, construction would require less grading and soil export compared to the Project.

Other components of the Code Compliant Light Industrial/Warehouse Alternative would be similar to the Project. Driveway locations would remain as proposed under the Project, with minor modifications at the location of the Project's hotel entrances. Pedestrian walkways would continue to connect buildings internal to the Project Site and off-site commercial uses; sidewalk improvements, a landscaped setback, and ADA-accessible access would continue to be provided along Gale Avenue. Some centrally located gathering common area would still be proposed, although landscaping would be minimized in response to lack of commercial patrons anticipated on the Project Site. In contrast to the Project, no CUP would be requested to authorize a commercial shopping center containing more than three business establishments; however, a Drainage Concept Review would continue to be required for the channelization for the undergrounding of the on-site channel. The channelization would also continue to require USACE, CDFW, and RWQCB permits.

B. ENVIRONMENTAL IMPACTS

1. Aesthetics

a. Visual Character

During construction, the demolition, grading, and construction of new buildings, sidewalk improvements, and installation of landscaping would be visually disruptive while these activities occur. However, because of the relatively short-term nature of construction, the use of construction fencing which would partially screen construction activities. Given the absence of visual resources on the Site and surrounding area, construction activities under the Code Compliant Light Industrial/Warehouse Alternative would result in a less than significant impact on the existing visual character of the Project Site. Similarly, construction of the Project was determined to result in a less than significant impact on visual character due to the limited duration of construction and the use of screening. As a result, impacts under this Alternative would be similar to the Project.

The Code Compliant Light Industrial/Warehouse Alternative would introduce six one-story light industrial and warehouse buildings to the Project site. The one-story buildings would be substantially visually consistent with the numerous low-rise light industrial and warehouse uses in the vicinity. The proposed buildings would incorporate modern architectural character and high-quality building materials. The articulation of exterior facades, installation of landscaping along Gale Avenue, and building setbacks would be consistent with the commercial frontage along Gale Avenue. Surface parking would be screened from view through the use of landscaping. Signs would be placed on building walls and would not be located on the rooftops. All utility lines would be located below ground. Because similar commercial and light industrial development and SR-60 are located in the immediate and surrounding vicinity, the Code Compliant Light Industrial/Warehouse Alternative would not substantially change the existing developed character of the area. Rather, components of this Alternative would contribute positively to the character of the area, including the provision of streetscape and architecturally interesting building features on a currently undeveloped parcel.

With regard to aesthetic compatibility, the Project Site is separated from the nearest residential use by a distance of more than 300 feet, and the proposed buildings would not contribute prominently to the viewshed from these homes, if they would be visible at all. SR-60 would continue to be the most immediately visible feature from these residences. Also, because this Alternative would consist of a high-quality architectural design, it would not substantially degrade the aesthetic character of the Site and surroundings. The proposed buildings would maintain required setbacks from adjacent uses, which are compatible in scale to the light industrial and warehouse buildings proposed. Therefore, the Code Compliant Light Industrial/Warehouse Alternative would result in a less than significant impact to visual character.

Similarly, the Project was determined to result in a less than significant impact to visual character. However, the Project proposes two six-story hotels which would be more visually prominent within the existing low-rise development. As discussed in Section 4.A, Aesthetics, of this Draft EIR, while the height of the two hotel buildings could contrast with the existing low-rise setting of the area, the Project's design and location were determined to be compatible with the surrounding commercial and industrial development, resulting in less than significant impacts. Because the six-story hotels would be replaced with low-rise one-story light industrial and warehouse buildings, impacts under the Code Compliant Light Industrial/Warehouse Alternative would be less than under the Project.

b. Light and Glare

As discussed in Section 4.A, Aesthetics, of this Draft EIR, nighttime lighting is generated by vehicle traffic on SR-60, illuminated signage and pole signs, commercial signage, and building and security lighting. Because of existing high levels of ambient light, any artificial light associated with construction activities would not significantly impact residential uses in a manner that would adversely affect nighttime views or substantially alter the character of the uses surrounding the construction area, and a less than significant impact would result. Similarly, Project construction was determined to result in a less than significant impact because of relatively high existing ambient light conditions. As a result, impacts under the Code Compliant Light Industrial/Warehouse Alternative would be similar to those of the Project.

During operation, illuminated signage and other lighting (e.g., parking security, landscaping) associated with this Alternative may be considered a potential source of nighttime glare or ambient lighting. Light-sensitive land uses in the area include the hotel directly south of the Project Site and residential uses south of SR-60. However, no point sources of light representing a great contrast from surrounding ambient light conditions would be directed toward the roadways or these sensitive uses. The intensity of light emanating from proposed signs would also be regulated by the Rowland Heights CSD, which requires a sign program to be submitted for approval by the Director of Planning. With regard to glare, the exterior building façades would be composed of materials unlikely to cause any kind of glare impact due to light reflection.

The Project's proposed commercial signage, parking lot lights, and visible interior illumination were not considered to be a substantive source of new lighting given the area's existing industrial and commercial uses, which in combination with area roadways and billboards/signage, already generate relatively high levels of ambient lighting, and impacts were determined to be less than significant. The Project was also determined to result in a less than significant glare impact because building materials were unlikely to cause any kind of glare impact. Because the Code Compliant Light Industrial/Warehouse Alternative would develop the Site less densely, with fewer tenants, it would likely require less signage than the Project, and light and glare impacts would be less than under the Project.

c. Shading

The Code Compliant Light Industrial/Warehouse Alternative would limit development to one story in height. Given the absence of the shadow sensitive uses in the immediate vicinity and this Alternative's adherence to applicable setbacks, building shadows would not result in significant shading impacts, if shadows extend beyond the property boundary at all between the hours of 9:00 A.M. and 5:00 P.M.

In comparison, the Project was determined to result in a less than significant impact with regard to shade/shadow. Because the Code Compliant Light Industrial/Warehouse Alternative proposes only one-story buildings, impacts under this Alternative would be less than under the Project.

2. Air Quality

a. Consistency of the Project with Applicable Plans and Policies

Regarding construction, construction jobs under the Code Compliant Light Industrial/Warehouse Alternative are relatively small in number and temporary in nature, and this would not conflict with the long-term employment projections upon which the AQMP is based. In addition, construction of this Alternative would not conflict with implementation of strategies to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. Construction of the Code Compliant Light Industrial/Warehouse Alternative would also be required to comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403. As a result, the Code Compliant Light Industrial/Warehouse Alternative would be consistent with applicable plans and policies, and a less than significant impact would result.

Similarly, construction of the Project was determined to result in a less than significant impact because it would not conflict with long-term employment projections, would not interfere with plans to replace older construction equipment, and would comply with applicable SCAQMD regulations. Construction activities under this Alternative would be reduced in scale compared to the proposed Project. However, pollutant emissions and fugitive dust from Site preparation and construction activities would be similar on a daily basis, as the duration and not the intensity of these activities could decrease compared to the proposed Project. As regional construction air quality impacts are evaluated on a worst-case (maximum) day, impacts would be similar to the proposed Project. As with the Project, construction impacts under this Alternative would be less than significant.

With regard to operation, the Project was determined to result in a less than significant impact because it would be consistent with the growth projections as contained in the County and City's General Plans and thus be consistent with the growth projections in the AQMP. Further, the Project would be consistent with Transportation Control Measures that are intended to reduce regional mobile source emissions by reducing vehicle trips for patrons and employees and increasing the concentration of commercial development near public transit. Because the Code Compliant Light Industrial/Warehouse Alternative would represent a reduction in the amount of overall development proposed compared to the Project and would be located an equal distance to transit options, impacts under this Alternative would be less than under the Project.

b. Violation of Air Quality Standards

Although the Code Compliant Light Industrial/Warehouse Alternative would result in less development, this Alternative could result in construction which, on the basis of the most productive/highest activity day, is expected to be the same as the Project. Construction activities would be incrementally less than under the proposed Project due to the reduction square footage developed under this Alternative. The overall amount of Site preparation and building construction would be less under the Code Compliant Light Industrial/Warehouse Alternative than under the Project.

As discussed above, pollutant emissions and fugitive dust from Site preparation and construction activities would be similar on a daily basis, as the duration but not the intensity of these activities could decrease compared to the proposed Project. The construction emissions generated by the Code Compliant Light Industrial/Warehouse Alternative would be less than those of the proposed Project over the construction period. Regional construction impacts under worst-case conditions (those used for measuring significance) would be similar to those of the proposed Project on a daily basis and would be less than significant. Localized pollutant construction impacts would also be less than those of the Project, as the intensity and duration of excavation would be reduced due to elimination of subterranean parking, and would also be less than significant.

With regard to Project operation, emissions exceed the applicable mass thresholds of significance for VOC and NO_x during full buildout and interim operations (overlap of Phase 1 development in combination with the ongoing construction emissions from Phase 2 construction). As a result, operation of the Project would potentially result in emissions that lead to a violation of an air quality standard or contribute substantially to an existing or projected air quality violation; thus, operational impacts would be potentially significant. Due to the reduction in vehicle trips under this Alternative, operational emissions under this Alternative would be reduced in comparison to the Project. However, the Code Compliant Light Industrial/Warehouse Alternative would result in more heavy-duty truck trips compared to the Project due to warehousing and light industrial land uses. As heavy-duty diesel trucks generate more NO_x emissions than light duty autos/trucks, operational NO_x emissions would be greater than the Project. Because the Code Compliant Light Industrial/Warehouse Alternative would result in less development and fewer vehicle miles associated with long-term operations, emissions of criteria pollutants would be reduced, except for NO_x. As shown in Appendix K-1, VOC would be 17 lbs/day, which represent a reduction of 69 percent compared to the Project which would result in emissions lower than the SCAQMD mass emission threshold. By contrast, NO_x emissions would increase by 49 percent to 113 lbs/day, which exceeds the relevant threshold, similar to the proposed Project. As a result, although the Code Compliant Light Industrial/Warehouse Alternative would also result in potentially significant operational impacts with regard to NO_x emissions, the impacts would be similar to the Project. Impacts under this Alternative would be similar for construction and operational emissions to those of the Project.

c. Nonattainment Pollutants

The Los Angeles County portion of the Air Basin is designated nonattainment for the ozone and PM_{2.5} NAAQS and nonattainment for the ozone, NO₂, PM₁₀, and PM_{2.5} CAAQS. Construction of the Project was determined to result in a less than significant impact because Project construction would occur in accordance with CARB and SCAQMD control measures so that construction emissions from the Project would not exceed SCAQMD significance thresholds. As discussed above, construction of the Code Compliant Light Industrial/Warehouse Alternative would result in lower overall emissions, but on a daily basis emissions would be similar to the

Project. Therefore, as with the Project, construction of the Code Compliant Light Industrial/Warehouse Alternative would result in a less than significant impact.

Project operations would exceed the threshold of significance for VOC and NO_x during interim operations when combined with ongoing construction emissions as well as full buildout. Even with the implementation of Project Design Features to meet the requirements of LEED® Silver, impact would remain because the majority of emissions associated with the operation of the Project would be from vehicles accessing the Project Site. The Code Compliant Light Industrial/Warehouse Alternative would result in fewer vehicle trips but would have a vehicle mix with higher emission factors due to warehouse truck trips. This alternative would still exceed the threshold of significance for NO_x and would also have potentially significant operational impacts. As a result, impacts under the Code Compliant Light Industrial/Warehouse Alternative would be similar to the Project.

d. Substantial Pollutant Concentrations

When determining localized air quality impacts under the Code Compliant Light Industrial/Warehouse Alternative, it is useful to compare them to the Project since the Project provides a baseline of known impacts. As shown in Table 4.B-6, *Maximum Unmitigated Localized Construction Emissions*, and Table 4.B-7, *Maximum Unmitigated Localized Operational Emissions – Interim and Build*, in Section 4.B, Air Quality, of this Draft EIR, Project construction and operations were determined to result in a less than significant localized impact to substantial pollutant concentrations, even when considering the interim construction of Phase 2 while Phase 1 is operational; the phases together would not generate emissions that exceed allowable localized thresholds for these pollutants. As the Code Compliant Light Industrial/Warehouse Alternative would have a shorter construction schedule and reduced overall program of development when compared to the Project, impacts under this Alternative would be less than significant. However, as discussed above, construction activities and emissions on a daily basis under this Alternative would be similar to the Project.

As with localized air quality impacts, the Project provides a good baseline on which to compare impacts under the Code Compliant Light Industrial/Warehouse Alternative. The Project was determined to result in a less than significant impact to CO hotspots at study area intersections. Baseline CO levels in the Project area were found to be substantially below federal and State standards. The Project would not cause or contribute to the formation of CO hotspots, and CO concentrations at Project-impacted intersections would remain well below the ambient air quality standards. The Code Compliant Light Industrial/Warehouse Alternative would result in fewer peak hour trips, which would also result in lower CO concentrations at Project impacted intersections. Therefore, as the Code Compliant Light Industrial/Warehouse Alternative represents a reduced peak hour trip generation and overall program of development when compared to the Project, impacts under this Alternative would be less than significant and less than those associated with the Project.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, automotive repair facilities, and dry cleaning facilities. The Code Compliant Light Industrial/Warehouse Alternative would include light industrial and warehouse uses and due to truck traffic, would generate diesel particulate matter and VOCs in addition to emissions during construction and operation. When considering the release of the materials into the atmosphere, the Project is a good baseline of comparison. It was determined that the Project would result in a less than significant impact with regard to TACs because of required compliance with the CARB Air Toxics Control Measure that limits the idling of diesel-powered

equipment and vehicle to no more than five minutes at a location. Also, the Project would utilize incidental amounts of toxic substances such as oils, solvents, and paints in accordance with applicable SCAQMD rules for their manufacture and use; and would comply with SCAQMD Rule 1403 requirements if asbestos is found during construction. Although the Code Compliant Light Industrial/Warehouse Alternative represents a reduction in overall construction and development program, it would emit an increased quantity of TACs from warehouse diesel truck trips and potential emissions from light industrial processes, although such operations would be assumed to comply with AQMD's applicable regulations. However, the number of truck trips and distance to sensitive receptors under this Alternative would not likely result in a significant impact with regard to operational TACs. Therefore, construction impacts with regard to TACs would be less than significant and less than under the Project, while operational impacts would also be less than significant, but greater than under the Project.

e. Odors

Potential activities that may emit odors during construction activities include the use of architectural coatings and solvents and the combustion of diesel fuel in on- and off-road equipment. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Although some odor-generating manufacturing uses could be permitted within the M-1.5 zone, the Code Compliant Light Industrial/Warehouse Alternative proposes light industrial and warehouse uses which would not introduce land uses typically associated with odor complaints. Construction and operation of the Code Compliant Light Industrial/Warehouse Alternative would not generate substantial odorous emissions. Construction equipment would comply with CARB anti-idling regulations to minimize diesel emissions. Architectural coatings would comply with CARB and SCAQMD regulations regarding VOC content. As a result, this Alternative would not create objectionable odors affecting a substantial number of people, and impacts would be less than significant.

Similarly, the Project would result in a less than significant construction and operational impact to odors because it also would not introduce land uses associated with odor complaints and use compliant architectural coatings, with compliance with applicable AQMD regulations. However, because this Alternative would result in a reduction in the construction schedule and overall development, including the number of refuse collection areas, impacts under this Alternative would be less than under the Project.

3. Biological Resources

a. Special Status Species

The Code Compliant Light Industrial/Warehouse Alternative would underground the existing on-site channel and require removal of the single southern California black walnut (CNPS Rank 4) within the northern drainage channel. However, the CNPS Rank 4 is a low-level watch list sensitivity, and removal of one specimen from a highly disturbed location would not be considered an adverse effect to the species. Therefore, the Code Compliant Light Industrial/Warehouse Alternative would result in a less than significant impact on special status species.

Similarly, the Project was determined to result in a less than significant impact to special status species because the removal of one California black walnut from a highly disturbed location would not be considered

an adverse effect to the species. Since the Code Compliant Light Industrial/Warehouse Alternative would also result in removal of this specimen, impacts under this Alternative are similar to the Project.

b. Sensitive Plant Communities

The Code Compliant Light Industrial/Warehouse Alternative would develop the Project Site producing a site plan and building layout similar to that of the Project, including paving the portion of the Project Site within the City of Industry to provide parking or accommodate the turning movements of trucks. This alternative would result in the removal of on-site vegetation; however, while plant communities dominated by willows are identified as sensitive habitats by CDFW, the Project Site supports only a few willow trees within the existing channel, which in the past have periodically been removed to allow unimpeded flow within the northern drainage channel. The vegetation on site does not comprise a sensitive plant community; therefore, impacts under this Alternative would be less than significant.

Similarly, removal of existing on-site vegetation under the Project, including willow community in the existing channel, was determined to result in a less than significant impact to sensitive plant communities. Since the Code Compliant Light Industrial/Warehouse Alternative would remove vegetation and underground the existing channel, impacts under this Alternative would be similar to the Project.

c. Jurisdictional Resources

The Code Compliant Light Industrial/Warehouse Alternative would underground the existing on-site channel to pave the portion of the Project Site within the City of Industry for additional parking or to accommodate truck movements. This is considered a potentially significant impact to jurisdictional waters of the U.S. and CDFW jurisdictional streambed and associated riparian habitat because undergrounding the channel would result in the loss of these resources. Additionally, a small patch of cattails, located within the downstream portion of the existing drainage and considered a federally protected wetland, would be removed. As a consequence of constructing a new storm drain segment, the Project Site drainage would no longer support vegetation, including cattails. The Code Compliant Light Industrial/Warehouse Alternative would require implementation of Project Mitigation Measure MM-BIO-1, which requires the Project Applicant, prior to the issuance of grading permits, to obtain a CWA Section 404 permit from the USACE, a CWA Section 401 permit from the RWQCB, and Streambed Alteration Agreement permit under Section 1602 of the California Fish and Game Code from the CDFW. Issuance of these permits may include on- or off-site restoration or enhancement of USACE/RWQCB jurisdictional “waters of the U.S.”/“waters of the State” and wetlands at a ratio no less than 1:1 for permanent impacts, as well as on- or off-site restoration or enhancement of CDFW jurisdictional streambed and associated riparian habitat at a ratio no less than 1:1 for permanent impacts. Implementation of Project Mitigation Measure MM-BIO-1 would reduce impacts to jurisdictional resources to a less than significant level.

Similarly, the Project would underground the existing channel, which would no longer support vegetation, including cattails. The implementation of Project Mitigation Measure MM-BIO-1 was also required to reduce impacts to a less than significant level. Since the Code Compliant Light Industrial/Warehouse Alternative would underground the existing channel in a manner equivalent to that of the Project and would be required to implement Project Mitigation Measure MM-BIO-1, impacts under this Alternative would be similar.

d. Wildlife Movement

Development of the Code Compliant Light Industrial/Warehouse Alternative would necessitate the removal of existing on-site vegetation, including small trees, shrubs, and groundcover that have the potential to support nesting birds. This is considered a potentially significant impact. However, the Code Compliant Light Industrial/Warehouse Alternative would require implementation of Project Mitigation Measure MM-BIO-2, which requires the Project Applicant to demonstrate to the satisfaction of the County that construction would occur outside the breeding season or that nests are identified and appropriately avoided. With implementation of Project Mitigation Measure MM-BIO-2, impacts to wildlife movement would be reduced to a less than significant level.

Similarly, Project impacts to wildlife movement were determined to be potentially significant because it would remove vegetation suitable for nesting species. The implementation of Project Mitigation Measure MM-BIO-2 was determined to reduce impacts to a less than significant level. Since the Code Compliant Light Industrial/Warehouse Alternative would require vegetation removal in a manner materially similar to the Project, impacts under this Alternative would be similar to the Project.

e. Oak Woodlands or Unique Native Trees

The Code Compliant Light Industrial/Warehouse Alternative would result in no impact to oak woodlands because no oak trees are located on the Project Site. However, this Alternative would result in the removal of one unique native tree, the southern California black walnut. Similar to the Project, the removal of one specimen of a unique native tree from a highly disturbed location would be a less than significant impact.

4. Cultural Resources

a. Archaeological Resources

The Code Compliant Light Industrial/Warehouse Alternative would not require excavation for underground parking. Construction could still result in the potential to uncover previously unknown archaeological resources on the Project Site, as the sensitivity of the Site, based on the nearby location of other recorded sites, would remain unchanged. Project construction was determined to result in less than significant impacts on archaeological resources after mitigation. Project Mitigation Measures MM-ARCHAEO-1 through MM-ARCHAEO-4, which require construction monitoring and implementation of a recovery and treatment plan in the event archaeological resources or human remains are disturbed during earthmoving activities on Site, would be applicable to this Alternative. However, because deep excavations would not occur, impacts would be reduced compared to the Project.

b. Paleontological Resources

As noted for archaeological resources, this Alternative would eliminate the deep excavations associated with the Project. Construction would still result in the potential to uncover previously unknown paleontological resources on the Project Site, as the sensitivity of the Site, based on the presence of the Puente Formation rock unit, would remain unchanged. Project construction was determined to result in less than significant impacts on paleontological resources after mitigation. Project Mitigation Measures MM-PALEO-1 through MM-PALEO-3, which require construction monitoring and implementation of a recovery and treatment plan in the event significant resources are disturbed during earthmoving activities on Site, would be applicable to

this Alternative. However, because deep excavations would not occur, impacts would be reduced compared to the Project.

5. Geology

a. Geologic Hazard Effects

The Code Compliant Light Industrial/Warehouse Alternative would result in development of the Project Site with six one-story light industrial and warehouse buildings in a similar layout as the Project's six proposed buildings. The Project Site is not located within a State-designated Alquist-Priolo Earthquake Fault Zone, and there would be no potential for on-site fault rupture. With regard to ground shaking/seismicity, the Project Site would continue to be subject to periodic ground shaking and partially underlain by liquefiable soils that are classified as a Site Class F for design purposes. Due to underlying liquefiable soils, two of the proposed light industrial/warehouse buildings would be required to implement the recommendations of ground motion study, as approved by the County, prior to the issuance of a grading permit. All development would be required to perform additional expansion index testing and incorporate applicable recommendations should expansive soils be discovered. Development would also be required to over-excavate, and then re-compact native alluvial soils and colluvium at the location of building pads. This remedial grading would reduce the impacts associated with differential settlement at the zones of dirt removal and contact locations of the Monterey Formation bedrock and native alluvium materials. Further, all cut and fill areas would be shored and compacted in accordance with applicable provisions of the CBC, as incorporated into the County Building Code and County Building Code Appendix J. Implementation of the specific engineering recommendations contained within a Site-specific Geotechnical Report approved by LACDWP prior to the issuance of a grading permit would ensure that impacts related to ground shaking and seismicity, liquefaction, expansive soils, differential settlement, and cut and fill stability would be less than significant.

Similarly, the Project would result in less than significant impacts associated with fault rupture, ground shaking and seismicity, liquefaction, differential settlement, and cut and fill stability with the implementation of Project Design Features that require building design to comply with the recommendations of a Site-specific Geotechnical Report, as approved by the LACDWP prior to the issuance of a grading permit. Impacts with regard to geologic hazard effects under the Code Compliant Light Industrial/Warehouse Alternative would be similar to those of the Project.

6. Greenhouse Gas Emissions

a. Greenhouse Gas Emissions

As determined in Section 4.F, Greenhouse Gas Emissions, of this Draft EIR, when construction and operational GHG emissions are amortized over the life of the Project, the Project would achieve an equivalent or greater reduction from BAU that is necessary to meet the goals of AB 32 – that is, a reduction of at least 15.8 percent fewer GHG emissions than a comparable BAU development. GHG emissions reductions take into account both mobile sources and on-site sources. The reduction in trip generation under this Alternative would be smaller than for the Project due to truck traffic and because this land use would not have any trip capture features. Therefore, the reduction in vehicle trips under this Alternative would be less than the Project, and vehicular emissions would therefore be greater. As shown in Appendix K, this Alternative would achieve a GHG reduction of only 9.9 percent reduction compared to BAU, which does not meet the target reduction of at least 15.8 percent. This would be a significant unavoidable impact with regard to GHG

reduction targets. The Project would meet the target reduction and impacts were determined to be less than significant. Accordingly, impacts would be greater under this Alternative and would constitute a new significant and unavoidable impact.

b. Greenhouse Gas Reduction Plans

The Code Compliant Light Industrial/Warehouse Alternative would generate an increase in GHG emissions when compared to existing conditions. As with the Project, this Alternative would incorporate applicable portions of Project Design Feature PDF-AQ-1 that would reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, and installing energy-efficient lighting. The Code Compliant Light Industrial/Warehouse Alternative would also incorporate characteristics that would reduce transportation-related GHG emissions by locating Project-related jobs near residential and commercial uses and within one-quarter mile of transit, thereby encouraging alternative forms of transportation. However, with implementation of these Project Design Features, the Code Compliant Light Industrial/Warehouse Alternative would not meet the target GHG reduction percentage goals of AB 32. Therefore, this Alternative would result in significant unavoidable impacts which are greater than the less than significant impacts of the Project.

7. Hydrology and Water Quality

a. Water Quality

Construction of the Code Compliant Light Industrial/Warehouse Alternative would involve Site preparation activities, including excavation and grading. Such activities would temporarily alter the existing drainage patterns and water flows within the Project Site. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. However, as the construction Site would be greater than one acre, this Alternative would be required to implement temporary BMPs in accordance with NPDES SWPPP and the County's LID requirements. Implementation of the SWPPP and associated BMPs would reduce the discharge of potential pollutants in stormwater runoff to the maximum extent practicable, and a less than significant impact would result. Similarly, the Project's construction impacts on water quality were determined to be less than significant with the implementation of BMPs in accordance with NPDES SWPPP requirements. As a result, construction impact would be similar to the Project.

During operations, the Code Compliant Light Industrial/Warehouse Alternative's buildings and other impervious surface areas that could increase the rate of flow from the Project Site and potentially introduce new pollutants to stormwater flows. In accordance with the County LID requirements, this Alternative would be required to implement structural BMPs to reduce the potential for pollutants to enter stormwater flows leaving the Project Site and maintain permitted flow volumes and rates to permitted levels. It is anticipated that these BMPs would be largely the same as under the Project because the volume of stormwater runoff and tributary surface areas would be materially the same as under the Project. Subarea 2B-6B would continue to retain all stormwater flows beyond that permitted by the County, with other portions of the Project Site flowing undetained to either the 90-inch RCP or Gale Avenue. Structural BMPs would continue to include properly sized pipe connections to the proposed 90-inch RCP, isolator rows, underground detention basins, and filter inserts. The final selection of BMPs would be chosen during the LACDPW Drainage Concept Review and during the City's review of the Project's final storm drain plans. With implementation of approved BMPs, the Code Compliant Light Industrial/Warehouse Alternative would result in a less than significant impact to water quality.

Similarly, Project operation would result in a less than significant impact, for although the Project would introduce new impervious surface areas and potential new pollutant sources, as well as reduce any biofiltration from the partially channelized storm drain, it would also introduce structural BMPs in accordance with County LID requirements, which prevent the degradation of water quality. Further, Project construction would implement BMPs in accordance with the required SWPPP, resulting in a less than significant impact. As a result, impacts under the Code Compliant Light Industrial/Warehouse Alternative would be similar to those of the Project.

b. Drainage Patterns and Stormwater Drainage System

During construction, the implementation and monitoring of a SWPPP and associated BMPs would control potential pollutants from entering stormwater runoff. Although minor variations in stormwater drainage may occur during grading, the entire Project Site would ultimately continue to flow to the MTD No. 1000 drainage system throughout construction. Therefore, construction of this Alternative would result in a less than significant impact to drainage patterns and the stormwater drainage system. Similarly, construction of the Project would result in less than significant impact to drainage patterns and stormwater drainage systems with the implementation of BMPs and compliance monitoring. As a result, construction impacts under this Alternative would be similar to the Project.

Regarding operation, the Code Compliant Light Industrial/Warehouse Alternative would develop the Project Site with impervious surface areas, including parking areas, internal roadways, landscaping, and six one-story light industrial and warehouse buildings. Thus, like the Project, without the implementation of appropriate measures, the Code Compliant Light Industrial/Warehouse Alternative would increase flow volumes and reduce concentration times in a manner exceeding County permitted flow conditions to receiving water bodies. The development of light industrial and warehouse buildings instead of commercial and hotel buildings would not materially alter post-development drainage patterns because the building rooftops would continue to drain to their respective drainage subareas and hydraulically behave in a manner identical to commercial rooftops. This alternative's proposed drainage system would be designed to increase the volume of flow to MTD Line No. 1000 B, while decreasing the volume of flow to Gale Avenue and the catch basin at the intersection of Coiner Court (MTD No. 1000 Line A). This design strategy intends to create an on-site drainage subarea (Subarea 2B-6B) large enough to efficiently maintain flows to County permitted volumes for the Project Site (i.e., 2.12 cfs per acre). Flow volumes would be maintained by incorporating structural BMPs into the system's design, including properly sized piping at the connection points to MTD No. 1000 Line B and underground detention basins. County and City review and approval of the proposed stormwater drainage system would ensure on-site retention is adequate for the Code Compliant Light Industrial/Warehouse Alternative. Upon implementation of the approved BMPs, this Alternative's contribution to the MTD No. 1000 Line B system would be within County-permitted volumes, and downstream peak flow rates would be unaffected after the confluence of MTD No. 1000 Lines A and B. Thus, the Code Compliant Light Industrial/Warehouse Alternative would limit flow volumes to those permitted by the County and would not exceed the capacity of existing or planned stormwater drainage systems, and less-than-significant impacts would result.

Similarly, the Project would also result in a less than significant impact; while all on-site stormwater would continue to flow to the MTD No. 1000 storm drain system, BMPs similar to those associated with the Code Compliant Light Industrial/Warehouse Alternative would be required to comply with County LID requirements to maintain County permitted flow volumes, even with the increase in impervious surface area.

As a result, impacts under the Code Compliant Light Industrial/Warehouse Alternative would be similar to those under the Project.

8. Land Use and Planning

a. County Planning Documents

Under the Code Compliant Light Industrial/Warehouse Alternative, the Project Site would be developed in a manner consistent with the underlying land use designation and zoning regulations. The Project's requested Zone Change (from M-1.5 to C-3-[DP]) for Parcels 2 and 3 would not be sought, and the entire portion of the Project Site within the unincorporated County would remain in the M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion) one. This alternative's proposed light industrial and warehouse uses are consistent with the land use documents governing the Project Site, including the Rowland Heights CSD. For example, this Alternative proposes a maximum site coverage of 40 percent and maximum building heights would be 45 feet above grade or less in accordance with LACC Section 22.44.132(D)(4). Site design would adhere to all applicable landscaped setbacks, including the 10-foot landscaped setback along Gale Avenue. The Code Compliant Light Industrial/Warehouse Alternative would also support Southern California Association of Governments (SCAG) and County planning objectives to reduce vehicle miles traveled and encourage the use of public transit by developing an infill project that locates jobs within proximity to transit options and existing housing, as well as by improving pedestrian connections along Gale Avenue. Moreover, the Code Compliant Light Industrial/Warehouse Alternative would continue to represent a compatible infill development on an underutilized parcel within an urban, developed portion of unincorporated Los Angeles County developed with similar uses. As a result, the Code Compliant Light Industrial/Warehouse Alternative would be consistent with applicable plans and policies.

In comparison, the Project would result in a less than significant impact with respect to policy compliance through County approval of requested entitlements, including a zone change from M-1.5 to C3 for the proposed hotel parcels, a Vesting Tentative Tract Map to subdivide the portion of the Project Site within the unincorporated County into three parcels, and various CUPs to permit buildings in excess of permitted heights and the sale of alcoholic beverages. The Project also includes design features such as setbacks, the screening of on-site parking areas, and high-quality architectural materials to comply with applicable County Plans, including the Rowland Height CSD. By proposing only one-story buildings, the Code Compliant Light Industrial/Warehouse Alternative would provide for compatibility with existing development to the east and west, which consists of one- and two-story commercial buildings, respectively. However, the Project was ultimately determined to result in a less than significant impact, as adjacent buildings are not sensitive to this transition and residential land uses are located more than 300 feet south of the Project Site across SR-60. Because this Alternative would develop the Project Site in accordance with applicable planning documents, thus negating the need for a zone change or CUPs for a height exemption, impacts under this Alternative would be less than under the Project.

b. Los Angeles County Code

Under the Code Compliant Light Industrial/Warehouse Alternative, the Project Site would be developed in a manner consistent with its underlying land use designation and zoning regulations. The Project's requested Zone Change (from M-1.5 to C-3-[DP]) for Parcels 2 and 3 would not be sought, and the entire portion of the Project Site within the unincorporated County would remain in the M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion) zone. Light industrial and warehouse uses are consistent with the

underlying M-1.5 zoning. As discussed above, these uses would be compatible with adjacent and nearby development in accordance with LACC Section 22.56.040. The two western buildings would be of a similar use to the adjacent Concourse Business Park. Similarly, the four eastern buildings would also be of a scale, height, and use compatible with the Rowland Heights Shopping Center. The nearest residential uses are 300 feet south of the Project Site across SR-60; thus, development proposed under this Alternative would not be incompatible with residential uses. Therefore, the Code Compliant Light Industrial/Warehouse Alternative would result in a less than significant impact with regard to the LACC.

In contrast, the Project would require County approval of a zone change for the hotel parcels, a tentative tract map, and various CUPs to provide compliance with the LACC. The Code Compliant Light Industrial/Warehouse Alternative would be slightly more compatible with the adjacent Concourse Business Park, as it would result in two one-story light industrial/warehouse buildings instead of two six-story hotel buildings. However, as discussed above, the business park is not a use sensitive to minor transitions in height and scale, and the hotel uses would not be incompatible with commercial uses. The light industrial and warehouse uses proposed under this Alternative would be less compatible with the adjacent Rowland Heights Shopping Center and nearby hotel use than the commercial and hotel uses proposed under the Project. A reduction in compatibility with the adjacent commercial uses would also occur from a reduction in pedestrian connectivity and synergistic uses when compared to the Project. However, because the Code Compliant Light Industrial/Warehouse Alternative does not require an underlying zone change and requires fewer CUPs, impacts under this Alternative would be less than under the Project.

9. Noise

a. On-Site Construction

Under the Code Compliant Light Industrial/Warehouse Alternative, the duration of construction would be reduced compared to the Project. However, the intensity of construction (equipment usage) would be similar on a daily and hourly basis. Project construction was determined to result in a potentially significant noise impact at the nearby Best Western Plus Executive Inn hotel (Location R1). Specifically, estimated construction noise levels for all construction phases would exceed the established threshold of 70 dBA. With the implementation of Project Mitigation Measure MM-NOISE-1, which requires the construction of a temporary noise barrier 12 feet in height with noise blankets capable of achieving sound level reductions of at least 9 dBA along the southern boundary of active construction within the line-of-sight of the hotel would achieve a noise reduction of 10 dBA or more in areas, thus reducing impacts to a less than significant level. As the Code Compliant Light Industrial/Warehouse Alternative would have a similar construction intensity compared to the Project, impacts under this Alternative would be similar to the Project.

b. Off-Site Project Construction Activities

Off-site noise impacts (from hauling, trucking, etc.) due to the Project were found to be less than significant. Because the Code Compliant Light Industrial/Warehouse Alternative would result in similar construction activities compared to the Project, impacts would be similar.

c. On-Site Operation

The Code Compliant Light Industrial/Warehouse Alternative would reduce the number of visitors at the Project Site, which would reduce on-site sources of noise, including noise generated by hotel and commercial

uses. In comparison, Project operation was found to result in less than significant impacts related to on-site activities (use of open space, car alarms, etc.) and on-site equipment. Peak hourly mobile sources of Project-related noise would also decrease. Operational noise impacts would remain less than significant, and would be reduced compared to the Project.

d. Off-Site Operation Activities

The Code Compliant Light Industrial/Warehouse Alternative would reduce the number of visitors to the Project Site. In addition, the number of peak hour trips would also be lower, with a corresponding reduction in off-site operational noise impacts. In comparison, Project operation was found to result in less than significant impacts. As the Code Compliant Light Industrial/Warehouse Alternative would result in fewer peak hour trips and off-site noise, impacts under this Alternative would be less than under the Project.

10. Fire Protection and Emergency Services

Construction activities associated with the Code Compliant Light Industrial/Warehouse Alternative may temporarily increase demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials. However, application of applicable of State and County regulations and Code requirements would ensure that impacts on fire protection and emergency medical services would be less than significant. Regarding emergency access and response times, the Code Compliant Light Industrial/Warehouse Alternative would be required to implement Project Design Feature PDF-TRAF-1 from Section 4.K, Transportation and Parking, which would ensure construction activity and traffic would have a less than significant impact on emergency access and response times in the Project vicinity.

Similarly, construction of the Project was determined to result in a less than significant impact with adherence to applicable regulations and implementation of Project Design Feature PDF-TRAF-1. As a result, construction impacts under the Code Compliant Light Industrial/Warehouse Alternative would be similar to the Project.

Regarding operations, the Code Compliant Light Industrial/Warehouse Alternative would result in an increase in development and employees at the Project Site, thus increasing the demand for fire protection services. However, this Alternative would be required to meet all County fire flow requirements, which would be 4,000 GPM at 20 psi minimum residual pressure for a duration of four hours. As there are currently no fire hydrants on the Project Site, all fire hydrants would be installed to meet LACFD requirements. The location of public and private fire hydrants would be reviewed and conditionally approved by the LACFD prior to the issuance of building permits. The fire service connection would be from an existing 12-inch water line located within the Gale Avenue right-of-way. This water line was determined to meet fire flow requirements for the Project; since the Code Compliant Light Industrial/Warehouse Alternative would have a reduced building height and floor area, the water line is also anticipated to meet fire flow requirements. This Alternative would be subject to the requirements of the Building Code, Fire Code, and Utilities Code for new construction that address structural design, building materials, site access, fire lanes, fire flow requirements, automatic sprinkler systems, alarms, and smoke detectors. Furthermore, the Project Applicant would be required to submit an Emergency Response Plan for review and approval by the LACFD. As determined in Section 4.J.1, Fire Protection and Emergency Services, of this Draft EIR, the Project Site falls within LAFCD's response time goals. Project Design Feature PDF-TRAF-2, in Section 4.K,

Transportation and Parking, which improves access at the primary Project Site access with appropriate striping and signaling, would be applicable to the Code Compliant Light Industrial/Warehouse Alternative as well, thus maintaining emergency response time and access to the Project Site. Therefore, the Code Compliant Light Industrial/Warehouse Alternative's impacts to fire protection and emergency services would be less than significant.

Similarly, the Project would result in a less than significant impact on fire protection and emergency services. The one-story light industrial and warehouse uses would reduce the development proposed (450,806 square feet total floor area for the Project vs. 244,982 square feet total floor area for this Alternative). The reduction in uses would cause a corresponding reduction in the number of people on the Site at any time, particularly at night. As this Alternative proposes a maximum building height of one story, there would be a minor reduction in demand because the LACFD would not have to respond to mid-rise buildings. As a result, impacts under the Code Compliant Light Industrial/Warehouse Alternative would be less than under the Project.

11. Sheriff Protection Services

During construction of the Code Compliant Light Industrial/Warehouse Alternative, activities due to construction traffic and temporary lane closures associated with utility connections and roadway improvements could potentially affect emergency access to the Project Site and adjacent uses, as well as increase traffic on area roadways and reduce response times. However, the impacts of construction activities would be temporary and short term. This Alternative would implement Project Design Feature PDF-TRAF-1, which requires that a Construction Staging and Traffic Management Plan be prepared and submitted to LADPW for review and approval prior to commencement of any construction activity. Project Design Feature PDF-TRAF-1 would minimize disruptions to through traffic flow and reduce the potential for interference with emergency access. Security measures would be incorporated during construction, including construction fencing, security lighting, locked entry, and private security to reduce potential incidents of theft or vandalism. All entry and exit points would be monitored during construction. Therefore, construction of the Code Compliant Light Industrial/Warehouse Alternative would result in a less than significant impact to Sheriff protection services. Similarly, the Project was determined to result in a less than significant construction impact to Sheriff protection services with implementation of identified Project Design Features and other security measures. As a result, construction impacts under this Alternative would be similar to the Project.

Regarding operation, development of the Code Compliant Light Industrial/Warehouse Alternative would introduce a daytime and, potentially, evening population to the Project Site, compared to the Project's more intensive 24-hour population, potentially reducing demand for LASD services compared to the Project. Like the Project, this Alternative could result in traffic impacts that could cause delays in emergency response times; however, this Alternative would implement Project Design Feature PDF-TRAF-2, which requires the installation of a three-way traffic signal at the main Project driveway and Gale Avenue and would help maintain adequate response times to the Project Site. Furthermore, emergency response is also routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response.

The Project was determined to result in a less than significant impact to Sheriff protection services through implementation of on-site security features, Project Design Feature PDF-TRAF-2, and adequate response

times. As the Code Compliant Light Industrial/Warehouse Alternative represents a less intensive development program than the Project, the number of guests, visitors, and patrons on the Project Site would also be decreased, and impacts under the Alternative would ultimately be less than under the Project.

12. Transportation and Parking

a. Intersections

The Code Compliant Light Industrial/Warehouse Alternative would develop six one-story light industrial buildings in the proximate location and spatial arrangement of the commercial and hotel buildings proposed under the Project. As shown in **Table 5-6, Trip Generation: Code Compliant Light Industrial/Warehouse Alternative**, this Alternative would generate fewer vehicle trips from the Project Site than the Project. Specifically, the Alternative would result in 1,290 average daily trips, 148 total weekday morning peak hour trips, 158 total weekday afternoon peak hour trips, and 34 total Saturday mid-day peak hour trips. When compared to the Project, this represents a decrease of 9,067 average daily trips, 393 total weekday morning peak hour trips, 688 total weekday afternoon peak hour trips, and 1,058 total Saturday mid-day peak hour trips. Because light industrial and warehouse uses do not generally capture pass-by trips (stopovers on the way to other scheduled destinations) or generate an internal synergy between uses that would reduce vehicle trips, no pass-by or internal capture credit was applied to the Alternative’s trip generation rates.

Table 5-6

**Trip Generation:
Code Compliant Light Industrial/Warehouse Alternative**

Land Use	Size	Estimated Trip Generation ^a									
		Average Daily Trips ^a	Weekday AM Peak Hour Trips			Weekday PM Peak Hour Trips			Sat Mid-Day Peak Hour Trips		
			In	Out	Total	In	Out	Total	In	Out	Total
Light Industrial	122,491 sf	854	99	13	112	15	104	119	9	9	18
Warehouse	122,491 sf	436	29	7	36	10	29	39	10	6	16
TOTAL ALTERNATIVE TRIPS		1,290	128	20	148	25	133	158	19	15	34
TOTAL PROJECT TRIPS		10,357	312	229	541	449	397	846	566	526	1,092
DIFFERENCE		(9,067)	(184)	(209)	(393)	(424)	(264)	(688)	(547)	(511)	(1,058)

^a Source for trip generation rates: *Trip Generation, 8th Edition, Institute of Transportation Engineers (ITE), 2012, Land Use Categories 110 and 150.*

Source: PCR Services Corporation, August 2015 (included in Appendix K-2, Trip Generation Worksheets, of this Draft EIR).

Because the Code Compliant Light Industrial/Warehouse Alternative would result in comparatively fewer vehicle trips from the Project Site, it would also result in fewer vehicle trips on area roadways when compared to the Project. As discussed in Section 4.K, Transportation and Parking, and above, even with implementation of Project Mitigation Measure MM-TRAF-1, the Project would result in significant and unavoidable impacts at Intersection No. 4 (Fullerton Road & Colima Road) and Intersection No. 18 (Nogales Street & Colima), where the intersections are fully built out and no right-of-way is available to complete physical improvements.

As shown in **Table 5-7**, *Alternative 3: Code Compliant Light Industrial/Warehouse Alternative Future (2018) With Alternative Plus Cumulative Traffic Conditions Service Levels for Affected Signalized Intersections*, this Alternative would eliminate the Project's potentially significant and unavoidable impacts at Intersections No. 4, 10, and 18, as well as the Project's potentially significant but mitigable impact at Intersection No 13. While this Alternative would still result in a potentially significant impact at Intersection No. 15 (Nogales Street & Gale Avenue/Walnut Drive), Mitigation Measure MM-TRAF-1 would still be applicable and requires the Project Applicant to pay a fair-share contribution to identified physical improvements at this intersection, which would reduce this impact to a less than significant level. Therefore, intersection impacts under the Code Compliant Light Industrial/Warehouse Alternative would be less than those of the Project.

Table 5-7

**Alternative 4: Code Compliant Light Industrial/Warehouse Alternative
Future (2018) With Alternative Plus Cumulative Traffic Conditions
Service Levels for Affected Signalized Intersections**

ID	N/S Street Name	E/W Street Name	Peak Period	Existing (2015)		Future (2018) With Project Plus Cumulative			
				V/C	LOS	Without Improvements			
						V/C	LOS	Project Impact	Sig Impact
1	Fullerton Rd	Gale Ave	A.M.	0.657	B	0.558	A	0.001	No
			P.M.	0.649	B	0.570	A	0.034	No
			SAT	0.792	C	0.672	B	0.001	No
3	Fullerton Rd	SR-60 Fwy EB Ramps	A.M.	0.663	B	0.596	A	0.033	No
			P.M.	0.657	B	0.579	A	0.022	No
			SAT	0.847	D	0.774	C	0.027	No
4	Fullerton Rd	Colima Rd	A.M.	0.773	C	0.665	B	0.006	No
			P.M.	0.825	D	0.710	C	0.007	No
			SAT	0.841	D	0.730	C	0.008	No
10	Nogales St	La Puente Rd	A.M.	0.818	D	0.726	C	0.008	No
			P.M.	0.774	C	0.677	B	0.003	No
			SAT	0.774	C	0.675	B	0.010	No
13	Nogales St	San Jose Ave	A.M.	0.641	B	0.542	A	0.003	No
			P.M.	0.896	D	0.726	C	0.003	No
			SAT	0.569	A	0.458	A	0.000	No
15	Nogales St	Gale Ave/Walnut Dr	A.M.	0.820	D	0.642	B	0.017	No
			P.M.	1.125	F	0.846	D	0.047	YES
			SAT	1.002	F	0.776	C	0.016	No
18	Nogales St	Colima Rd	A.M.	0.810	D	0.691	B	0.004	No
			P.M.	0.720	C	0.613	B	0.015	No
			SAT	0.825	B	0.696	B	0.002	No

Source: *Kunzman Associates, Inc., December 2015 (provide in Appendix K-2, Trip Generation Worksheets, of this Draft EIR).*

b. Congestion Management

As discussed above, the Code Compliant Light Industrial/Warehouse Alternative would result in the generation of fewer vehicle trips at the Project Site than the Project. The Project was determined to result in a less than significant impact to the nearest CMP intersection, Azusa Avenue and Colima Road, located 2.2

miles southwest of the Project Site because this Alternative would add fewer than 50 vehicle trips to the intersection during either the morning or afternoon peak hours. As the Code Compliant Light Industrial/Warehouse Alternative would generate fewer trips, it would also result in a less than significant impact, and impacts under this Alternative would be less than under the Project.

c. Traffic Hazards

The Code Compliant Light Industrial/Warehouse Alternative would introduce an ingress/egress driveway and signalized intersection at the proposed parcel boundary between Parcel 1 and Parcels 2 and 3, which would serve as the primary Project Site entrance, and a new ingress/egress driveway into Parcels 2 and 3 along the western Project Site boundary. Both intersections which would be designed in accordance with applicable design standards. Proposed accesses and circulation would be reviewed by LACDPW Traffic and Lighting Public Works Road Division with respect to Caltrans/Los Angeles County standards to ensure that this Alternative does not substantially increase hazards due to a design feature. The County would also periodically review traffic operations in the Project vicinity once the Project is constructed to ensure that traffic operations are satisfactory. Therefore, impacts under the Code Compliant Light Industrial/Warehouse Alternative would be less than significant.

The Project proposes a nearly identical circulation plan, with the above-described access driveways being implemented under the Project as well. The access driveways would be designed in accordance with applicable design standards and reviewed by LACDPW Traffic and Lighting Public Works Road Division, resulting in a less than significant impact. As a result, impacts to with regard to traffic hazards under the Code Compliant Light Industrial/Warehouse Alternative would be similar to the Project.

d. Emergency Access

Construction of the Code Compliant Light Industrial/Warehouse Alternative and construction-related activities would be required to implement Project Design Feature PDF-TRAF-1, which requires implementation of a Construction Staging and Traffic Management Plan. With implementation of Project Design Feature PDF-TRAF-1, construction impacts to emergency access under this Alternative would be less than significant.

Similarly, the Project would result in a less than significant impact to emergency access during Project construction with the implementation of Project Design Feature PDF-TRAF-1. Because the Code Compliant Light Industrial/Warehouse Alternative represents a reduced development when compared to the Project, the overall duration and number of construction vehicles would be reduced as well. As a result, construction impacts under this Alternative would be less than under the Project.

With respect to operation, the County would review this Alternative's design plans to ensure deployment of fire equipment or other services under emergency conditions, among other access provisions, would be adequate for this Alternative in accordance with Los Angeles County, Code of Ordinances, Title 21, Subdivisions, Chapter 21.24, Design Standards, Part 1, Access, Section 21.24.010, General Requirements. Access drives and internal private drives would be designed to meet the County and LACFD standards, incorporating any revisions requested by LACDPW. Therefore, operation of the Code Compliant Light Industrial/Warehouse Alternative would result in a less than significant impact to emergency access.

Similarly, the Project's operational impacts to emergency access would be less than significant through appropriately designed access and internal circulation, as reviewed and approved by the County. However, the Code Compliant Light Industrial/Warehouse Alternative would result in a reduced number of vehicle trips than under the Project, it would have less potential to impact response times in the Project vicinity. As a result, operational impacts under the Code Compliant Light Industrial/Warehouse Alternative would be less than under the Project.

e. Plan and Policy Consistency

The Code Compliant Light Industrial/Warehouse Alternative would develop six one-story light industrial and warehouse buildings. Because light industrial and warehouse land uses have a lower parking demand than commercial and hotel uses, this Alternative would be required to provide 367 parking spaces per the County Parking Code (compared to a Code requirements of 1,503 parking spaces for the Project). As a result, the Code Compliant Light Industrial/Warehouse Alternative would require less parking than the Project. Although some of this parking would accommodate larger vehicles, such as delivery trucks, it is anticipated that all parking can be accommodated within surface parking lots, and no subterranean parking would be required. For instance, the Project proposed 792 surface parking spaces. Even if the portion of the Project Site within the City of Industry remains unstriped for parking to accommodate the vehicle movement of larger vehicles, the Project Site would reasonably be assumed to accommodate 717 surface parking spaces. As a result, parking would be adequate, and the Parking Permit sought under the Project would not be required. Additionally, this Alternative would also not require implementation of Project Design Feature PDF-TRAF-3, which establishes a maximum occupant load for restaurant uses and controls restaurant occupancy restrictions through the Commercial Center CC&Rs. Therefore, this Alternative would result in a less than significant impact to parking. The Code Compliant Light Industrial/Warehouse Alternative would also be consistent with all adopted plans, policies, and programs supporting alternative transportation by locating a jobs-rich project within close proximity to existing transit options and improving pedestrian connections in the immediate Project vicinity. Therefore, impacts under the Code Compliant Light Industrial/Warehouse Alternative would be less than significant.

In comparison, the Project would result in a less than significant impact to parking by providing adequate parking in accordance with LACC requirements and requesting County approval of a Parking Permit as part of the entitlements. Further, the Project would result in a less than significant impact to plan and policy consistency by improving pedestrian connections and supporting transit options by developing a Project within proximity to mass transit options and developing pedestrian connections. However, because the Code Compliant Light Industrial/Warehouse Alternative would generate a reduced demand for parking when compared to the Project and be able to provide parking without any Parking Permit, overall impacts under this Alternative would be less than under the Project.

13. Wastewater

a. Wastewater Collection

During construction, existing on-site sewer lines currently serving other uses would be preserved in place. Furthermore, no deep excavations are proposed in the area of this existing sewer line, so that there would not be a substantial potential to damage this sewer line during Project construction. As a result, construction of the Code Compliant Light Industrial/Warehouse Alternative would not disrupt sewer services, and less than significant impact would result. Similarly, construction of the Project was determined to result in a less

than significant impact to wastewater collection because no off-site service would be disrupted. As a result, construction impacts under this Alternative would be similar to the Project.

Regarding operation, as shown in **Table 5-8, Sewage Generation: Code Compliant Light Industrial/Warehouse Alternative**, this Alternative would generate an estimated total average sewage flow rate of 0.0190 cfs (which translates to a daily average flow of 12,280 gpd), and a total peak sewage flow of 0.0480 cfs. This sewerage flow would be accommodated by the LACCSMD 12-inch sewer line, which flows from the northwest corner of the Project Site to the 30-inch Sanitation District trunk sewer. The 12-inch sewer line serving the Project Site was determined to be adequate to serve the Project. Because of the comparative decrease in flows under this Alternative, the 12-inch sewer line would also be adequate to serve the Code Compliant Light Industrial/Warehouse Alternative.

Table 5-8

**Sewage Generation:
Code Compliant Light Industrial/Warehouse Alternative**

Land Use	Quantity	Sewage Generate Factor ^a	Flow Rate		
			Average (gpm)	Average (cfs)	Peak (cfs)
Light Industrial	122,491 SF	80/1,000 SF ^b	6.81	0.0152	0.698
Warehouse	122,491 SF	100/1,000 SF	1.70	0.0038	0.126
Alternative 4 Total			8.51	0.0190	0.0480
Project Total			89.69	0.1998	0.4996
Difference			(81.18)	(0.1808)	(0.4516)

^a Los Angeles County does not provide sewage generation rates for light industrial and warehouse uses in its *Estimated Average Daily Sewage Flows for Various Occupancies*. Wastewater generation rates based on the City of Los Angeles CEQA Thresholds Guide (2006), Exhibit M.2-12: Sewage Generation Factors.

^b Light Industrial Wastewater Generation Rates do not account for process flows, which would be determined on an individual use basis in accordance with the County's Industrial Wastewater Discharge Permitting Process.

Source: PCR Services Corporation, August 2015

It is important to note that the wastewater generation shown in Table 5-8 does not include process flows for the proposed light industrial uses. Process flow is wastewater generated during the industrial process not used for domestic purposes (i.e., cooling water). Because process flows are use-specific, they cannot be known at this time; therefore, the above-stated wastewater generation likely represents only a portion of wastewater generation associated with this Alternative. That said, if individual on-site tenants generate process flows, they would be required to obtain from an Industrial Wastewater Discharge Permit from the County prior to a certificate of occupancy. The Industrial Wastewater Discharge Permit establishes a separate connection fee and surcharge based on estimated process flows, as well as maximum allowable pollutant concentrations in wastewater flows. Prior to the issuance of a Wastewater Discharge Permit, the tenant would be required to demonstrate adequate pre-treatment of process flows in a Waste Minimization Plan. It is the Districts' requirement that all sanitary lines at a facility must be kept separate from industrial process flows until after the industrial wastewater has passed through all pretreatment facilities, monitoring devices, and flow measuring systems. Furthermore, this Alternative would pay the required sewer

connection fees, including any additional fees associated with the Wastewater Discharge Permit, to help defray Sanitation District costs for providing sewer conveyance for the proposed Project. With approval of applicable permits and payment of fees, impacts would be less than significant.

In comparison, operation of the Project would generate an estimated total average sewage flow rate of 0.1998 cfs (which translates to a daily average flow of 129,153 gpd), and a total peak sewage flow of 0.4996 cfs. As a result, the Code Compliant Light Industrial/Warehouse Alternative represents a reduction in daily average flow and total peak sewage flow of 0.1808 cfs (116,854 gpd) and 0.4516 cfs, respectively. According to the capacity analysis in the Sewer Capacity Study, the LACCSMD's 12-inch sewer line from the northwest corner of the Project Site to the 30-inch Sanitation District trunk sewer would operate at above 50 percent full (specifically, 119 percent of capacity) under existing plus Project conditions. However, because LACDPW design criteria permit sewer lines to operate at 150 percent of capacity, the downstream wastewater collection system has adequate capacity to accommodate the sewage to be generated by the Project. Because the Code Compliant Light Industrial/Warehouse would result generate less wastewater than the Project, impacts under this Alternative would be less than those of the Project.

b. Wastewater Treatment

The Code Compliant Light Industrial/Warehouse Alternative's wastewater generation would be an estimated 8.51 gpm, or approximately 0.01 mgd. As indicated in Section 4.L.1, Wastewater, the San Jose Creek WRP has an existing treatment capacity of 100 MGD and currently treats an average daily flow of 71.3 mgd. Based on these numbers, the San Jose Creek WRP has a remaining unused treatment capacity of approximately 28.7 mgd. As discussed above, any process flows stemming from the light industrial uses would be reviewed and approved on a case-by-case to ensure adequate treatment capacity is available. However, these flows are anticipated to be well below the remaining treatment capacity of the San Jose WRP. As a result, the Code Compliant Light Industrial/Warehouse Alternative would result in a less than significant impact with respect to wastewater treatment.

In comparison, the Project's wastewater generation would be an estimated 89.69 gpm, or approximately 0.108 mgd. Therefore, the Code Compliant Commercial Alternative represents an increase of 59.30 gpm, or 0.107 mgd, over the Project. The Project's contribution was determined to represent a negligible proportion (approximately 0.4 percent) of the remaining unused treatment capacity of the San Jose Creek WRP, and the Project was determined to result in a less than significant impact to wastewater treatment. As the Code Compliant Light Industrial/Warehouse Alternative would generate less wastewater than the Project, impacts under this Alternative would be less than under the Project.

14. Water Supply

a. Construction

The Code Compliant Light Industrial/Warehouse Alternative would require construction of a new on-site sanitary water and fire water conveyance system and the connection of this system to the existing 12-inch water pipeline in the Gale Avenue right-of-way. No active water lines serving adjacent properties bisect the Project Site, so there would be no potential to interrupt water service to adjacent properties (such as due to inadvertent damage of existing lines) during construction. Therefore, construction impacts to water supply under the Code Compliant Light Industrial/Warehouse Alternative would be less than significant. Similarly, Project construction impacts were determined to be less than significant because no water supply lines

bisect the Project Site and no disruption of service would occur. As a result, impacts under this Alternative would be similar to the Project.

b. Water Supply

The Code Compliant Light Industrial/Warehouse Alternative would increase on-site water demand by an estimated 13.7 AFY of potable water at buildout in 2020. When considering this Alternative, water demand within the RWD would increase from 13,484 AFY to 13,498 AFY. Because this would be well within RWD's potable water supply between the years of 2020 and 2025 (13,500 AFY and 14,700 AFY, respectively), it is anticipated that adequate potable water supply would be available to serve this Alternative. Similarly, with the addition of the nonpotable water demand of 2.7 AFY for this Alternative by buildout in 2020 (for landscape irrigation)¹⁶, nonpotable water demand within the RWD would increase from 5,000 AFY to 5,049 AFY. Because this would fall within the RWD's 2020 nonpotable water supply of 6,200 AFY, adequate nonpotable water supply would be available to serve this Alternative. Therefore, this Alternative's water supply impacts would be less than significant.

Similarly, the increase in water demand associated with the Project was determined to be within the RWD's potable water supply between the years of 2020 and 2025, and within the RWD's 2020 nonpotable water supply; impact would be a less than significant. When compared to the Project, the Code Compliant Industrial/Warehouse Alternative represents a smaller increase in potable and nonpotable water demand. As a result, impacts under the Code Compliant Industrial/Warehouse Alternative would be less than those of the Project.

C. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The ability of the Code Compliant Light Industrial/Warehouse Alternative to meet the stated objectives of the Project is summarized in Subsection 5.E, below. As shown, this Alternative does not meet the Project's underlying purpose or primary objective because it provides neither commercial retail uses nor hotels. Because it would not provide any commercial uses or hotels, this Alternative would not achieve any of the Project's Commercial/Retail or Hotel objectives.

The Code Compliant Light Industrial/Warehouse Alternative would partially achieve the Project's Siting and Design Objective Nos. 4 and 5 pertaining to enhancement of the pedestrian experience along Gale Avenue and provide street-level pedestrian connectivity to the Project Site. The Alternative would also provide common open space amenities in response to community input related to visual enhancement of the parking and for the use by Project patrons and employees. However, while the pedestrian experience along Gale Avenue would be improved, internal circulation and open space areas would be far less extensive and useful to pedestrians than with the Project. Common open space amenities would also be reduced compared to the Project since the open space would be more modest than under the Project since the Alternative would not have commercial patrons. This Alternative would not achieve Siting and Design Objectives Nos. 1, 2, and 3 pertaining to a consistently high level of pedestrian activity 24 hours a day on the Site, maximizing efficient use of the Site through a shared parking program, or taking advantage of the natural slope of the Site through

¹⁶ Water demand represents 120 percent of estimated Project wastewater generation to account for landscaping irrigation that would not enter the sewer system. As with the Project, the 20 percent of water used for irrigation under this Alternative was assumed to be recycled, nonpotable water.

construction of subterranean parking. However, shared and subterranean parking would not be needed due to the reduced demand for parking with light industrial and warehouse uses.

Finally, this Alternative would not achieve Project Economic and Employment Objectives Nos. 1 and 3 pertaining to the creation of a viable mix of complementary retail, office, restaurant, and hotel uses of a sufficient size to create synergy and attract patrons, and the generation of net new sales and hotel taxes for the County. This Alternative would partially achieve the Economic and Employment Objective No 2, the creation of construction jobs and long-term service and professional employment opportunities, albeit to a lesser degree than the Project.

D. CONCLUSION

Therefore, the reduction in vehicle trips under this Alternative would be less than reductions under the Project would be, and vehicular emissions under this Alternative would therefore be greater than those of the Project. This Alternative would achieve a GHG reduction of only 9.9 percent reduction compared to BAU, which does not meet the target reduction of at least 15.8 percent. Accordingly, GHG emission and plan consistency impacts would be greater under this Alternative and would constitute a new significant and unavoidable impact.

Impacts for air quality (criteria pollutants), biological resources, geology, hydrology and water quality, land use and planning, noise, and construction-related demand for Sheriff and fire protection services and water supply would be similar to those of the Project. All other impacts would be less than those of the Project.

5.0 ALTERNATIVES

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the State *CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the “no project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible Alternatives includes the No Project/No Build Alternative, Reduced Intensity Alternative, Code Compliant Commercial Alternative, and Code Compliant Light Industrial/Warehouse Alternative.

Table 5-9, Comparative Impact Summary provides a comparative summary of the environmental impacts anticipated under each alternative to the environmental impacts associated with the Project. The summary is based on the detailed evaluation of the potential impacts associated with each alternative provided in the previous sections. Pursuant to Section 15126.6(c) of the State *CEQA Guidelines*, the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

As discussed above and as shown in Table 5-9, the No Project/No Build Alternative is considered the overall environmentally superior alternative, as it would avoid all of the impacts that would occur under the Project. However, although most impacts would be avoided under the No Project/No Build Alternative, beneficial aspects of the Project would not occur. These beneficial aspects are providing a high quality, jobs-rich, integrated development of complementary commercial retail establishments and hotels in close proximity to residential uses and public transit option; upgrading of the parcel with attractive architecture and landscaping; and fulfilling numerous regional and County plan and policy goals for the area. As indicated above, without development of a commercial and hotel project, the No Project/No Build Alternative would not meet any of the Project Objectives. The extent to which the Reduced Intensity Alternative, Code Compliant Commercial Alternative and Code Compliant Light Industrial/Warehouse Alternative would meet the Project’s Objectives is summarized in **Table 5-10, Comparison of Alternatives - Ability to Achieve Project Objectives**.

In accordance with the State *CEQA Guidelines* requirement to identify an environmentally superior Alternative other than the No Project/No Build Alternative, a comparative evaluation of the remaining Alternatives indicates that the **Reduced Intensity Alternative would be the environmentally superior Alternative**. Specifically, the Reduced Intensity Alternative would reduce the Project’s significant and unavoidable impacts regarding regional air quality emissions (operational) and traffic study area intersections while meeting the majority of the Project’s stated objectives. With implementation of the Project’s identified mitigation measures, all of the Reduced Intensity’s potentially significant impacts would be reduced to a less than significant level.

However, as noted in the conclusion for the Reduced Intensity Alternative, this Alternative would not fully achieve the Project’s underlying purpose and primary objective, and would either partially achieve or not achieve nine of the 18 specific Project Objectives. For this reason and the financial viability reasons detailed above, the Reduced Intensity Alternative is not considered feasible.

Table 5-9

Comparative Impact Summary

	Project Impact	Alternative 1: No Project/ No Build	Alternative 2: Reduced Intensity Alternative	Alternative 3: Code Compliant Commercial Alternative	Alternative 4: Code Compliant Light Industrial/Warehouse Alternative
1. Aesthetics					
Visual Character	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Light and Glare	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Shading	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
2. Air Quality					
Criteria Pollutants and Toxic Air Contaminants - Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Criteria Pollutants and Toxic Air Contaminants - Operation	Significant Unavoidable	Less (No Impact)	Less (Less than Significant)	Greater (Significant Unavoidable)	Similar (Significant Unavoidable)
Odors	Less Than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
3. Biological Resources					
Special Status Species	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Sensitive Plant Communities	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Jurisdictional Resources	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)

Table 5-9 (Continued)

Comparative Impact Summary

	Project Impact	Alternative 1: No Project/ No Build	Alternative 2: Reduced Intensity Alternative	Alternative 3: Code Compliant Commercial Alternative	Alternative 4: Code Compliant Light Industrial/Warehouse Alternative
Wildlife Movement	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Oak Woodlands or Unique Native Trees	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
4. Cultural Resource					
Archaeological Resources	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Paleontological Resources	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
5. Geology					
Geologic Hazard Effects	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
6. Greenhouse Gas Emissions					
Construction Emissions	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Significant Unavoidable)	Less (Significant Unavoidable)
Operational Emissions	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Significant Unavoidable)	Less (Significant Unavoidable)
Compliance with Plans	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Greater (Significant Unavoidable)	Greater (Significant Unavoidable)

Table 5-9 (Continued)

Comparative Impact Summary

	Project Impact	Alternative 1: No Project/ No Build	Alternative 2: Reduced Intensity Alternative	Alternative 3: Code Compliant Commercial Alternative	Alternative 4: Code Compliant Light Industrial/Warehouse Alternative
7. Hydrology and Water Quality					
Water Quality	Less than Significant	Greater (Less than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Drainage Patterns and Stormwater Drainage	Less than Significant	Less (Less than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
8. Land Use and Planning					
County Plan & Policy Compliance	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
County Code Compliance	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
9. Noise					
On-Site Construction	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Off-Site Project Construction Activities	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
On-Site Operational Activities	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Off-Site Operational Activities	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)
10. Fire Protection and Emergency Services					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

Table 5-9 (Continued)

Comparative Impact Summary

	Project Impact	Alternative 1: No Project/ No Build	Alternative 2: Reduced Intensity Alternative	Alternative 3: Code Compliant Commercial Alternative	Alternative 4: Code Compliant Light Industrial/Warehouse Alternative
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
11. Sheriff Protection					
Construction	Less than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
12. Transportation and Parking					
Intersections	Significant Unavoidable	Less (No Impact)	Less (Less than Significant)	Greater (Significant Unavoidable)	Less (Less Than Significant)
Congestion Management	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
Traffic Hazards	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Emergency Access	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
Plan and Policy Consistency	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
13. Wastewater					
Wastewater Collection	Less than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
Wastewater Treatment	Less than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)

Table 5-9 (Continued)

Comparative Impact Summary

	Project Impact	Alternative 1: No Project/ No Build	Alternative 2: Reduced Intensity Alternative	Alternative 3: Code Compliant Commercial Alternative	Alternative 4: Code Compliant Light Industrial/Warehouse Alternative
14. Water Supply					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)

Note: Statements not in parentheses indicate whether impacts would be Similar, Less, or Greater than the Project. Statements in parentheses indicate whether for the identified Alternative there would be (No Impact), (Less than Significant), (Less than Significant with Mitigation), or (Significant Unavoidable) impacts.

Source: PCR Services Corporation, August 2015

Table 5-10

Comparison of Alternatives - Ability to Achieve Project Objectives

PROJECT OBJECTIVES	Proposed Project	Alternative 1: No Project/Build Alternative	Alternative 2: Reduced Intensity Alternative	Alternative 3: Code Compliant Commercial Alternative	Alternative 4: Code Compliant Light Industrial/ Warehouse Alternative
Underlying Project Purpose and Primary Objective					
Provide for the development of a high-quality, integrated development of complementary commercial retail establishments and hotels that promotes economic growth and jobs creation within a commercial and light industrial corridor.	Fully Achieves Purpose & Objective	Does Not Achieve Purpose & Objective	Partially Achieves Purpose & Objective	Partially Achieves Purpose & Objective	Does Not Achieve Purpose & Objective
Commercial/Retail Objectives					
1. Address the existing shortage of commercial retail options in the Project area (i.e., the southeastern San Gabriel Valley), and expand the variety of such options to serve Rowland Heights community residents.	Fully Achieves Objective	Does Not Achieve Objective	Partially Achieves Objective	Fully Achieves Objective	Does Not Achieve Objective
2. Locate new commercial development in close proximity to existing commercial and light industrial uses to avoid displacing residential uses or introducing incompatible land uses, but in close proximity to the existing residential population south of the Project Site and SR-60, and the existing daytime employee population to the north, east, and west.	Fully Achieves Objective	Does Not Achieve Objective	Fully Achieves Objective	Fully Achieves Objective	Does Not Achieve Objective
3. Take advantage of the large buildable lot area to develop a high-quality, low-rise commercial center with a diversity of tenant spaces (retail, restaurant, and office space on two floors) to attract high-quality tenants.	Fully Achieves Objective	Does Not Achieve Objective	Partially Achieves Objective	Fully Achieves Objective	Does Not Achieve Objective
4. Ensure a variety of commercial uses are accommodated — including retail, restaurant, and office uses — to provide a range of goods and services to the community.	Fully Achieves Objective	Does Not Achieve Objective	Partially Achieves Objective	Fully Achieves Objective	Does Not Achieve Objective

Table 5-10 (Continued)

Comparison of Alternatives - Ability to Meet Project Objectives

PROJECT OBJECTIVES	Proposed Project	Alternative 1: No Project/Build Alternative	Alternative 2: Reduced Intensity Alternative	Alternative 3: Code Compliant Commercial Alternative	Alternative 4: Code Compliant Light Industrial/ Warehouse Alternative
5. Promote and support local, regional, and State mobility objectives to reduce vehicle miles traveled and infrastructure costs by siting new commercial infill development in proximity to existing local bus lines and a commuter rail station and providing facilities to support and encourage the use of bicycles.	Fully Achieves Objective	Does Not Achieve Objective	Fully Achieves Objective	Fully Achieves Objective	Does Not Achieve Objective
Hotel Objectives					
1. Accommodate the growing need for hotel options and meeting facilities that meet corporate and commercial demand generated by businesses in the San Gabriel Valley, leisure and tour group demand generated by pleasure travelers in the San Gabriel Valley and larger Los Angeles area, and group demand for social events and business and association meetings.	Fully Achieves Objective	Does Not Achieve Objective	Partially Achieves Objective	Does Not Achieve Objective	Does Not Achieve Objective
2. Provide a high-quality extended stay hotel in the currently underserved eastern San Gabriel Valley market where no comparable hotel product exists and demand for longer-term stays for family vacationers and business travelers is increasing.	Fully Achieves Objective	Does Not Achieve Objective	Partially Achieves Objective	Does Not Achieve Objective	Does Not Achieve Objective
3. Provide business travelers with local options for hotel stays, thereby reducing vehicle miles traveled.	Fully Achieves Objective	Does Not Achieve Objective	Fully Achieves Objective	Does Not Achieve Objective	Does Not Achieve Objective
4. Site proposed new mid-rise hotels in a high-visibility location with freeway access.	Fully Achieves Objective	Does Not Achieve Objective	Fully Achieves Objective	Does Not Achieve Objective	Does Not Achieve Objective

Table 5-10 (Continued)

Comparison of Alternatives - Ability to Meet Project Objectives

PROJECT OBJECTIVES	Proposed Project	Alternative 1: No Project/Build Alternative	Alternative 2: Reduced Intensity Alternative	Alternative 3: Code Compliant Commercial Alternative	Alternative 4: Code Compliant Light Industrial/ Warehouse Alternative
5. Co-locate complementary hotel uses (at a height and scale appropriate for the commercial/industrial corridor in which the Project Site is situated, in conformance with Development Program review criteria) and commercial uses, including retail and restaurant uses, to provide local shopping and dining options for hotel guests.	Fully Achieves Objective	Does Not Achieve Objective	Fully Achieves Objective	Does Not Achieve Objective	Does Not Achieve Objective
Siting and Design Objectives					
1. Create an activity node for the Project area, and ensure a consistently high level of pedestrian activity during the day and the evening, by co-locating a sufficiently diverse concentration of hotels and commercial uses with different peak activity periods.	Fully Achieves Objective	Does Not Achieve Objective	Partially Achieves Objective	Does Not Achieve Objective	Does Not Achieve Objective
2. Maximize efficient use of the Project Site through the use of shared parking that accommodates peak demand for on-site uses.	Fully Achieves Objective	Does Not Achieve Objective	Fully Achieves Objective	Fully Achieves Objective	Does Not Achieve Objective
3. Incorporate underground structured parking to minimize lot coverage dedicated to surface parking and take advantage of the natural slope of the Site.	Fully Achieves Objective	Does Not Achieve Objective	Fully Achieves Objective	Fully Achieves Objective	Does Not Achieve Objective
4. Enhance the pedestrian experience along Gale Avenue, and provide street-level pedestrian connectivity to the Project Site through the provision of landscaped setbacks on the Project's street frontage, landscaped pedestrian walkways through the Project Site, and a dedicated pedestrian connection separate from vehicle driveways.	Fully Achieves Objective	Does Not Achieve Objective	Fully Achieves Objective	Fully Achieves Objective	Partially Achieves Objective

Table 5-10 (Continued)

Comparison of Alternatives - Ability to Meet Project Objectives

PROJECT OBJECTIVES	Proposed Project	Alternative 1: No Project/Build Alternative	Alternative 2: Reduced Intensity Alternative	Alternative 3: Code Compliant Commercial Alternative	Alternative 4: Code Compliant Light Industrial/ Warehouse Alternative
5. Provide on-site common open space amenities in response to community input related to visual enhancement of the parking field and for the use of Project patrons and employees.	Fully Achieves Objective	Does Not Achieve Objective	Fully Achieves Objective	Fully Achieves Objective	Partially Achieves Objective
Economic and Employment Objectives					
1. Create a viable mix of complementary retail, office, and hotel uses, of a sufficient size to create internal synergy and attract outside patrons.	Fully Achieves Objective	Does Not Achieve Objective	Does Not Achieve Objective	Does Not Achieve Objective	Does Not Achieve Objective
2. Contribute to the economic health of the Rowland Heights community through jobs creation, including short-term construction trade jobs and long-term service and professional employment opportunities.	Fully Achieves Objective	Does Not Achieve Objective	Partially Achieves Objective	Partially Achieves Objective	Partially Achieves Objective
3. Generate revenue for the County through net new sales and room taxes.		Does Not Achieve Objective	Partially Achieves Objective	Partially Achieves Objective	Does Not Achieve Objective

Source: PCR Services Corporation, August 2015

6. OTHER CEQA CONSIDERATIONS

6.0 OTHER CEQA CONSIDERATIONS

A. SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the State *CEQA Guidelines* requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less-than-significant level. Following is a summary of the impacts associated with the Project that were determined to be significant and unavoidable. These impacts are also described in detail in their respective technical sections within Chapter 4.0, Environmental Impact Analysis, of this Draft EIR.

1. Air Quality (Operation)

Project operation, specifically operational traffic trips following buildout of Phase 1 and full buildout of both Project phases, would result in pollutant emissions above the South Coast Air Quality Management District's (SCAQMD) threshold of significance for regional emissions of volatile organic compounds (VOC) and NO_x. Additionally, Project operations following buildout of Phase 1, considered simultaneously with construction of Phase 2, would result in short-term emissions levels above SCAQMD significant thresholds for VOCs and NO_x for the duration of Phase 2 construction.

Vehicle trip reductions due to internal capture (resulting from the collocation of the proposed mix of uses) and reliance on mass transportation have already been accounted for in the mobile source emission calculations. No additional feasible mitigation measures are available to further reduce emissions; accordingly, the emission levels above the thresholds result in potentially significant and unavoidable impacts.

2. Transportation and Parking (Operation)

As analyzed in Section 4.K, Transportation and Parking, of this Draft EIR, the Project would result in potentially significant impacts at six intersections under the Future (2020) With Project Plus Cumulative Condition. Impacts at one of these intersections would be reduced by planned roadway improvements currently under construction as part of the Nogales Street Grade Separation Project. Impacts at three intersections would be reduced to less-than-significant levels by mitigation measures that stipulate the Project Applicant's required fair-share contribution to the cost of physical improvements at the impacted intersections. However, mitigation at two of the significantly impacted intersections would require right-of-way acquisition, which is infeasible since these intersections are fully built out. Impacts at the following two intersections, therefore, are considered significant and unavoidable.

4. Fullerton Road & Colima Road
 - LOS C (0.747) to LOS C (0.765), an increase in the V/C ratio of 0.043 during the Saturday mid-day peak hour.

18. Nogales Street & Colima Road
 - LOS B (0.694) to LOS C (0.738), an increase in the V/C ratio of 0.044 during the Saturday mid-day peak hour.

B. REASONS WHY THE PROJECT IS BEING PROPOSED, NOTWITHSTANDING SIGNIFICANT UNAVOIDABLE IMPACTS

In addition to identification of the Project's significant unavoidable impacts, Section 15126.2(b) of the State *CEQA Guidelines* also requires a description of the reasons why a project is proposed, notwithstanding significant unavoidable impacts associated with the project.

The reasons this Project is proposed, notwithstanding its significant and unavoidable impacts, are tied to the purpose and objectives of the Project described in Chapter 2.0, Project Description, of this Draft EIR. The primary purpose and objective of the Project is to allow for the development of a commercial mixed-use project that promotes economic growth and jobs creation within an established commercial and light industrial corridor.

With respect to the individual Project objectives cited in Chapter 2.0, Project Description, the proposed development of this Project Site is intended to fulfill specific objectives related to the provision of commercial/retail uses and hotels within the Rowland Heights community, and to achieve site and architectural design characteristics consistent with adopted plans. With respect to the proposed commercial/retail uses, the Project is intended to:

1. Address the existing shortage of commercial retail options in the Project area (i.e., the southeastern San Gabriel Valley), and expand the variety of options for Rowland Heights community residents;
2. Locate new commercial development in close proximity to existing commercial and light industrial uses to avoid displacing residential uses or introducing incompatible land uses, but in close proximity to the existing residential population south of the Project Site and Pomona Freeway (SR- 60), and the existing daytime employee population to the north, east, and west;
3. Take advantage of the large buildable lot area to develop a high-quality, low-rise commercial center with a diversity of tenant spaces (retail, restaurant, and office space on two floors) to attract high-quality tenants;
4. Ensure a variety of commercial uses are accommodated — including retail, restaurant, and office uses — to provide a range of goods and services to the community; and
5. Promote and support local, regional, and State mobility objectives to reduce vehicle miles traveled and infrastructure costs, by siting new commercial infill development in proximity to existing local bus lines and a commuter rail station and providing facilities to support and encourage the use of bicycles.

With respect to the proposed hotels, the Project is intended to:

1. Accommodate the growing need for hotel options and meeting facilities that meet corporate and commercial demand generated by businesses in the San Gabriel Valley, leisure and tour group demand generated by pleasure travelers in the San Gabriel Valley and larger Los Angeles area, and group demand for social events and business and association meetings;

2. Provide a high-quality extended stay hotel in the currently underserved eastern San Gabriel Valley market where no comparable hotel product exists and demand for longer-term stays for family vacationers and business travelers is increasing;
3. Provide business travelers with local options for hotel stays, thereby reducing vehicle miles traveled;
4. Site proposed new mid-rise hotels in a high-visibility location with freeway access; and
5. Co-locate complementary hotel uses (at a height and scale appropriate for the commercial/industrial corridor in which the Project Site is situated, in conformance with Development Program review criteria) and commercial uses, including retail and restaurant uses, to provide local shopping and dining options for hotel guests.

With respect to the siting and design of buildings and amenities on the Project Site, the Project seeks to:

1. Create an activity node for the Project area and ensure a consistently high level of pedestrian activity during the day and the evening, by co-locating a sufficiently diverse concentration of hotels and commercial uses with different peak activity periods.
2. Maximize efficient use of the Project Site through the use of shared parking that accommodates peak demand for on-site uses;
3. Incorporate underground structured parking to minimize lot coverage dedicated to surface parking and take advantage of the natural slope of the Site;
4. Enhance the pedestrian environment along Gale Avenue, and provide street-level pedestrian connectivity to the Project Site through the provision of landscaped setbacks on the Project's street frontage, landscaped pedestrian walkways through the Project Site, and a dedicated pedestrian connection separate from vehicle driveways; and
5. Provide on-site common open space amenities in response to community input related to visual enhancement of the parking field and for the use of Project patrons and employees.

With respect to the economy and employment, the Project seeks to:

1. Create a viable mix of complementary retail, office, and hotel uses of a sufficient size to create internal synergy and attract outside patrons;
2. Contribute to the economic health of the Rowland Heights community through jobs creation, including short-term construction trade jobs and long-term service and professional employment opportunities; and
3. Generate revenue for the County through net new sales and room taxes.

The Project's significant and unavoidable impacts reflect the fact that the Project proposes redevelopment of a site formerly used for agricultural cultivation (through the mid-1990s); the Site is currently undeveloped except for the detour road and related construction access and staffing facilities constructed by the Alameda

Corridor-East Construction Authority (ACE) as part of the Nogales Street Grade Separation Project. Because the Project Site is vacant, all Project-generated trips are new trips that will be added to the roadway system. As previously stated, trip reductions related to internal capture (resulting from the collocation of the proposed mix of uses) and reliance on mass transportation have already been accounted for in determining the Project's trip generation and mobile source emission calculations. Moreover, the two intersections that are projected to be significantly and unavoidably impacted would operate at acceptable levels of service even with the addition of Project trips.

The Project represents infill development within an otherwise entirely builtout, urbanized environment. The Project Site is surrounded on three sides by commercial development, with light industrial/warehousing uses to the north. The shared Union Pacific Railroad Los Angeles Subdivision/Metrolink Riverside Line (UPRR/Metrolink) tracks bound the Site on the north, and Gale Avenue forms the southern boundary. Gale Avenue is an important east-west road that parallels SR-60 for 5.5 miles between Hacienda Heights and Nogales Street on the west, and carries between 10,900 and 19,500 vehicles per day. The Project Site is one-half mile from the Nogales Street entrance/exit ramps for SR-60, and the freeway runs 75 and 300 feet south of the Project Site. The Site is within a block of several bus lines and approximately 2.7 miles from the Metrolink Industry Station.

The Project Site land use classification is Major Industrial per the County's adopted 1980 General Plan land use map and Industrial per the Rowland Heights Community Plan, which denotes land designated for manufacturing, warehousing, and heavy commercial uses. Existing site zoning is M-1.5-BE (Restricted Heavy Manufacturing, Billboard Exclusion), which permits a broad range of industrial and commercial uses, including most commercial uses permitted in the C3 Unlimited Commercial zone. These land use and zoning designations reflect the County's longstanding expectation that the Project Site would be developed with uses similar to and/or compatible with those within unincorporated Rowland Heights to the east and City of Industry land uses to the north and west. The proposed development of this Project Site would avoid displacement of recreational open space, existing residential uses, and existing commercial uses, and thus would not disrupt existing land use patterns in the area. For these reasons, the Project's significant and unavoidable impacts would be balanced by the provision of a diversity of goods and services in proximity to sizeable daytime employee populations to the north, east, and west and a sizeable residential population to the south. The Project would produce land uses that are physically and operationally compatible with neighboring land uses.

Four alternatives to the Project are considered in Chapter 5.0, Alternatives, of this Draft EIR. The alternatives analysis reviews a range of potential projects that might otherwise occur at the Project Site. They include a No Project/No Build Alternative, a Reduced Density Alternative, and two Code-Compliant Alternatives that consider other proposed uses on the Project Site.

Among those alternatives, no feasible alternative was identified that would avoid the Project's significant unavoidable impacts. The Reduced Density Alternative, which has been identified as the environmentally superior alternative, would reduce the potential for significant unavoidable operational traffic impacts and air quality impacts. However, significant unavoidable traffic impacts would still occur at one or more intersections. As discussed in more detail in Chapter 5.0, Alternatives, while the Reduced Density Alternative is considered the environmentally superior alternative, it would only partially meet the primary purpose and objectives of the Project, which are stated and enumerated in Subsection B above.

C. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

According to Sections 15126(c) and 15126.2(c) of the State *CEQA Guidelines*, an EIR is required to address any significant irreversible environmental changes that would occur should the proposed Project be implemented. As stated in CEQA Guidelines Section 15126.2(c) indicates:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.

The Project would necessarily consume limited, slowly renewable, and nonrenewable resources. This consumption would occur during the construction phase of the Project and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: 1) building materials, 2) fuel and operational materials/resources, and 3) the transportation of goods and people to and from the Project Site. Project construction would require the consumption of resources that are nonreplenishable or may renew so slowly as to be considered nonrenewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel, and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and oil would be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the Project Site.

Project operation would continue to expend nonrenewable resources, including energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the Project, and the existing, finite supplies of these natural resources would be incrementally reduced.

Because the Project is intended to attract commercial and corporate travelers, pleasure and tourist travelers, and groups seeking facilities that could host social events and business and association meetings, the Project would contribute to a land use pattern that would reduce reliance on private automobiles and the consumption of nonrenewable resources when considered in a larger context. The Project would provide new full-service and extended-stay hotel accommodations, as well as a range of commercial uses along a mixed-use corridor containing commercial, restaurant, office, and hotel uses, and in close proximity to a freeway and exit/entrance ramps.

The Project area supports a large daytime employee population to the north, east, and west, and these people can be anticipated to patronize the Project's commercial retail and restaurant uses. Also, residents of neighborhoods to the south are expected to patronize the retail, restaurant, office, and hotel uses. The Site is also near public transit and would support pedestrian and bicycle access to a considerable range of employment, retail, and entertainment activities. These factors would contribute to an integrated land use pattern that would allow people to easily access complementary goods and services and thus reduce consumption of nonrenewable resources due to multipurpose trips.

Furthermore, the Project would include design features and be subject to building regulations that would reduce the demands for energy resources needed to support Project operation. The Project would comply with the Los Angeles County Green Building Program and is required by County regulations to achieve LEED® Silver-level certification or the equivalent. The analysis of Project impacts on greenhouse gas emissions in Section 4.F, Greenhouse Gas Emissions of this Draft EIR and the discussion of Energy, below, discuss State efforts to reduce greenhouse emissions, which also requires concurrent reductions in the consumption of nonrenewable resources.

Continued use of such nonrenewable resources would be on a relatively small scale and consistent with regional and local growth forecasts in the area, as well as State and local goals for reductions in the consumption of such resources. Furthermore, the Project would not affect access to existing resources nor interfere with the production or delivery of such resources. The Project Site contains no energy resources; thus, the Project would not preclude future use of such on-site resources. The Project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant.

D. ENERGY

Section 21100(b) of the State *CEQA Guidelines* requires that an EIR include a detailed statement setting forth mitigation measures proposed to minimize a project's significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Appendix F of the State *CEQA Guidelines* states that in order to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered in an EIR, to the extent relevant and applicable to the project. Appendix F further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the Project Description, Environmental Setting, and Impact Analysis portions of technical sections, as well as through mitigation measures and alternatives.

In accordance with Appendix F of the State *CEQA Guidelines*, this Draft EIR includes relevant information and analyses that address the energy implications of the Project. This section represents a summary of the Project's anticipated energy needs, impacts, and conservation measures. Information found herein, as well as other aspects of the Project's energy implications, are discussed in greater detail elsewhere in this Draft EIR, including in Chapter 2.0, Project Description, and Sections 4.F, Greenhouse Gas Emissions, and 4.K, Transportation and Parking.

1. Construction-Related Energy Consumption

As discussed in Chapter 2.0, Project Description, the Project is proposed to be constructed in two phases. The first phase provides for a 30-month buildout of Parcel 1, the Commercial Center, and the full-service Hotel A and associated subterranean parking. Phase 2 consists of the subsequent 22-month buildout of Parcel 3, extended-stay Hotel B and associated subterranean parking. Construction of the two phases may overlap or be consecutive, depending on market conditions. However, to evaluate the worst-case scenario, the analysis has assumed that two phases would be built simultaneously. Approximately 11,800 cubic yards and 36,500 cubic yards of soil would be exported during the grading phases of Phase 1 and Phase 2, respectively, of Project construction for off-site disposal.

Estimated Energy Consumption

The grading, foundation, building construction, finishing, and paving phases would last for approximately 30 months for Phase 1 and 22 months for Phase 2. These activities would generate soil and debris requiring off-site disposal. Heavy-duty construction equipment associated with grading and construction activities would include diesel-fueled loaders and haul trucks. It is estimated that approximately 843 one-way truck trips for Phase 1 and 2,608 trips for Phase 2 would be required to haul the grading material to off-site recycling and disposal facilities in the region. Grading would last for approximately five months and cover both sites. Heavy-duty construction equipment associated with these activities would include diesel-fueled air compressors, backhoes, dozers, excavators, loaders, haul trucks, and drill rigs. Vendor trips would be required to deliver building materials and equipment to the Site. According to the California Emissions Estimator Model (CalEEMod), approximately 118 vendor trucks for Phase 1 and 32 trucks for Phase 2 would occur on a representative worst-case day during building construction. Conservatively assuming that the number of vendor truck trips during a representative worst-case day would occur every day throughout the foundation, building construction, and finishing subphases, approximately 41,000 total one-way trips would occur during Phase 1 and 9,050 trips during Phase 2. Based on the number of truck trips described above, construction of the Project would use approximately 51,910 gallons of diesel fuel for Phase 1 and 19,900 gallons for Phase 2 resulting in a Project total of 71,800 gallons for hauling of grading and excavation materials, and vendor deliveries.¹

Heavy-duty construction equipment associated with grading, excavation, and building construction would include excavators, graders, tractors/loaders/backhoes, bore/drill rigs, dozers, cranes, air compressors, cranes, forklifts, pumps, and pavers. The majority of the equipment would likely be diesel-fueled; however, smaller equipment, such as air compressors and forklifts may be electric-, gas-, or natural gas-fueled. Based on the number and type of construction equipment that would be used during Project construction, and based on the estimated duration of construction, heavy-duty construction equipment would consume approximately 53,900 gallons of diesel fuel for Phase 1 and 38,000 gallons for Phase 2 resulting in a Project total of 92,000 gallons.²

Construction equipment fuels (diesel, gas, or natural gas) would be provided by local or regional suppliers and vendors. Electricity, when needed, would be supplied by the local utility provider (Southern California Edison).

Electricity use during construction would be variable depending on lighting needs and the use of electric-powered equipment. Electricity used to provide power for lighting and electronic equipment (e.g., computers, etc.) inside temporary construction trailers and for lighting for general construction activity would be temporary and generally negligible.

The number of construction workers that would be required would vary based on the phase of construction and activity taking place. The transportation fuel required by construction workers would depend on the total number of worker trips estimated for the duration of construction activity. A 2009 study by the

¹ Fuel consumption is estimated based on fuel consumption factors in the EMFAC2011 on-road vehicle emissions model for heavy-heavy-duty construction trucks and trip distances in the California Emissions Estimator Model (CalEEMod).

² Fuel consumption is estimated based on fuel consumption factors in the OFFROAD2011 emissions model and the equipment horsepower and load factor ratings in CalEEMod.

California Department of Transportation (Caltrans) found that the Statewide average fuel economy for automobiles would be 22.513 miles per gallon in 2015.³ Assuming construction worker vehicles have an average fuel economy consistent with the Caltrans study, based on the maximum projected number of workers during each phase, the Project would use approximately 73,500 gallons of gasoline for construction worker trips during Phase 1 and approximately 18,000 gallons during Phase 2 resulting in a Project total of 91,500 gallons.⁴

In 2013, California consumed 341,194 thousand barrels of gasoline for transportation, which is equivalent to a total annual consumption of 14.3 billion gallons by the transportation sector.⁵ For diesel, California consumed 75,872 thousand barrels for transportation, which is equivalent to a total annual consumption of 3.2 billion gallons by the transportation sector.⁶ Based on the fuel usage amounts presented above, construction of the Project would use approximately 91,500 gallons of gasoline and 163,800 gallons of diesel, assuming heavy-duty construction equipment is primarily diesel fueled. This would represent about 0.00001 percent of the Statewide annual gasoline consumption and 0.0001 percent of the Statewide annual diesel consumption.

Energy Conservation: Regulatory Compliance

The Project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment (see Appendix B of this Draft EIR). As discussed in Section 4.B, Air Quality of this Draft EIR, CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling to reduce public exposure to diesel particulate matter and other toxic air contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))⁷ to reduce NO_x, PM₁₀, and PM_{2.5} emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets.

³ California Department of Transportation, 2008 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, 2009.

⁴ Fuel consumption is estimated based on fuel consumption factors in the EMFAC2011 on-road vehicle emissions model for heavy-heavy-duty construction trucks and trip distances in the California Emissions Estimator Model (CalEEMod).

⁵ U.S. Energy Information Administration, Table F3: Motor Gasoline Consumption, Price, and Expenditure Estimates, 2013, http://www.eia.gov/state/seds/data.cfm?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=US. Accessed May 2015.

⁶ U.S. Energy Information Administration, Table F7: Distillate Fuel Oil Consumption Estimates, 2013, http://www.eia.gov/state/seds/data.cfm?incfile=/state/seds/sep_fuel/html/fuel_use_df.html&sid=US. Accessed May 2015.

⁷ California Air Resources Board, Final Regulation Order, Title 13, California Code of Regulations, Division 3, Chapter 1, Section 2025, Regulations to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, <http://www.arb.ca.gov/msprog/onrdiesel/documents/TBFinalReg.pdf>. Accessed May 2015.

Compliance with the above anti-idling and emissions regulations would result in more efficient use of construction-related energy and minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in reduced fuel combustion and energy consumption, as would use of haul trucks with larger capacities, as previously stated.

With respect to energy conservation and solid waste, the County of Los Angeles Construction and Demolition Debris Recycling and Reuse ordinance (Title 20, Division 4, Chapter 20.87) generally requires that at least 50 percent of construction and demolition debris be recycled or reused. The County is in the process of developing a roadmap to increase the target to 70 percent for mixed debris and 100 percent for asphalt and concrete. Overall, the County has proposed long-term disposal reduction targets of 80 percent diversion from landfills by 2025 and 95 percent by 2045.⁸ The Project would utilize construction contractors in compliance with applicable waste-reduction County ordinances. Through compliance with applicable County regulations and contracting with approved waste haulers, the Project would achieve, at a minimum, the required 50 percent or more waste recycling and reuse rate for construction and demolition debris and thus decrease construction-related energy consumption associated with building materials and disposal of construction debris.

Energy Conservation: Project Design Features

The Project would be designed to meet the standards for Leadership in Energy and Environmental Design (LEED®) Silver Certification by the U.S. Green Building Council (USGBC) through the incorporation of green building techniques and other sustainability features. Key Project Design Features that would contribute to energy efficiencies include the use of glass/window areas for ventilation and daylight accessibility, and landscaping of roof decks. Other building features would include stormwater retention; installation of heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; use of materials and finishes that emit low quantities of VOCs; use of high-efficiency fixtures and appliances, water conservation features; and recycling of solid wastes. The Project would also be designed to comply with the County of Los Angeles Green Building Standards and LID requirements. The following Project Design Features would reduce energy consumption:

PDF-AQ-1: The Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and achieve the equivalent of USGBC LEED® Silver Certification. These measures would also include consistency with Los Angeles County Green Building Standards and Low Impact Development requirements. The Project would incorporate measures and performance standards which include but are not limited to the following:

- The Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous construction debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area.
- The Project would be designed to optimize energy performance and reduce building energy cost by 10 percent for new construction compared to ASHRAE 90.1-2010, Appendix G, and the Title 24 Building Standards Code.

⁸ County of Los Angeles Department of Public Works, *Roadmap to a Sustainable Waste Management Future*, October 2014.

- The Project would reduce indoor water use by a minimum of 35 percent by installing water fixtures that exceed applicable standards.

2. Operation and Maintenance Energy Consumption

The Project would result in redevelopment of a vacant site with a mixed-use hotel and retail project. Because the Project would be located on an urban infill site, the need for construction of new supporting infrastructure such as roads, utilities, and piping would be minimized. In addition, with respect to siting of the Project in relation to other land uses, the Project would be adjacent to existing residential, commercial, office, and industrial uses, which would help to reduce regional vehicle miles traveled (VMT) for Project customers. The Project would be located in an area well served by existing and future public transportation, which would further reduce VMT.

Anticipated Energy Consumption

The daily operation of the Project would generate demand for electricity, natural gas, and water, and the generation of wastewater requiring conveyance, treatment, and disposal off-site, and solid waste requiring disposal off site. Southern California Edison would provide electricity, Rowland Water District water, and the Southern California Gas Company natural gas. In fiscal year ending December 2013, Southern California Edison clients consumed 87.4 billion kilowatt-hours (kWh), with an end-use sector breakdown of 40.6 billion kWh for the commercial sector, 29.9 billion kWh for residential, 8.4 billion for industrial, and 8.3 billion for other sectors.⁹ In 2013, customer in the Southern California Gas Company' service area consumed approximately 5,200 billion therms of natural gas, equivalent to approximately 520 trillion kilo British thermal units (kBtu).¹⁰

Based on engineering estimates used as the basis for GHG emissions calculations, the initial operational year of the Project would have an electricity demand of approximately 7 million kWh per year, inclusive of approximately 388,240 kWh for water supply and wastewater treatment (see Appendix E of this Draft EIR). To put this number into perspective, this represents approximately 0.001 percent of the Southern California Edison's network demand for the year ending December 2013, which is a very small fraction of the Southern California Edison network. Based on engineering estimates used as the basis for GHG emissions calculations, the initial operational year of the Project would have a natural gas demand of approximately 15.4 million kBtu per year (see Appendix E of this Draft EIR). This represents approximately 0.00000003 percent of the Southern California Gas Company network demand.

Alternative Energy Considerations

The use of energy provided by alternative (renewable) resources, off site and on site, to meet the Project's operational demands is constrained by the energy portfolio mix managed by Southern California Edison and limitations on the availability or feasibility of on-site energy generation.

⁹ Edison International, *Financial and Statistics Report, 2013*, https://www.edison.com/content/dam/eix/documents/investors/sec-filings-financials/2013_Financial%26Statistical_Report.pdf. Accessed November 2014.

¹⁰ California Gas and Electric Utilities, *2014 California Gas Report*, <http://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf>. Accessed May 2015.

Southern California Edison is required to commit to the use of renewable energy sources for compliance with the California Renewable Energy Resources Act. Southern California Edison has committed to meeting the requirement to procure at least 33 percent of its energy portfolio from renewable sources by 2020 through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources defined in the 2013 Renewable Portfolio Standard include biodiesel; biomass; hydroelectric and small hydro (30 megawatts [MW] or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multifuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and “other renewables that may be defined later.” As of 2014, the most recent year for which data are available, Southern California Edison’s renewable energy resources included geothermal, small hydro, wind, solar, and biomass, which accounted for 23.5 percent of its overall energy mix. This represents the available off-site renewable sources of energy that would meet Project demand.¹¹

With respect to on-site renewable energy sources, because of the Project’s urban location, no known local energy sources exist.

Solar and wind power represent variable-energy, or intermittent, resources that are generally used to augment, but not replace, natural gas-fired energy power generation. Reliability of energy availability and transmission is necessary to meet demand, which is constant.

Wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. The California Energy Commission (CEC) studied the State’s high wind resource potential.¹² Based on a map of California’s wind resource potential, the Project site is not identified as an area with wind resource potential. Wind resource areas with winds above 12 mph within Los Angeles County are located in relatively remote areas in the northwestern portion of the County. Additionally, no viable sites exist on the Project Site for the placement and operation of a wind turbine.

Similarly, solar energy is highly variable in the Los Angeles area, particularly in proximity to the coastline where there is increased cloud cover, and is therefore not cost-effective as a primary source of energy. The CEC has identified areas within California with high potential for viable solar, wind, and geothermal energy production. The CEC rated California’s solar potential by county using insolation values available to typical photovoltaic system configurations, as provided by the National Renewable Energy Laboratory. Although Los Angeles as a County has a relatively high photovoltaic potential of 3,912,346 megawatt-hours (MWh)/day, inland counties such as Inyo (10,047,177 MWh/day), Riverside (7,811,694 MWh/day), and San Bernardino (25,338,276 MWh/day) are more suitable for large-scale solar power generation.¹³ In addition, most of the high potential areas of greater than 6 KWh/sqm/day in Los Angeles County are concentrated in

¹¹ California Public Utilities Commission, *California Renewables Portfolio Standard (RPS)*, <http://www.cpuc.ca.gov/PUC/energy/Renewables/>. Accessed February 2015.

¹² California Energy Commission, *California Wind Resource Potential*, http://www.energy.ca.gov/maps/renewable/wind/WindResource_Potential.pdf. Accessed May 2015.

¹³ California Energy Commission, *California Solar Resources, April 2005*, <http://www.energy.ca.gov/2005publications/CEC-500-2005-072/CEC-500-2005-072-D.PDF>. Accessed May 2015.

the northeastern corner of the County around Lancaster, approximately 40 miles away from the Project Site. While these facts alone do not preclude its use in the Project area or on the Project Site, the proposed Project's plans to utilize roof decks and other common areas for public and private open space and recreational amenities would limit the potential for solar panel arrays of any meaningful size.

Energy Conservation: Regulatory Compliance

The CEC first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Part 11 of the Title 24 Building Standards Code is referred to as the California Green Building Standards Code (CalGreen). The purpose of the CalGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: 1) planning and design; 2) energy efficiency; 3) water efficiency and conservation; 4) material conservation and resource efficiency; and 5) environmental air quality."¹⁴ As of January 1, 2011, the CalGreen Code is mandatory for all new buildings constructed in the state. The CalGreen Code establishes mandatory measures for new residential and nonresidential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.¹⁵ The CalGreen Code was most recently updated in 2013 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on July 1, 2014.¹⁶ The Project would comply with the applicable provisions of Title 24 and the CalGreen Code.

Solid Waste Regulatory Disposal Requirements

The Project Applicant is required to comply with applicable regulations pertaining to solid waste reduction and recycling. The State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939) to improve solid waste disposal management with respect to 1) source reduction, 2) recycling and composting, and 3) environmentally safe transformation and land disposal. AB 939 mandates that jurisdictions meet a diversion goal of 50 percent by 2000 and thereafter and requires that all counties and cities develop a comprehensive solid waste management program that includes a Source Reduction and Recycling Element (SRRE) to address waste characterization, source reduction, recycling, composting, solid waste facility capacity, education and public information, funding, special waste (asbestos, sewage sludge, etc.), and household hazardous waste. It also requires counties to develop a Siting Element that addresses the need for landfill/transformation facilities for 15-year intervals, and mandates all cities and counties to prepare and submit Annual Reports that summarize the jurisdictions' progress in reducing solid waste. Oversight of these activities, initially the responsibility of the California Integrated Waste Management Board, was transferred to CalRecycle as of January 1, 2010.

AB 1327, passed on October 11, 1991, required "CalRecycle" to develop a model ordinance for adoption of recyclable materials in development projects. Local agencies were then required to adopt the model, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in

¹⁴ *California Building Standards Commission, Title 24, California Code of Regulation, Part 11, 2013 California Green Building Standards Code (CalGreen), 2013.*

¹⁵ *Ibid.*

¹⁶ *Ibid.*

development projects by September 1, 1993. If, by that date, a local agency had not adopted its own ordinance, the model ordinance adopted by the CalRecycle took effect, to be enforced by the local agency.

Senate Bill 1374 was signed into law in 2002 to assist jurisdictions with diverting their construction and demolition (C&D) waste material. The bill called for preparation of a model C&D diversion ordinance by March 1, 2004, such model ordinance being adopted on March 16, 2004. The bill also required that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting C&D wastes.

AB 341, which took effect on July 1, 2012, was designed to help meet California's recycling goal of 75 percent by the year 2020. AB 341 makes "...a legislative declaration that it is the policy goal of the state that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020..." AB 431 requires a business, which includes a commercial or public entity that generates more than 4 cubic yards of commercial solid waste per week, to arrange for recycling services. Such businesses must 1) source separate recyclable materials from the solid waste they are discarding, and either self-haul or arrange for separate collection of the recyclables; and 2) subscribe to a service that includes mixed waste processing that yields diversion results comparable to source separation.

AB 1826, which was signed into law in September 2014, is further intended to support Statewide recycling goals by requiring the increased diversion of organic waste generated by businesses that meet certain minimum waste generation thresholds away from landfills and toward energy production, composting, or other beneficial uses. (Organic waste includes food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste.) As of April 2016, commercial entities that generate eight or more cubic yards of organic waste per week are required under AB 1826 to recycle their organic waste and contract with a landscape service to provide this service. This requirement expands to include businesses that generate four or more cubic yards of organic waste per week after January 1, 2017; businesses that generate eight or more cubic yards of commercial solid waste after January 1, 2019; and, if California has not yet met its overall diversion goals by January 1, 2020, businesses that generate two cubic yards or more of commercial solid waste. Moreover, as of January 1, 2016, local jurisdictions in California are required to implement organic waste diversion programs for businesses subject to this act. Specifically, jurisdictions are required to identify and conduct outreach to regulated waste generators using a tool developed by CalRecycle,¹⁷ ensure the availability of organic waste management options to waste generators, monitor jurisdiction-wide progress in organic waste recycling, and document and report compliance to the State.

According to the factors provided by CalRecycle, proposed Hotels A and B each have the potential to be regulated generators of organic waste, based on the likely number of employees each would require. The CalRecycle tool assumes a hotel would require 140 employees to generate eight cubic yards or more of organic waste weekly and 70 employees to generate four cubic yards or more weekly. The corresponding employee thresholds for individual restaurants (102/51 employees), food and beverage retailers (57/29 employees), retail businesses (197/99 employees), and professional/technical services uses (153/77 employees) are not as likely to be met by tenants/occupants of the Project's commercial center, but this

¹⁷ CalRecycle has developed an online Generator ID tool to assist businesses and jurisdictions to determine whether they are subject to the AB 1826 organics recycling requirements, available at: <http://www.calrecycle.ca.gov/Recycle/Commercial/Organics/GenIDInst.pdf>

cannot be ascertained with precision at this time, and therefore the potential exists for some of the commercial center uses to be subject to AB 1826.

All Project uses that qualify as regulated commercial organic waste generators would be required to comply with the requirements of AB 1826, which in turn requires the provision by the Project Applicant of adequate areas on the Project Site for the collection and removal of organic waste and at least one of the following actions by tenants/occupants of the Project Site: 1) separation at the source of organic waste from other waste and subscription to an organic waste recycling service; 2) self-recycling organic waste on-site or self-hauling organic waste for recycling; or 3) subscription to an organic waste recycling service that may include mixed-use waste processing but specifically recycles organic waste. With implementation of these actions, regulated organic waste generators on the Project Site would ensure their own, and the County's, compliance with mandatory AB 1826 requirements governing the diversion and proper disposal of organic solid waste.

Solid Waste Disposal in Los Angeles County

Pursuant to AB 939, each County is required to prepare and administer a Countywide Integrated Waste Management Plan (the aforementioned ColWMP), including preparation of an Annual Report. The ColWMP is to comprise of the counties' and cities' solid waste reduction planning documents plus an Integrated Waste Management Summary Plan (Summary Plan) and a Countywide Siting Element (CSE). The Summary Plan describes the steps to be taken by local agencies, acting independently and in concert, to achieve the mandated state diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. The County's Department of Public Works (Public Works) is responsible for preparing and administering the Summary Plan and the CSE. The Summary Plan for the County was approved by CalRecycle on June 23, 1999. The CSE was approved by "CalRecycle" on June 24, 1998. A revised CSE was completed in 2012. An EIR for this document is expected to be available for public review in 2014, with submission to CalRecycle in 2016.

In addition, as part of its regulatory efforts, the County has prepared a long-term master plan which describes how the County will manage solid waste through the year 2050. The 2050 Plan identifies measures to meet the landfill needs over the time horizon and includes such measures as conserving in-County disposal capacity, implementing waste diversion programs, fostering alternatives to landfills, and identifying funding resources to carry out the plan.

Regional planning for the provision of landfill services is provided by the County of Los Angeles which, in response to the California Integrated Waste Management Act of 1989, prepared and administers a Countywide Integrated Waste Management Plan (ColWMP). As part of its obligations, Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of ColWMP Annual Reports. Within each annual report, future landfill disposal needs over the ensuing 15-year planning horizon are addressed, in part by determining the available landfill capacity.¹⁸ As discussed in the Los Angeles County Countywide Integrated Waste Management Plan 2012 Annual Report (published in August 2013), due to lack of consumer demand for materials, slowdown in the construction industry, and the production and manufacturing of goods, the amount of waste that residents and business generated and disposed of in Los Angeles County has continued to decrease substantially since 2006 and remained low in 2012. In 2012, Los

¹⁸ *Los Angeles County Department of Public Works, Los Angeles County Integrated Waste Management Plan, 2012 Annual Report, August 2013.*

Angeles County disposed of approximately 8.8 million tons of materials, compared to approximately 12.5 million tons in 2005.¹⁹ Of that amount, the majority was accommodated by in-County Class III landfills (6.2 million tons), followed by exports to out-of-County landfills (1.8 million tons) and transformation facilities (528,765 tons). The remaining disposal capacity for the County's Class III landfills is estimated at approximately 129 million tons as of December 31, 2012.²⁰ It is estimated that in 2018 cumulative demand for disposal will be approximately 59.2 million tons, or approximately 46 percent of the remaining capacity.²¹ The 2012 average daily disposal for the landfill was 19,997 tons per day and the maximum daily capacity was 41,749 tons per day.

Of the various landfills serving the City of Los Angeles, Sunshine Canyon Landfill is the largest recipient of non-hazardous solid waste disposal materials, i.e. Class III waste materials. This landfill had a remaining capacity 74 million tons in 2012, with an expected life expectancy of 20 years. More notably, the maximum daily capacity for the landfill is 12,100 tons per day and the 2012 disposal rate was 7,107 tons per day.²² The annual amount of disposed inert waste materials, such as earth, landscaping, concrete and asphalt, in 2012 was 89,142 tons. It is estimated that that this disposal amount represents the generation of approximately 21.5 million tons with a 60 percent diversion rate.

There is one permitted Inert Waste Landfill that has a full solid waste facility permit (Azusa Land Reclamation) in Los Angeles County in 2012. The remaining capacity of this landfill is estimated at 64.2 million tons. Given the remaining permitted capacity and at the average disposal rate of 286 tons per day in 2012, this capacity would be exhausted in approximately 718 years. In addition to the County-permitted facility, there are a number of Inert Debris Engineered Fill Operation facilities operating under State permit provisions that provide additional capacity in the County, processing approximately 1.9 million tons in 2012.²³

Aggressive waste reduction and diversion programs on a countywide level have helped reduce disposal levels at the County's landfills. The County has prepared and is updating a Countywide Integrated Waste Management Plan, including annual reports and a master plan for meeting waste disposal needs through 205. The most recent Annual Report indicates that the County can adequately meet future Class III disposal needs through 2027 through scenarios that include a combination of all or some of the following: (1) expansion of existing in-County Class III landfills; (2) studying, promoting, and developing conversion technologies; (3) expansion of transfer and processing infrastructure; (4) development of a waste-by-rail system; and (5) maximization of waste reduction and recycling.²⁴

As discussed in Section 4.B, Air Quality, of this Draft EIR, the Project Applicant would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous

¹⁹ *Ibid*, Page 4, Figure 1, and page 18.

²⁰ *Ibid*, Appendix E-2, Table 1.

²¹ *Ibid*, Appendix E-2, Table 5.

²² *Ibid*, Appendix E-2, Table 1

²³ *Los Angeles County Department of Public Works, Los Angeles County Integrated Waste Management Plan, 2012 Annual Report, August 2013, Page 25, and Appendix E-2 Tables, Table 2.*

²⁴ *Los Angeles County Department of Public Works, Los Angeles County Integrated Waste Management Plan, 2012 Annual Report, August 2013, pages 44-45.*

construction debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area. Additionally, the Project would promote compliance with the California Integrated Waste Management Act of 1989 (AB 939) through source reduction and recycling programs.

Energy Conservation: Project Design Features

The Project would be designed to meet the standards for LEED® Silver Certification through the incorporation of green building techniques and other sustainability features. Key Project Design Features that would contribute to energy efficiencies include the use of glass/window areas for ventilation and daylight accessibility, and landscaping of roof decks. Other building features would include such items as stormwater retention; installation of HVAC systems that utilize ozone-friendly refrigerants; use of materials and finishes that emit low quantities of VOCs; use of high-efficiency fixtures and appliances, water conservation features; and recycling of solid wastes. The Project would also be designed to comply with the County of Los Angeles Green Building Standards and Low Impact Development (LID) requirements. The following Project Design Features set forth in Section 4.B, Air Quality, would reduce air pollutant emissions:

PDF-AQ-1: The Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and achieve the equivalent of USGBC LEED® Silver Certification. The Project would incorporate measures and performance standards which include but are not limited to the following:

- The Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous construction debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area.
- The Project would be designed to optimize energy performance and reduce building energy cost by 10 percent for new construction compared to ASHRAE 90.1-2010, Appendix G, and the Title 24 Building Standards Code.
- The Project would reduce indoor water use by a minimum of 35 percent by installing water fixtures that exceed applicable standards.

3. Operational Transportation Energy Consumption

As stated above, the Project would be located in an area served by public transportation. The location efficiency of the Project Site would result in synergistic benefits that would reduce vehicle trips compared to a so-called business-as-usual (BAU) project not well served by public transportation; this would reduce transportation-related energy demand. Other efficiencies include the proximity of the Project to complementary commercial uses. The Project would provide 96 bicycle parking spaces. Access to multiple destinations in close proximity to the Project Site (increased destination accessibility) would reduce vehicle trips, encourage walking and non-automotive forms of transportation, and result in corresponding reductions in transportation-related energy demand. These characteristics would improve transportation efficiency by reducing vehicle trips and miles traveled associated with the Project under both scenarios by approximately 25 percent compared to BAU conditions.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. In 2013, California consumed 341,194 thousand barrels of gasoline for transportation, which is

equivalent to a total annual consumption of 14.3 billion gallons by the transportation sector.²⁵ For diesel, California consumed 75,872 thousand barrels for transportation, which equivalent to a total annual consumption of 3.2 billion gallons by the transportation sector.²⁶ Project-related vehicles would require a fraction of a percent of the total State's transportation fuel consumption. A 2009 study by Caltrans determined that the Statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) would be 18.501 miles per gallon in 2015.²⁷

Based on the Project's estimated vehicle miles traveled of 20.7 million miles per year, and assuming the Project's mix of vehicle types (automobiles, trucks, and motorcycles) would have an average fuel economy of 18.501 miles per gallon, approximately 1.1 million gallons of fuel would be consumed in a year. Assuming 82 percent of the fuel is gasoline, this would represent about 0.0001 percent of the Statewide gasoline consumption and less than 0.0001 percent of the Statewide diesel consumption.

Alternative-Fueled Vehicles

Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors and employees, would reduce the Project's consumption of gasoline and diesel; however, the effect is anticipated to be minimal in the current vehicle market. According to the *Los Angeles Times*, alternative-fueled vehicles make up approximately 2.3 percent of all vehicles registered in California.²⁸ The above estimates do not account for alternative-fueled, electric, and hybrid vehicles, which are more energy-efficient vehicles. Thus, the assessment is a conservative estimate. If future Project workers and visitors utilize alternative-fueled vehicles, fuel savings could range between 0 and two percent. Based on the estimate above, this would translate to a fuel savings between 0 to 22,000 gallons of fuel per year.

Operational Transportation: Project Design Features

Implementation of the Project would include new vehicle trips. The specific requirements that would establish and regulate maximum occupancy are provided in PDF-TRAF-3 in Section 4.K, Transportation and Parking, and presented below.

PDF-TRAF-3: The Commercial Center's maximum permitted occupancy load for all restaurant uses will never exceed 1,561 occupants (including both customer and staff), and total restaurant floor area will not be less than 40,113 square feet nor more than 47,000 square feet. Restaurant occupancy loads will be determined by the County Division of Building and Safety in accordance with the California Building Code in effect at the time when restaurant floor plans are submitted for Director's Reviews, as required by the Department of Regional Planning. Restaurant occupancy restrictions will be controlled

²⁵ U.S. Energy Information Administration, Table F3: Motor Gasoline Consumption, Price, and Expenditure Estimates, 2013, http://www.eia.gov/state/seds/data.cfm?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=US. Accessed May 2015.

²⁶ U.S. Energy Information Administration, Table F7: Distillate Fuel Oil Consumption Estimates, 2013, http://www.eia.gov/state/seds/data.cfm?incfile=/state/seds/sep_fuel/html/fuel_use_df.html&sid=US. Accessed May 2015.

²⁷ California Department of Transportation, 2008 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, 2009.

²⁸ Los Angeles Times, "Electric, hybrid car sales up, California auto emissions down," May 22, 2014, <http://www.latimes.com/business/autos/la-fi-hy-electric-vehicle-sales-up-auto-emissions-down-20140521-story.html>. Accessed August 2014.

through the Commercial Center Association's CC&R. The Commercial Center Association (as maintained by the property manager) will:

- Keep records of each restaurant unit's maximum occupancy load;
- Track the Commercial Center's total occupancy load; and
- Have the authority to enforce each restaurant unit's maximum permitted occupancy load.

Prior to applying for a Director's Review, each restaurant unit owner will obtain written authorization from the Commercial Center Association that confirms the occupancy load sought for permit accords with that unit's maximum permitted occupancy in accordance with the CC&R. Restaurant owners will be prohibited from applying for a permit that seeks an occupancy load in excess of what is allowed, or building out a unit in excess of that unit's permitted maximum occupancy.

Once the Commercial Center Association has approved restaurant uses within the Commercial Center totaling of 1,561 occupants, no further restaurant uses may be approved by the Commercial Center Association. Occupant loads may be reallocated among restaurant unit owners with the prior approval of the Commercial Center Association (and such approvals from the County and Director's Review as are required by the County), but under no circumstances will the total occupant load for all restaurant uses in the Commercial Center exceed 1,561 occupant spaces.

E. GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the State *CEQA Guidelines* requires an EIR to discuss the ways a proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, pursuant to CEQA, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

The Project would result in redevelopment of a property used through the mid-1990s for agricultural cultivation. The property presently is undeveloped, except for a temporary detour road between Railroad Street and Gale Avenue, construction access and staging, and temporary surface parking constructed by ACE in conjunction with the nearby Nogales Street Grade Separation Project. The new development—which includes retail, restaurant, office, and hotel uses—represents infill development in an established urban environment. The Project Site is designated Major Industrial on the County General Plan Land Use Policy Map and Industrial on the Rowland Heights Community Plan Land Use Map. The zoning designation for the County portion of the Project Site is M-1.5-BE, (Restricted Heavy Manufacturing, Billboard Exclusion), which permits a broad range of industrial and commercial uses, including most commercial uses permitted in the C3 Unlimited Commercial zone. All of the Project's proposed land uses are permitted under this zoning designation, except hotels.²⁹ The Project would be consistent with land use regulations for the Project Site with approval of the requested Zone Change from M-1.5 to C-3-(DP) for Parcels 2 and 3 (to allow for the development of the proposed hotels), and with approval of the requested CUPs.

²⁹ *Los Angeles County Code, Title 22, Planning and Zoning Code, Chapter 22.32.100 et seq.*

The proposed Project uses would be compatible with surrounding land uses, including those immediately adjacent. Land uses to the north, within the City of Industry, are predominantly light industry and warehousing. The Site is bordered to the east, west, and south by commercial uses, including The Concourse Business Park, Rowland Heights Plaza Shopping Center, Best Western Executive Inn, and Mandarin Plaza Shopping Center. Land uses clustered near the intersection of Nogales Street and Gale Avenue consist largely of commercial uses. The Project Site is well served by utility infrastructure, with the only off-site infrastructure improvements required consisting of tie-ins to the utility main-lines already serving the Project area. The Project would result in the undergrounding of the last remaining aboveground, partially channelized segment of the storm drain network in the Project area; these improvements would tie into the County's storm drain system at the eastern property boundary and the City of Industry's system at the western boundary. The Project would not require the construction of off-site infrastructure that would provide additional infrastructure capacity for other future development.

The Project Site is already served by public services, including fire and law enforcement (County Sheriff). As commercial uses only are proposed and fewer than 1,000 employees are anticipated as the daytime on-site population, the Project would not increase residential population density in the Rowland Heights community nor generate new demand for schools, libraries, recreational facilities or services, or other public services.

In sum, the Project would not spur additional growth other than that already anticipated, nor would the Project eliminate existing impediments to growth. Thus, the Project would not foster growth-inducing impacts.

F. POTENTIAL SECONDARY EFFECTS

Section 15126.4(a)(1)(D) of the State *CEQA Guidelines* requires mitigation measures to be discussed in less detail than the significant effects of the proposed Project if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the Project as proposed. The analysis of Project impacts in Chapter 4.0 of this Draft EIR indicates that mitigation measures are required for the issues identified below. The following provides a discussion of the potential secondary effects on those topics that could occur as a result of implementation of the required Project mitigation measures. For the reasons stated below, Project mitigation measures would not result in significant secondary impacts.

1. Biological Resources

Mitigation Measure MM-BIO-1, which addresses potential Project impacts on jurisdictional resources, requires: 1) procurement of required permits from regulatory agencies prior to grading-related impacts on jurisdictional resources in the partially channelized storm drain on the Project Site; 2) implementation of on- or off-site mitigation for impacts to USACE/RWQCB jurisdictional "waters of the U.S./waters of the State"; and 3) on- or off-site restoration or enhancement of CDFW jurisdictional streambed and associated riparian habitat. Mitigation Measure MM-BIO-2, proposed for potential impacts on raptor or other bird nests protected under the Migratory Bird Treaty Act include conducting construction outside the avian breeding season or, if infeasible, conducting surveys during breeding season in suitable habitat within 500 feet (or less, of warranted) of construction. Mitigation also requires monitoring of construction activity to ensure protection of such buffers. These measures are intended to offset Project impacts on natural resources and would not themselves result in significant secondary impacts.

2. Cultural Resources

a. Archaeological Resources

Mitigation Measures MM-ARCHAEO-1 through MM-ARCHAEO-4 establish protections for archaeological resources through developing and implementing a monitoring program to identify any archaeological resources present on the Project Site and treatment of resources should they be encountered. The mitigation measures assure that these resources would be treated consistent with the State *CEQA Guidelines*, regulatory provisions for the protection of resources, and the State Health and Safety Code. These measures would not require new construction or cause any off-site impacts. Therefore, these mitigation measures would not have a significant secondary impact on the environment.

b. Paleontological Resources

Mitigation Measures MM-PALEO-1 through MM-PALEO-3 establish protections for paleontological resources through developing and implementing a monitoring program to identify and protect any paleontological resources present on the Project Site and to salvage and curate such resources should they be encountered. The mitigation measures assure that these resources would be treated consistent with State *CEQA Guidelines* and regulatory provisions for the protection of resources. These measures would not require new construction or cause any off-site impacts. Therefore, these mitigation measures would not have a significant secondary impact on the environment.

3. Noise

Mitigation Measure MM-NOISE-1 requires establishment of a temporary 12-foot noise barrier along the Gale Avenue Project Site frontage during construction to reduce construction noise impacts on the Best Western Plus Executive Inn hotel to the south across Gale Avenue. Construction of this barrier represents a minor site improvement and is part of the anticipated construction program addressed in the environmental analyses in Section 4.I, Noise, of this Draft EIR. No secondary impacts would result.

4. Transportation and Parking

Mitigation Measure MM-TRAF-1 requires the Project Applicant to make fair-share contributions to LACDPW Traffic and Lighting toward the cost of physical roadway improvements at five potentially significantly impacted intersections in the study area. These contributions have been calculated according to LACDPW Traffic and Lighting formulae, and would be confirmed and approved by LACDPW for implementation. These improvements are intended to increase capacity at significantly impacted intersections under the Future (2020) With Project Plus Cumulative Traffic conditions. No traffic-related mitigation is proposed that would require acquisition of additional right-of-way or otherwise result in secondary impacts.

The Project would also include Project Design Feature PDF-TRAF-3; this would become a condition of approval to limit the Commercial Center's total maximum permitted occupancy load for all restaurant uses to 1,561 persons; this assumes that the floor area for restaurant space (including customer and kitchen areas, per Table 4.K-9 in Section 4.K, Transportation and Parking) would be no less than 40,113 square feet. Should the restaurant floor area exceed 40,113 square feet, a corresponding reduction in retail floor area and parking demand associated with the Commercial Center as a whole would be required.

G. EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the State *CEQA Guidelines* states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. Pursuant to Section 1512, such a statement may be contained in an attached copy of an Initial Study. An Initial Study was prepared for the Project and is included in Appendix A-2 of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the Draft EIR.

The County of Los Angeles determined that the Project would not result in potentially significant impacts related to:

- Aesthetics (scenic vistas, views from regional riding or hiking trails, and scenic resources within a scenic highway corridor);
- Agriculture and Forest Resources;
- Air Quality (objectionable odors);
- Biological Resources (conflict with local policies or ordinances protecting biological resources, conflict with habitat conservation plans);
- Cultural Resources (historical resources);
- Energy (inefficient use of energy resources);
- Geology (landslides, soils capable of supporting on-site wastewater disposal, conflict with the Hillside Management Area Ordinance);
- Hazards and Hazardous Materials (all topics except adequate pressure to meet fire flow standards);
- Hydrology and Water Quality (depletion of groundwater supplies, creation of standing water and vector habitat, discharge into State-designated Areas of Special Biological Significance, use of on-site wastewater systems, placement of housing or structures or impedance or redirection of flows within a designated floodplain, floodway, or flood hazard area, exposure of people or property to flooding risk, inundation by seiche, tsunami, or mudflow);
- Land Use and Planning (physical division of an established community, conflict with Hillside Management criteria, Significant Ecological Areas conformance criteria, or other applicable land use criteria);
- Mineral Resources;
- Noise (airport land use plan, private airstrip);
- Population and Housing;
- Public Services (Schools, Parks, Libraries, or other public services);
- Recreation;
- Transportation/Circulation (change in air traffic patterns); and

- Utilities and Service Systems (exceedance of applicable Regional Water Quality Control Board criteria, energy utility capacity problems or construction of new facilities, landfill capacity, compliance with applicable solid waste disposal statutes).

For further discussion of these issues and more detailed evaluation of potential impacts, refer to the Project Initial Study provided in Appendix A-2 of this Draft EIR.

7. REFERENCES

7.0 REFERENCES

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**8. LIST OF EIR PREPARERS AND
ORGANIZATIONS AND PERSONS CONTACTED**

8.0 LIST OF EIR PREPARERS AND ORGANIZATIONS AND PERSONS CONTACTED

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9. ACRONYMS AND ABBREVIATIONS

9.0 ACRONYMS AND ABBREVIATIONS

Term	Description
AB	Assembly Bill
ACE	Alameda Corridor-East Construction Authority
AFY	acre-feet per year
Air Basin	South Coast Air Basin
AMSL	above mean sea level
AQMP	Air Quality Management Plan
AR4	Fourth Assessment Report of the Intergovernmental Panel on Climate Change
ASBS	Area of Special Biological Significance
ASCE	American Society of Civil Engineers
ASTM	American Society for Testing and Materials
ATCM	Airborne Toxic Control Measure
AWWA	American Water Works Association
BACT	Best Available Control Technology
Basin Plan	Water Quality Control Plan
BAU	business-as-usual
BDCP	Bay Delta Conservation Plan
BMPs	Best Management Practices
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
Cal/OSHA	California Division of Occupational Safety and Health Administration
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCR	California Code of Regulations
CC&R	Covenants, Conditions and Restrictions
CDFW	California Department of Fish and Wildlife
CDPH	California Department of Public Health
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CEUS	California Commercial End-Use Survey
CFC	California Fire Code (CCR, Title 24, Part 9)

Term	Description
CFR	Code of Federal Regulations
cfs	cubic feet per second
CGS	California Geological Survey
CH ₄	Methane
CHRIS	California Historical Resources Information System
CIMC	City of Industry Municipal Code
City	City of Industry
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	equivalent mass of carbon dioxide
Construction General Permit	General Permit for Storm Water Discharges Associated with Construction Activities, NPDES Permit No. CAS000002
County	Los Angeles County
County Flood Control	Los Angeles County Flood Control District
CPUC	California Public Utilities Commission
CRPRs	California Rare Plant Ranks
CSD	Rowland Heights Community Standards District
CUP	Conditional Use Permit
CWA	Federal Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted dB scale
DBH	diameter at breast height
DP	Development Program
DPM	diesel exhaust particulate matter
DPR	Department of Parks and Recreation
Draft EIR	Draft Environmental Impact Report
DWR	California Department of Water Resources
EIR	Environmental Impact Report
EMFAC	emission factors
EOC	Emergency Operations Center
ESA	Federal Endangered Species Act
FAR	floor:area ratio

Term	Description
FEMA	Federal Emergency Management Agency
FGC	California Fish and Game Code
FHWA	Federal Highway Administration
Fire Code	County of Los Angeles Fire Code (Los Angeles County Code, Title 32)
FIRM	flood insurance rate map
FIS	flood insurance studies
FTA	Federal Transit Administration
GCASP	General Activities Construction Permit
General Permit	SWRCB Order No. 2009-0009-DWQ
GHG	greenhouse gas
GIS	Geographic Information System
gpd	gallons per day
gpm	gallons per minute
GWP	global warming potential
HFC	hydrofluorocarbon
HI	hazard index
HRA	health risk assessment
HVAC	heating, ventilation, and air conditioning
ICU	Intersection Capacity Utilization
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resources Plan
ITE	Institute of Transportation Engineers
JOS	Joint Outfall System
JWPCP	joint water pollution control plant
kBtu	kilo British thermal units
kWh	kilowatt-hours
LA Basin Plan	Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties
LACC	Los Angeles County Code
LACCSMD	Los Angeles County Consolidated Sewer Maintenance District
LACDPW	Los Angeles County Department of Public Works
LACFD	Los Angeles County Fire Department
LACSD	Los Angeles Community Services District
LACSD	Los Angeles County Sanitation Districts
LAFCO	Los Angeles County Local Agency Formation Commission
LARWQCB	Los Angeles Regional Water Quality Control Board
LASD	Los Angeles County Sheriff's Department
LCFS	Low Carbon Fuel Standard
LEED®	Leadership in Energy and Environmental Design
L_{eq}	Equivalent Sound Level

Term	Description
LID	Low Impact Development
L_{max}	Maximum Noise Level
LOS	Level of Service
LST	Localized Significance Threshold
MATES IV	Multiple Air Toxics Exposure Study
MBTA	Migratory Bird Treaty Act
Metro	Los Angeles County Metropolitan Transportation Authority
mgd	million gallons per day
MHHW	mean higher high water
MICR	maximum individual cancer risk
MLD	Most Likely Descendent
MMT	million metric tons
MMTCO _{2e}	million metric tons equivalent mass of carbon dioxide
mpg	miles per gallon
MS4	Municipal Separate Storm Sewer Systems
MT	metric tons
MW	megawatts
MWD	Metropolitan Water District
MWh	Megawatt-hour
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NFIP	National Flood Insurance Program
NHMLAC	Natural History Museum of Los Angeles County
NMFS	National Marine Fisheries Service
NO	nitric oxide
NO ₂	nitrogen dioxide
NOA	Notice of Availability
NOC	Notice of Completion
NOI	Notice of Intent
NOP	Notice of Preparation
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
O ₃	ozone
OAERP	Operational Area Emergency Response Plan
OEHHA	California Environmental Protection Agency Office of Environmental Health Hazard Assessment
OEM	Office of Emergency Management
OPR	State of California, Governor's Office of Planning and Research
OWCMP	Los Angeles County Oak Woodlands Conservation Management Plan

Term	Description
Pb	Lead
PDT	Pacific Daylight Time
PFC	Perfluorocarbon
PGA _M	peak ground acceleration
PM ₁₀	respirable particulate matter
PM _{2.5}	fine particulate matter
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
psi	pounds per square inch
PST	Pacific Standard Time
PUC	Public Utilities Commission
Q50	50-Year Storm Flow
RCNM	roadway construction noise model
RCP	Regional Comprehensive Plan
RCP	reinforced concrete pipe
RD	Reporting District
RMCL	recommended maximum contamination level
RPS	Renewables Portfolio Standard
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RUWMP	Metropolitan Water District's Regional Urban Water Management Plan
RWD	Rowland Water District
RWQCB	Regional Water Quality Control Board
Safety Element	Los Angeles County General Plan Safety Element
SAR	Second Assessment Report of the Intergovernmental Panel on Climate Change
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCRRA	Southern California Regional Rail Authority
SCS	Sustainable Communities Strategy
SDWA	Safe Drinking Water Act
SEA	Significant Ecological Area
SERAs	Sensitive Environmental Resource Areas
SF ₆	sulfur hexafluoride
sf	square feet

Term	Description
SFHA	Special Flood Hazard Area
SLF	Sacred Lands File
SO ₂	sulfur dioxide
SO ₄	sulfates
STIP	Statewide Transportation Improvement Program
Strategic Plan	Los Angeles County Fire Department Strategic Plan, Engineering Our Future
SUSMP	Standard Urban Stormwater Mitigation Plan
SVP	The Society of Vertebrate Paleontology
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWQDv	Stormwater Quality Design Volume
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
T _c	Time of Concentration
TDS	total dissolved solids
TeNS	Caltrans Technical Noise Supplement
TMDL	Total Maximum Daily Load
µg/m ³	micrograms per cubic meter
ULI	Urban Land Institute
UPRR	Union Pacific Railroad
USACE	United States Army Corps of Engineers
USCS	Unified Soil Classification System
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
V/C	volume-to-capacity
VCP	vitriified clay pipe
VMT	vehicle miles traveled
VOCs	volatile organic compounds
vpd	vehicles per day
WRP	water reclamation plant
WSA	water supply assessment
WTP	Weymouth treatment plant
WWECP	Wet Weather Erosion Control Plans



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