

**FINAL**  
**MITIGATED NEGATIVE DECLARATION AND**  
**INITIAL STUDY**

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**BANNISTER AVENUE PLANNED**  
**DEVELOPMENT**

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**4422 & 4436 BANNISTER AVENUE.**  
**EL MONTE, CALIFORNIA**



**LEAD AGENCY:**

**CITY OF EL MONTE**  
**ECONOMIC DEVELOPMENT DEPARTMENT, PLANNING DIVISION**  
**11333 VALLEY BOULEVARD**  
**EL MONTE, CALIFORNIA 91731**

**NOVEMBER 10, 2014**  
**FINAL PREPARED DECEMBER 21, 2014**

ELMT 003

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## MITIGATED NEGATIVE DECLARATION

This Mitigated Negative Declaration has been circulated for public review and comment. Minor revisions and changes to the IS/MND were made to reflect the input received. These changes are identified using the following conventions: additional or new material is noted using underlining while text that has been deleted is noted using ~~striketrough~~-text.

**NAME:** Bannister Avenue Planned Residential Development.

**ADDRESS:** 4422 Bannister Avenue and 4436 Bannister Avenue. El Monte, California 91790.

**CITY/COUNTY:** City of El Monte, Los Angeles County.

**APPLICANT:** The Applicant for the proposed project is W C Homes. 1773 San Bernardino Road, Suite B 42. West Covina, California 91790.

**PROJECT:** The City of El Monte Economic Development Department, in its capacity as the Lead Agency is reviewing an application for a residential planned development. The proposed project consists of a 23 dwelling unit single-family detached residential development located to the west of the San Gabriel River in the eastern portion of the City of El Monte. The largely undeveloped 137,563 square foot (3.16-acre site) project site is largely vacant though some agricultural uses and three vacant residences are located within the property. The project site is bounded by single-family homes to the north and south; the San Gabriel River Trail and River to the east; and single-family homes on Bannister Avenue to the west. Discretionary approvals that would be required as part of the proposed project's implementation include the following:

- The approval of a General Plan Amendment (No. 02-14);
- The approval of a Zone Change (No. 02-14);
- The approval of a Vesting Tentative Tract Map (No. 72192);
- The approval of a Conditional Use Permit (CUP No. 10-14) to allow for the construction of three or more units for sale;
- The approval of a Conditional Use Permit (CUP No. 11-14) to allow the property to be zoned as Planned Residential Development (PRD);
- The approval of a lot line adjustment;
- The approval of a Density Bonus with Concessions and Waivers; and,

- The approval of the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program.

Other permits will also be required including permits for building demolition and construction, grading, utility connections, and building occupancy.

**FINDINGS:**

The environmental analysis provided in the attached Initial Study indicates that the proposed project would not result in any significant adverse unmitigable impacts. For this reason, the City of El Monte has determined that a *Mitigated Negative Declaration* is the appropriate CEQA environmental determination for the proposed project. The following findings may be made based on the analysis contained in the attached Initial Study:

- The construction and subsequent occupancy of the proposed project *will not* have the potential to degrade the quality of the environment.
- The construction and subsequent occupancy of the proposed project *will not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.
- The construction and subsequent occupancy of the proposed project *will not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the City.
- The construction and subsequent occupancy of the proposed project *will not* have environmental effects that will adversely affect humans, either directly or indirectly.

The environmental analysis is provided in the attached Initial Study prepared for the proposed project. The project is also described in greater detail in the attached Initial Study.

The Mitigated Negative Declaration was circulated for 30 days between November 12, 2014 through December 11, 2014. A community meeting was held on December 3, 2014 to further inform the community as to the nature of the proposed project and to obtain comments. In addition, written comments were also provided to the City during the review period. The comments, and the Lead Agency's responses, are provided herein in Section 6.

Signature \_\_\_\_\_

Date: \_\_\_\_\_

City of El Monte Economic Development Department



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## SECTION 1 - INTRODUCTION

### 1.1 PURPOSE OF THE INITIAL STUDY

The City of El Monte, in its capacity as the Lead Agency, is considering a proposal to construct a 23 unit single-family detached residential development on a property located adjacent to, and west of, the San Gabriel River. The proposed project site consists of 3.16 acres. The project site is bounded by single-family homes to the north and south; the San Gabriel River Trail and River to the east; and, single-family homes on Bannister Avenue to the west. The three vacant single family residences will need to be demolished in order to accommodate the proposed development. The three single family units have been vacant for over a year. In addition, the proposed project would involve the demolition of vacant shacks, livestock shelters, miscellaneous equipment, and fencing. The floor area of the six existing sheds and shacks totals 6,875 square feet. The livestock shelters construction consists of wood, particle board, and metal roofs attached to a wooden frame. Two of the larger livestock shelters also feature an opening secured by a smaller rail fence, these two shelters were designed like this in order to feed and move the animals. The smallest shack is comprised of metal sheets for all sides including the roof. The remaining on-site improvements are comprised of wooden walls and metal roofs. The legal addresses of the parcels that are included within the project site boundaries are 4422 and 4436 Bannister Avenue. The Applicant is W C Homes, 1773 San Bernardino Road, Suite B42, West Covina, California 91790.

The City of El Monte is the designated Lead Agency that is responsible for the environmental review of the entire project pursuant to the California Environmental Quality Act (CEQA).<sup>1</sup> Pursuant to the CEQA Guidelines, additional purposes of this Initial Study include the following:

- To provide the City of El Monte with information to use as the basis for deciding whether to prepare an environmental impact report (EIR), a mitigated negative declaration, or a negative declaration for the project;
- To facilitate the proposed project's environmental assessment early in the planning phases;
- To eliminate unnecessary EIRs; and,
- To determine the nature and extent of any new impacts associated with the proposed project.

### 1.2 INITIAL STUDY'S ORGANIZATION

The following annotated outline summarizes the format and content of this Initial Study:

- *Section 1 - Introduction*, provides the procedural context surrounding this Initial Study's preparation and insight into its composition.

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<sup>1</sup> California, State of, *Title 14. California Code of Regulations. Chapter 3. Guidelines for the Implementation of the California Environmental Quality Act as Amended 2000.* (CEQA Guidelines) § 15050.

- *Section 2 - Project Description*, provides an overview of the affected area along with a description of the proposed project.
- *Section 3 - Environmental Analysis*, includes an analysis of potential impacts associated with the implementation of the proposed project.
- *Section 4 - Conclusions*, identifies the Mandatory Findings of Significance related to the proposed project's approval and subsequent implementation.
- *Section 5 - References*, identifies the sources used in the preparation of this Initial Study.
- *Section 6 – Comments and Responses to Comments*, identifies those agencies and individuals that commented on the IS/MND and the Lead Agency's responses.

### **1.3 INITIAL STUDY CHECKLIST**

The environmental analysis provided in Section 3 of this Initial Study indicates that the implementation of the proposed project would not result in any significant adverse unmitigable impacts on the environment. For this reason, the City of El Monte has determined that a Mitigated Negative Declaration is the appropriate CEQA environmental determination for the proposed project's environmental review. The following findings may be made based on the analysis completed as part of this Initial Study's preparation:

- The proposed project *would not* have the potential to degrade the quality of the environment.
- The proposed project *would not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.
- The proposed project *would not* have impacts that are individually limited, but cumulatively considerable.
- The proposed project *would not* have environmental effects that would adversely affect humans, either directly or indirectly.

The findings of this Initial Study are summarized in Table 1-1 provided below and on the following pages.

**Table 1-1  
 Summary (Initial Study Checklist)**

<b>Environmental Issues Area Examined</b>	<b>Significant Unavoidable Impact</b>	<b>Less Than Significant Impact With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>Section 3.1 Aesthetic Impacts.</b> <i>Would the project:</i>				
<b>a)</b> Have a substantial adverse affect on a scenic vista?			<b>X</b>	
<b>b)</b> Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				<b>X</b>
<b>c)</b> Would the project substantially degrade the existing visual character or quality of the site and its surroundings?				<b>X</b>
<b>d)</b> Create a new source of substantial light or glare that would adversely affect day- or night-time views in the area?		<b>X</b>		
<b>Section 3.2 Agriculture and Forestry Resources Impacts.</b> <i>Would the project:</i>				
<b>a)</b> Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				<b>X</b>
<b>b)</b> Conflict with existing zoning for agricultural use, or a Williamson Act Contract?				<b>X</b>
<b>c)</b> Would the project conflict with existing zoning for or cause rezoning of, forest land (as defined in Public Resources Code §4526), or zoned timberland production (as defined by Government Code §51104[g])?				<b>X</b>
<b>d)</b> Would the project result in the loss of forest land or the conversion of forest land to a non-forest use?				<b>X</b>
<b>e)</b> Involve other changes in the existing environment that, due to their location or nature, may result in conversion of farmland to non-agricultural use?				<b>X</b>
<b>Section 3.3 Air Quality Impacts.</b> <i>Would the project:</i>				
<b>a)</b> Conflict with or obstruct the implementation of the applicable air quality plan?				<b>X</b>
<b>b)</b> Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		<b>X</b>		
<b>c)</b> 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)?			<b>X</b>	
<b>d)</b> Expose sensitive receptors to substantial pollutant concentrations?			<b>X</b>	

**Table 1-1  
 Summary (Initial Study Checklist)**

<b>Environmental Issues Area Examined</b>	<b>Significant Unavoidable Impact</b>	<b>Less Than Significant Impact With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
e) Create objectionable odors affecting a substantial number of people?		<b>X</b>		
<b>Section 3.4 Biological Resources Impacts.</b> <i>Would the project have a substantial adverse effect:</i>				
a) Either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?				<b>X</b>
b) On any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				<b>X</b>
c) On Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				<b>X</b>
d) In interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?				<b>X</b>
e) In conflicting with any local policies or ordinances, protecting biological resources, such as a tree preservation policy or ordinance?			<b>X</b>	
f) By conflicting with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?				<b>X</b>
<b>Section 3.5 Cultural Resources Impacts.</b> <i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 of the CEQA Guidelines?				<b>X</b>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?		<b>X</b>		
c) Directly or indirectly destroy a unique paleontological resource site, or unique geologic feature?		<b>X</b>		
d) Disturb any human remains, including those interred outside of formal cemeteries?			<b>X</b>	

**Table 1-1  
 Summary (Initial Study Checklist)**

Environmental Issues Area Examined	Significant Unavoidable Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
<b>Section 3.6 Geology Impacts.</b> <i>Would the project result in or expose people to potential impacts involving:</i>				
<p><b>a)</b> The exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault (as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault), ground-shaking, liquefaction, or landslides?</p>		<b>X</b>		
<p><b>b)</b> Substantial soil erosion or the loss of topsoil?</p>			<b>X</b>	
<p><b>c)</b> Location on a geologic unit or a 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?</p>			<b>X</b>	
<p><b>d)</b> Location on expansive soil, as defined in California Building Code (2012), creating substantial risks to life or property?</p>				<b>X</b>
<p><b>e)</b> Soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?</p>				<b>X</b>
<b>Section 3.7 Greenhouse Gas Emissions Impacts.</b> <i>Would the project:</i>				
<p><b>a)</b> Result in the generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</p>			<b>X</b>	
<p><b>b)</b> Increase the potential for conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gasses?</p>			<b>X</b>	
<b>Section 3.8 Hazards and Hazardous Materials Impacts.</b> <i>Would the project:</i>				
<p><b>a)</b> Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</p>		<b>X</b>		
<p><b>b)</b> Create a significant hazard to the public or the environment or result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</p>			<b>X</b>	
<p><b>c)</b> Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</p>		<b>X</b>		
<p><b>d)</b> Be located on a site, which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, and as a result, would it create a significant hazard to the public or the environment?</p>				<b>X</b>

**Table 1-1  
 Summary (Initial Study Checklist)**

<b>Environmental Issues Area Examined</b>	<b>Significant Unavoidable Impact</b>	<b>Less Than Significant Impact With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>e)</b> Be located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?				<b>X</b>
<b>f)</b> Within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area?				<b>X</b>
<b>g)</b> Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency response plan or emergency evacuation plan?				<b>X</b>
<b>h)</b> Expose people or structures to a significant risk of loss, injury, or death involving wild lands fire, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands?				<b>X</b>
<b>Section 3.9 Hydrology and Water Quality Impacts.</b> <i>Would the project:</i>				
<b>a)</b> Violate any water quality standards or waste discharge requirements?		<b>X</b>		
<b>b)</b> Substantially deplete groundwater supplies or interfere substantially with groundwater recharge in such a way that would cause 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)?				<b>X</b>
<b>c)</b> Substantially alter the existing drainage pattern of the site or area, including 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?				<b>X</b>
<b>d)</b> Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in flooding on- or off-site?				<b>X</b>
<b>e)</b> Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?		<b>X</b>		
<b>f)</b> Substantially degrade water quality?				<b>X</b>
<b>g)</b> 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?			<b>X</b>	
<b>h)</b> Place within a 100-year flood hazard area, structures that would impede or redirect flood flows?			<b>X</b>	
<b>i)</b> Expose people or structures to a significant risk of flooding because of dam or levee failure?			<b>X</b>	

**Table 1-1  
 Summary (Initial Study Checklist)**

<b>Environmental Issues Area Examined</b>	<b>Significant Unavoidable Impact</b>	<b>Less Than Significant Impact With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>j) Result in inundation by seiche, tsunami, or mudflow?</b>				<b>X</b>
<b>Section 3.10 Land Use and Planning Impacts.</b> <i>Would the project:</i>				
<b>a) Physically divide an established community, or otherwise result in an incompatible land use?</b>			<b>X</b>	
<b>b) Conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, proposed project, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</b>			<b>X</b>	
<b>c) Conflict with any applicable habitat conservation or natural community conservation plan?</b>				<b>X</b>
<b>Section 3.11 Mineral Resources Impacts.</b> <i>Would the project:</i>				
<b>a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?</b>				<b>X</b>
<b>b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, proposed project, or other land use plan?</b>				<b>X</b>
<b>Section 3.12 Noise Impacts.</b> <i>Would the project result in:</i>				
<b>a) Exposure of persons to, or the generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</b>		<b>X</b>		
<b>b) Exposure of people to, or the generation of, excessive ground-borne noise levels?</b>			<b>X</b>	
<b>c) Substantial permanent increase in ambient noise levels in the project vicinity above noise levels existing without the project?</b>			<b>X</b>	
<b>d) Substantial temporary or periodic increases in ambient noise levels in the project vicinity above levels existing without the project?</b>		<b>X</b>		
<b>e) For a project located with 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?</b>				<b>X</b>
<b>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?</b>				<b>X</b>

**Table 1-1  
 Summary (Initial Study Checklist)**

<b>Environmental Issues Area Examined</b>	<b>Significant Unavoidable Impact</b>	<b>Less Than Significant Impact With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>Section 3.13 Population and Housing Impacts.</b> <i>Would the project:</i>				
<b>a)</b> Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?			<b>X</b>	
<b>b)</b> Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				<b>X</b>
<b>c)</b> Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				<b>X</b>
<b>Section 3.14 Public Services Impacts.</b> <i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in any of the following areas:</i>				
<b>a)</b> Fire protection services?		<b>X</b>		
<b>b)</b> Police protection services?		<b>X</b>		
<b>c)</b> School services?			<b>X</b>	
<b>d)</b> Other governmental services?			<b>X</b>	
<b>Section 3.15 Recreation Impacts.</b> <i>Would the project:</i>				
<b>a)</b> Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				<b>X</b>
<b>b)</b> Affect existing recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				<b>X</b>
<b>Section 3.16 Transportation Impacts.</b> <i>Would the project:</i>				
<b>a)</b> Cause 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>X</b>

**Table 1-1  
 Summary (Initial Study Checklist)**

<b>Environmental Issues Area Examined</b>	<b>Significant Unavoidable Impact</b>	<b>Less Than Significant Impact With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>b)</b> Exceed, either individually or cumulatively, a level of service standard established by the County Congestion Management Agency for designated roads or highways?				<b>X</b>
<b>c)</b> A change in air traffic patterns, including either an increase in traffic levels or a change in the location that results in substantial safety risks?				<b>X</b>
<b>d)</b> Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				<b>X</b>
<b>e)</b> Result in inadequate emergency access?			<b>X</b>	
<b>f)</b> Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				<b>X</b>
<b>Section 3.17 Utilities Impacts.</b> <i>Would the project:</i>				
<b>a)</b> Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			<b>X</b>	
<b>b)</b> Require 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 impacts?			<b>X</b>	
<b>c)</b> Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				<b>X</b>
<b>d)</b> Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			<b>X</b>	
<b>e)</b> Result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				<b>X</b>
<b>f)</b> Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?				<b>X</b>
<b>g)</b> Comply with Federal, State, and local statutes and regulations related to solid waste?				<b>X</b>
<b>h)</b> Result in a need for new systems, or substantial alterations in power or natural gas facilities?				<b>X</b>

**Table 1-1  
 Summary (Initial Study Checklist)**

Environmental Issues Area Examined	Significant Unavoidable Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
i) Result in a need for new systems, or substantial alterations in communication systems?				<b>X</b>
<b>Section 3.18 Mandatory Findings of Significance.</b> <i>The approval and subsequent implementation of the proposed project:</i>				
a) Will not have the potential to degrade the quality of the environment, with the implementation of the recommended standard conditions and mitigation measures included herein.				<b>X</b>
b) Will not have the potential to achieve short-term goals to the disadvantage of long-term environmental goals, with the implementation of the recommended standard conditions and mitigation measures referenced herein.				<b>X</b>
c) Will not have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity, with the implementation of the recommended standard conditions and mitigation measures contained herein.				<b>X</b>
d) Will not have environmental effects that will adversely affect humans, either directly or indirectly, with the implementation of the recommended standard conditions and mitigation measures contained herein.				<b>X</b>
e) This Initial Study indicated there is no evidence that the proposed project will have an adverse effect on wildlife resources or the habitat upon which any wildlife depends.				<b>X</b>



## SECTION 2 - PROJECT DESCRIPTION

### 2.1 PROJECT OVERVIEW

The City of El Monte Economic Development Department, in its capacity as the Lead Agency is reviewing an application for a residential planned development. The proposed project would consist of 23 single-family detached residential units. The proposed project site is located west of the San Gabriel River in the eastern-most portion of the City of El Monte. The proposed project site's total land area is 137,563 square feet site (approximately 3.16 acres). The project site is bounded by single-family homes to the north and south; the San Gabriel River Trail and River to the east; and single-family homes on Bannister Avenue to the west. Access to 18 of the residential units would be provided by a new private street/cul-de-sac with curb cuts located along the east side of Bannister Avenue. Access to the remaining five units fronting directly onto Bannister Avenue will be provided by driveways connecting to the east side of Bannister Avenue. The internal roadway, which would be located on the easternmost part of the property, would have a curb-to-curb width of 26 feet. No parking will be permitted on the private access road. Overall, a total of 24,326 square feet would be dedicated to private street/open space.<sup>2</sup>

### 2.2 PROJECT LOCATION

The proposed project site is located in the City of El Monte. The City of El Monte is located in the west San Gabriel Valley approximately 13.0 miles east of downtown Los Angeles. Major physiographic features in the area include the Rio Hondo River (located west of the City) and the San Gabriel River (located east of the City). The Puente Hills are located to the south approximately 3.0 miles and the Montebello Hills are located to the southwest approximately 2.6 miles. The Whittier Narrows, a gap between the Montebello Hills and the Puente Hills that was created by the San Gabriel River, is located approximately 2.8 miles to the southwest.<sup>3</sup> The San Gabriel Mountains are located approximately 7 miles to the north of the project site. The City of El Monte is bounded on the north by Arcadia and Temple City; on the west by Rosemead; on the east by Irwindale, Baldwin Park, Industry, and unincorporated areas; and on the south by South El Monte.<sup>4</sup> The City's location in a regional context is illustrated in Exhibit 2-1. The City's location in relation to the surrounding communities is illustrated in Exhibit 2-2.

The legal addresses of the parcels that would be affected include 4422 and 4436 Bannister Avenue. The Los Angeles County Tax Assessor's Parcels Numbers (APNs) that are applicable to the parcels that comprise the project sites include 8545-025-900, 901, and 017.<sup>5</sup> Primary access to the project site is provided by Bannister Avenue which extends along the project site's westerly side. Other major arterial roadways in the vicinity include Lower Azusa Road, located approximately 3,255 feet to the north of the project site, Maxson Road, located approximately 1,114 feet to the west of the project site, Lambert Avenue, located approximately 563 feet to the southwest of the project site, and Ramona Boulevard, located approximately 537 feet farther south.

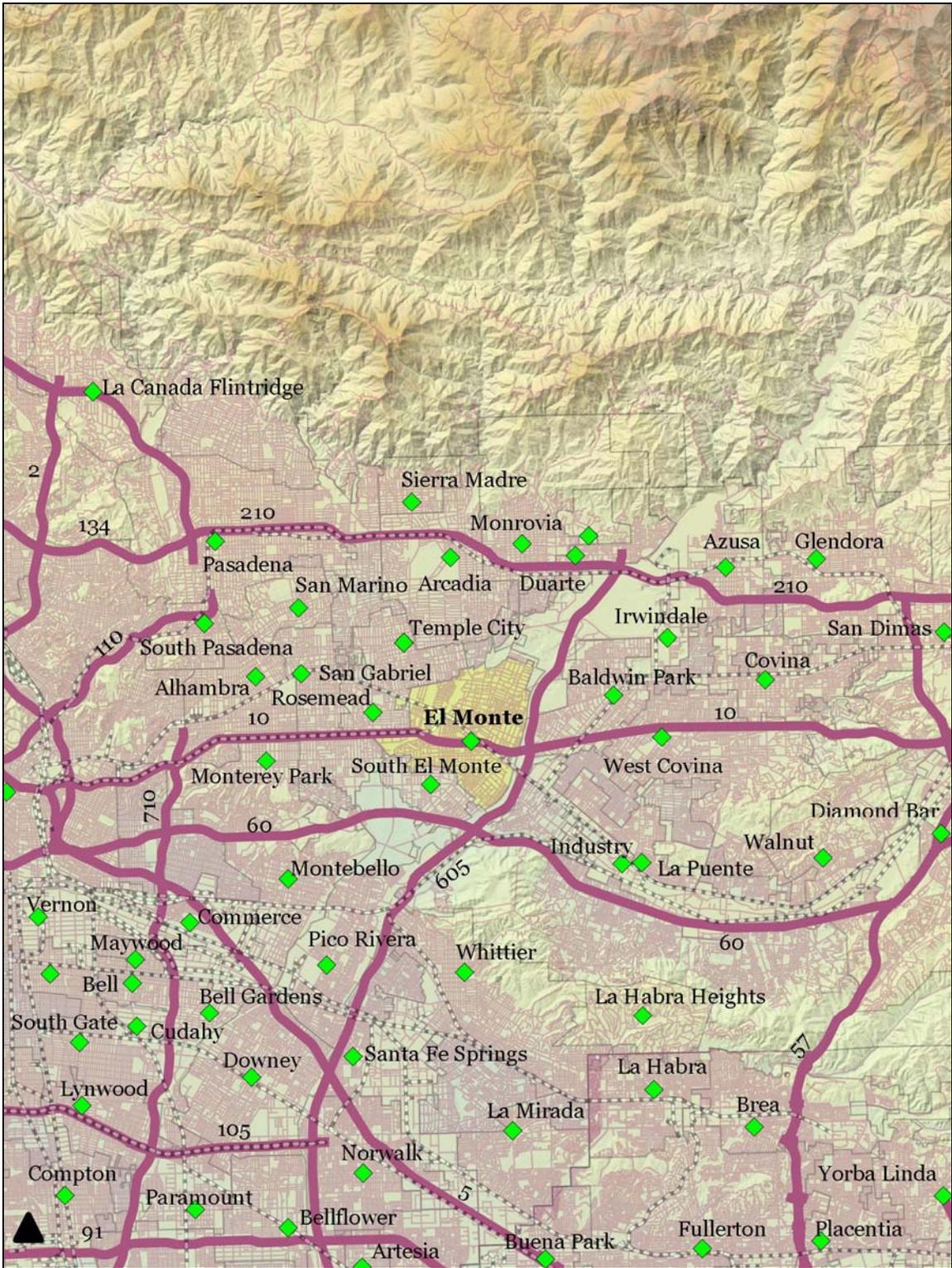
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<sup>2</sup> Conceptual Site Plan. *Land Development Consultants*. Accessed August 15<sup>th</sup>, 2014.

<sup>3</sup> United States Geological Survey. TerraServer USA. *The National Map – El Monte, California*. July 1, 1979.

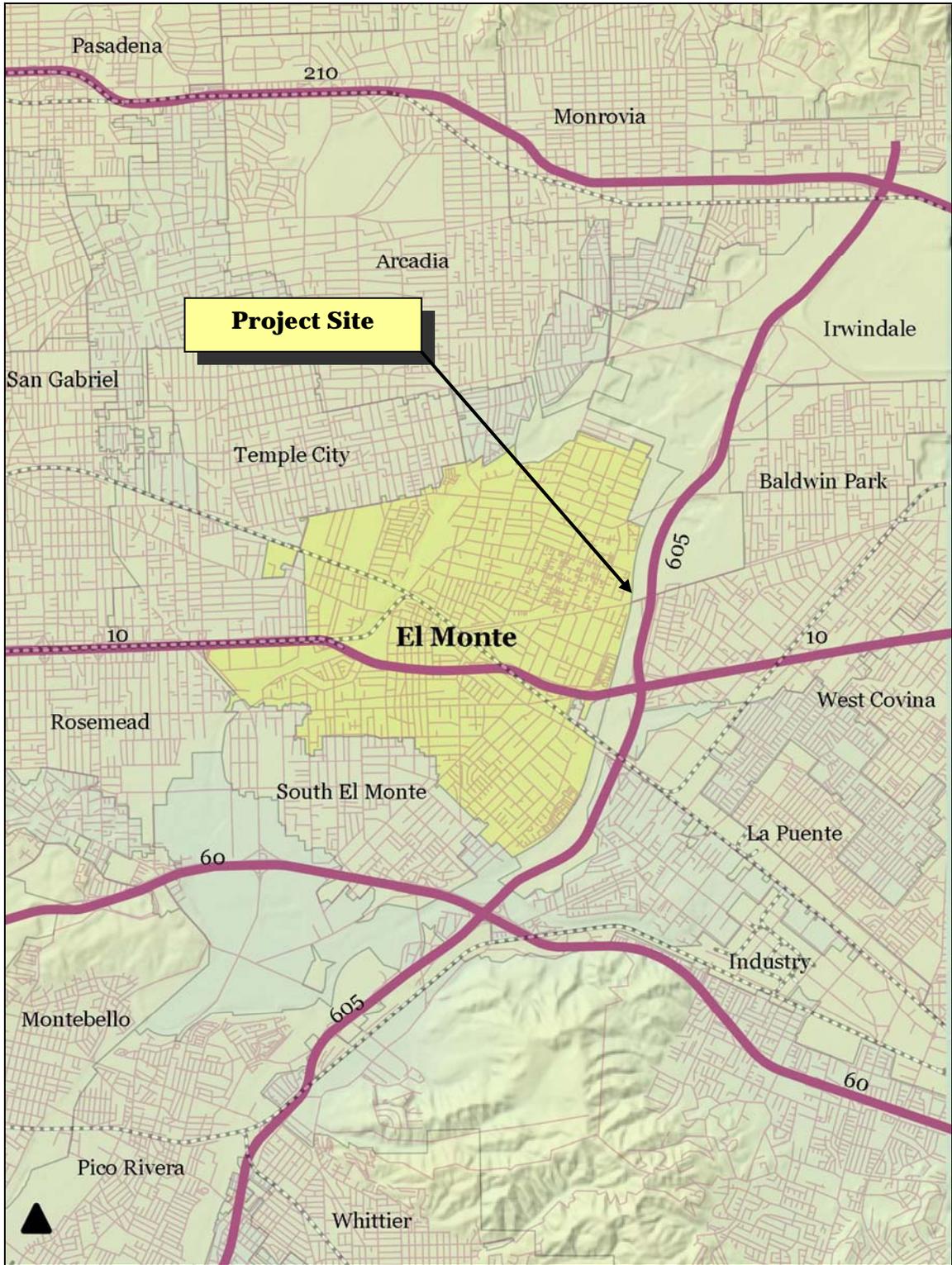
<sup>4</sup> Ibid.

<sup>5</sup> Los Angeles County Tax Assessor. Parcel Viewer. <http://maps.assessor.lacounty.gov/mapping/viewer.asp>



**EXHIBIT 2-1**  
**REGIONAL LOCATION MAP**

Source: Quantum GIS



**EXHIBIT 2-2**  
**VICINITY MAP**  
Source: Quantum GIS



**EXHIBIT 2-3**  
**LOCAL MAP**  
Source: Quantum GIS



**EXHIBIT 2-4**  
**PROJECT SITE MAP**

Source: Quantum GIS

Regional freeway access is provided by Interstate 10 (I-10), located approximately 1.08 miles to the south, Interstate 605 (I-605) located approximately 1,254 feet to the east, and Interstate 210 (I-210), located approximately 3.94 miles to the north. A local map is provided in Exhibit 2-3 and a project site map is provided in Exhibit 2-4.

## 2.3 ENVIRONMENTAL SETTING

The project site is located in an urban setting and is surrounded by urban development. The project site is currently zoned as *R-1B (Residential)* and *PF (Public Facility)* and is one of the few underdeveloped parcels in the City suitable for infill development. Surrounding land uses and development in the vicinity of the project site include the following:

- Star Street extends 572 feet to the north of the project site in an east-west orientation.<sup>6</sup> The entire north side of Star Street is occupied by Durfee School, which is part of the El Monte School District. The southern side of Star Street is occupied by residential development. The residential units vary from newer development to older homes.<sup>7</sup>
- The San Gabriel River and San Gabriel River Trail extends along the project site's east side in a north-south orientation.<sup>8</sup> The San Gabriel River is channelized and is used for flood control.<sup>9</sup> The San Gabriel River trail abuts the River to the west. The trail is paved and is atop a slope which consists of dirt, rocks, and loose gravel.<sup>10</sup>
- Bannister Avenue abuts the project site to the west in north-south orientation.<sup>11</sup> The street is currently in poor condition and no curbs or gutters are located along the right-of-way. In addition, the road is currently divided into a north segment and a south segment by a roadblock consisting of a downhill grade and medium sized concrete pillars in the middle portion of Bannister Avenue.<sup>12</sup> The segment of Bannister Avenue located to the north of the project site is not a public street. The street is surrounded on all sides by single family housing. The south end of the street curves to the west and becomes Lambert Avenue, a street that traverses the City in an east-west orientation.
- Ramona Boulevard extends 537 feet to the south of the project site in an east-west orientation.<sup>13</sup> Fernando R Ledesma High School occupies frontage along the north side of Ramona Boulevard. The High School also directly abuts the project site to the south. La Primaria Elementary School is located directly across Fernando R Ledesma High School on the south side of Ramona Boulevard.

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<sup>6</sup> Google Earth.

<sup>7</sup> Site Survey completed on August 15<sup>th</sup>, 2014.

<sup>8</sup> Google Earth.

<sup>9</sup> Site Survey completed on August 15<sup>th</sup>, 2014.

<sup>10</sup> Ibid.

<sup>11</sup> Google Earth.

<sup>12</sup> Site Survey completed on August 15<sup>th</sup>, 2014.

<sup>13</sup> Google Earth.

Residential development is located along the north side of Ramona Boulevard directly to the west of the High School. The south side of Ramona Boulevard to the west of the Elementary School features a mix of both residential development and commercial uses including a carwash, 7-Eleven, Taco N Trento, Bagworld, and El Dorado Tires.<sup>14</sup> In addition, there is a preschool (Burdick's) located on the corner of Ramona Boulevard and Maxson Road, and 2 bus stops (Ramona/Gilman and Ramona/Maxson) in the vicinity of the project site.<sup>15</sup>

- Other notable uses in the area is Peck Road Water Conservation Park, located in both Arcadia and El Monte approximately 1.5 miles to the northwest of the proposed project.

The north part of the project site is vacant and is situated on a downhill slope. The property is fenced off and is currently covered in dirt. No pavement, foundations, or signs of previous development remain on the northern portion of the project site. The northernmost portion of the project site is occupied by three residences that have been vacant for more than one year. The total floor area of these existing homes is 5,568 square feet. The southern portion of the project site is currently occupied by dilapidated sheds, buildings, fencing, miscellaneous equipment, and livestock shelters. This area is currently in use. Exhibit 2-5 is an aerial of the project site and the surrounding area. Photographs of the project site and the immediate area are included in Exhibits 2-6 and 2-7. A map of the existing site is provided in Exhibit 2-8.

## **2.4 PROJECT DESCRIPTION**

The proposed project will involve the demolition of the existing on-site improvements and the construction of 23 single-family units (the Applicant is seeking a density bonus that would permit the construction of two additional units). Baldwin Park Homes LLC is the current owner for 4436 Bannister Avenue. El Monte Union High School District is the owner of the remaining properties located within the project site.<sup>16</sup> The proposed project would consist of the following elements described below and in the remainder of the section:

- The existing on-site improvements will be demolished. The floor areas of the three vacant homes located in the northernmost portion of the site total 5,568 square feet. The floor area of the six existing structures in the southern portion of the site total 6,875 square feet. The demolition debris will be transported to the nearest facility that handles C&D (construction and demolition) materials. The existing sheds, debris, fencing, livestock shelters, plants, trees, and any other materials would be removed to accommodate the project. The demolition debris of the existing six structures will total approximately 187 cubic yards of C&D materials. Assuming 20 cubic yards per truck using tandem trailers, a total of nine truck trips will be required.
- A total of 23 new single family units would be constructed. A total of 5 different floor plans would be provided with the square footage of the individual units ranging from 1,693 square feet to 2,427 square feet.

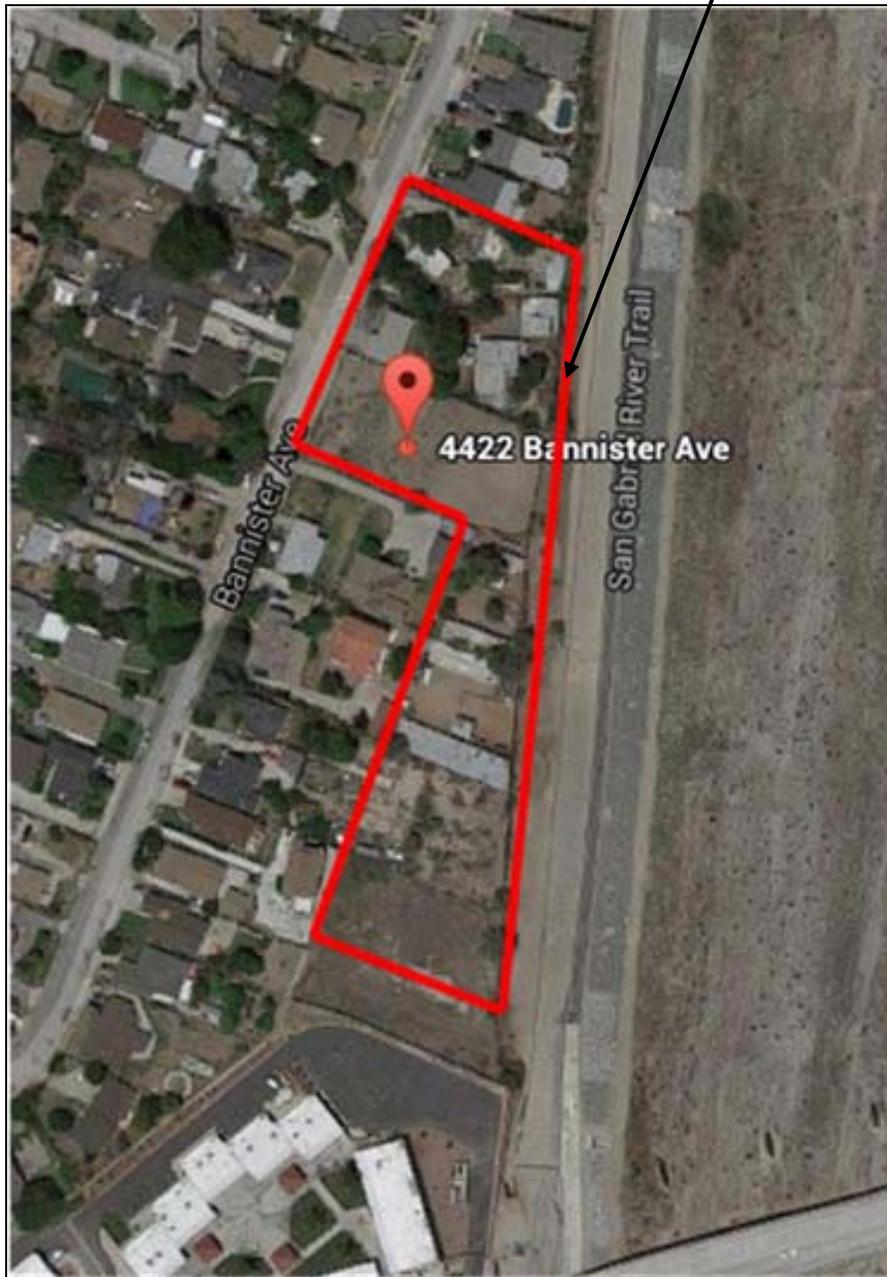
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<sup>14</sup> Site Survey completed on August 15<sup>th</sup>, 2014.

<sup>15</sup> Ibid.

<sup>16</sup> City of El Monte Vesting Tentative Tract Map No. 72192. Prepared by Land Development Consultants. June 2<sup>nd</sup>, 2014.

**Project Site**



**EXHIBIT 2-5**  
**AERIAL PHOTOGRAPH**  
Source: Google Earth



**View of the northern end of the project site facing east**



**View of the project site facing southeast**

**EXHIBIT 2-6**  
**PHOTOGRAPHS OF THE PROJECT SITE**

Source: Blodgett/Baylosis Environmental Planning



**View of the Bannister Avenue facing north**



**View of the Bannister Avenue facing south**

**EXHIBIT 2-7**  
**PHOTOGRAPHS OF THE SURROUNDING AREAS**  
Source: Blodgett/Baylosis Environmental Planning



- Access to 18 of the residential units would be provided by a new private street/cul-de-sac with curb cuts along the east side of Bannister Avenue. Access to the remaining five units will be provided by driveways that will connect with the east side of Bannister Avenue. This internal roadway, which would be located on the easternmost part of the property, will have a curb-to-curb width of 26 feet. Furthermore, no parking would be permitted on the private access road. Overall, a total of 24,978 square feet would be dedicated to the private street and common open space.
- ~~The final determination as to whether Bannister Avenue will continue to remain closed has yet to be made. However, the continued closure of Bannister Avenue or its re-opening, is not directly related to the proposed project's implementation.~~ The City is requiring that the existing Bannister Avenue barrier be removed to facilitate emergency access and response. In addition, improvements will be required to ensure the grade that is currently 7.8% meets the safety requirements of the Fire Department and Public Works Department. The project Applicant has also committed to improving (repaving and the installation of curb and gutters) the segment of Bannister Avenue that is currently a private street, to City standards. This segment of Bannister Avenue will not be a public street. Other changes include the installation of a 3-way stop at the main project entryway with Bannister Avenue and a posted speed limit of 20 MPH for all of Bannister Avenue.
- According to the recommendations of the traffic impact analysis, each unit would be provided with 2 enclosed parking spaces for each unit and 2 additional spaces in the driveways. a 3-car garage and a 3-car capacity driveway for a total of 138 parking spaces in order to meet the City's parking requirements. Under the applicable R-1B zone, 2 enclosed spaces within a garage are required for units with less than 2,000 square feet of floor area while a 3-car garage is required for those units with a gross floor area that is greater than 2,000 square feet or with 4 or more bedrooms.

A conceptual site plan for the proposed project is provided in Exhibit 2-9. As indicated previously the proposed 23 units would include 5 different floor plans (Plan 1 through Plan 5). The site plan was modified to illustrate the elimination of the existing Bannister Avenue traffic barrier.

### **2.4.1 CONSTRUCTION CHARACTERISTICS**

The construction of the entire proposed project (Phases I and II) will take approximately 10 months to complete. The key construction phases are outlined below:

- The demolition phase is anticipated to take 1 month to complete. Equipment on-site during this phase would include concrete industrial saws, rubber tired dozers, tractors/backhoes, and loaders.
- The grading of the site is projected to take 1 month to complete. Equipment on-site during this phase would include graders, tractors, backhoes, and loaders.
- The site preparation phase is projected to take 1 month to complete. Equipment on-site during this phase would include graders, tractors, backhoes, and loaders.



- The construction of the new housing development, new surface parking lot and other improvements would be completed in two phases totaling 5 months. Equipment on-site during this phase would include cranes, generators, forklifts, tractors, backhoes, and loaders. The average number of off-road equipment would total 7 pieces and the average number of daily worker trips will be 13 trips.
- The finishing phases (installation of landscaping, paving of parking areas, etc.) would take an additional 2 months to complete. Equipment on-site during this phase would include cement and motor mixers, pavers, rollers, other paving equipment, tractors, backhoes, and loaders.

## **2.5 OBJECTIVES OF THE PROJECT**

The City of El Monte seeks to accomplish the following objectives with the proposed project:

- To facilitate the integration of land uses and development;
- To minimize conflicts between non-residential and residential uses and/or other sensitive receptors such as schools, parks, and homes;
- To facilitate the revitalization of vacant parcels in the City;
- To ensure that the project is in conformance with the development policies included in the City of El Monte General Plan; and,
- To promote new infill development along with the more efficient use of underutilized properties in the City.

## **2.6 DISCRETIONARY ACTIONS**

A Discretionary Decision is an action taken by a government agency (for this project, the government agency is the City of El Monte) that calls for an exercise of judgment in deciding whether to approve a project. Discretionary approvals for this project include the following:

- The approval of a General Plan Amendment (No. 02-14);
- The approval of a Zone Change (No. 02-14);
- The approval of a Vesting Tentative Tract Map (No. 72192);
- The approval of a Conditional Use Permit (CUP No. 10-14) to allow for the construction of three or more units for sale;
- The approval of a Conditional Use Permit (CUP No. 11-14) to allow the property to be zoned as Planned Residential Development (PRD);

- The approval of a lot line adjustment;
- The approval of a Density Bonus with Concessions and Waivers; and,
- The review of the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program.

The project Applicant will also need a demolition permit to demolish the existing on-site improvements, a grading permit, a building permit to allow for the construction of the proposed improvements, permits for utility connections, and an occupancy permit.



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## SECTION 3 - ENVIRONMENTAL ANALYSIS

This section of the Initial Study analyzes the potential environmental impacts that may result from the proposed project's implementation. The issue areas evaluated in this Initial Study include:

- Aesthetics (Section 3.1);
- Agricultural & Forestry Resources (Section 3.2);
- Air Quality (Section 3.3);
- Biological Resources (Section 3.4);
- Cultural Resources (Section 3.5);
- Geology & Soils (Section 3.6);
- Greenhouse Gas Emissions; (Section 3.7);
- Hazards & Hazardous Materials (Section 3.8);
- Hydrology & Water Quality (Section 3.9);
- Land Use & Planning (Section 3.10);
- Mineral Resources (Section 3.11);
- Noise (Section 3.12);
- Population & Housing (Section 3.13);
- Public Services (Section 3.14);
- Recreation (Section 3.15);
- Transportation (Section 3.16);
- Utilities (Section 3.17); and,
- Mandatory Findings of Significance (Section 3.18).

The environmental analysis contained in this section reflects the Initial Study Checklist format used by the City of El Monte Economic Development Department, Planning Division in its environmental review process pursuant to and consistent with the CEQA Guidelines as amended. Under each issue area, an assessment of impacts is provided in the form of questions and answers. The analysis contained herein serves as a response to the individual questions. For the evaluation of potential impacts, questions are stated and an answer is provided according to the analysis undertaken as part of this Initial Study's preparation. To each question, there are four possible responses:

- *No Impact.* The approval and subsequent implementation of the proposed project *would not* have any measurable environmental impact on the environment.
- *Less Than Significant Impact.* The approval and subsequent implementation of the proposed project *may have* the potential for affecting the environment, although these impacts will be below levels or thresholds that the City of El Monte or other responsible agencies consider to be significant.
- *Less Than Significant Impact with Mitigation.* The approval and subsequent implementation of the proposed project *may have* the potential to generate impacts that will have a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of mitigation measures.
- *Significant and Unavoidable Impact.* The approval and subsequent implementation of the proposed project may result in environmental impacts that are significant.

### **3.1 AESTHETIC IMPACTS**

#### **3.1.1 THRESHOLDS OF SIGNIFICANCE**

According to the City of El Monte, a project may be deemed to have a significant adverse aesthetic impact if it results in any of the following:

- An adverse effect on a scenic vista;
- Substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- The potential of the project to substantially degrade the existing visual character or quality of the site and its surroundings; or,
- A new source of substantial light and glare that would adversely affect day-time or night-time views in the area.

#### **3.1.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

*A. Would the project affect a scenic vista? Less than Significant Impact.*

The San Gabriel Mountains are located approximately 7 miles to the north of the project site and are the only scenic vistas in the area.<sup>17</sup> The proposed project will not totally obstruct the views of the San Gabriel Mountains. The view of the river channel will also be obstructed though the sides of the river are artificially lined at this location. The greatest visual change associated with the proposed project's implementation involves the elimination of the existing older obsolete structures surrounded with the unmaintained landscaping and their replacement with the new residential development. The demolition of the existing on-site structures and the construction of the new homes would improve the appearance of the project area. The existing structures are older and are unmaintained (the existing on-site improvements within the affected parcels are described in Section 2.2 herein). During the construction phases, the site would be maintained in good condition and secured from public access. Any temporary fencing would also be maintained and any undeveloped surfaces must be maintained free of weeds, rubbish, and construction debris. As a result, the implementation of the proposed project would not result in any adverse impacts.

*B. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? No Impact.*

There are no designated State scenic highways located in the vicinity of the project site.<sup>18</sup> No natural undeveloped areas remain within the project site or the adjacent properties. No historic or unique structures or sites are found within the properties that are currently developed (the nature and extent of historic resources within the project area are discussed herein in Section 3.5).<sup>19</sup> The project site's

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<sup>17</sup> Blodgett/Baylosis Environmental Planning. *Site Survey* (The site visit was conducted on August 14, 2014).

<sup>18</sup> California Department of Transportation. *Official Designated Scenic Highways*. [www.dot.ca.gov](http://www.dot.ca.gov)

<sup>19</sup> U. S. Department of the Interior, National Park Service. *National Register of Historic Places*. <http://nrhp.focus.nps.gov>. 2014.

topography was previously modified as part of the previous development. As a result, the proposed project would not result in any significant adverse impacts on natural scenic resources.

*C. Would the project substantially degrade the existing visual character or quality of the site and its surroundings? No Impact.*

The project site is poorly maintained. The portion of the site that has frontage along Bannister Avenue is currently vacant and is covered over in dirt and un-maintained vegetation. The proposed project will not degrade the existing visual character or quality of the site and the surrounding neighborhood since the 23 unit planned residential development will represent a substantial visual improvement compared to the site's current state. The proposed project will feature modern architecture, improved walls, and new landscaping, and will improve the vacant and un-maintained parts of the site. As a result, no impacts will occur. Following the December 3, 2014 Community Meeting, local residents expressed concerns regarding the unmaintained character of the project site and the presence of vagrants within the vacant residential units. In response to this concern, the City is now requiring the Applicant to visit the site on a biweekly basis and to maintain the property.

*D. Would the project create a new source of substantial light or glare that would adversely affect day- or night-time views in the area? Less than Significant Impact with Mitigation.*

Sources of lighting in the area include lighting from buildings, the parking areas, commercial signage, and street lighting. Light sensitive residential land uses surround the project site on the north, west, and south sides. The perimeters of the project site would be surrounded by planted trees as part of the implementation of the proposed project. The following mitigation measures would be effective in further reducing the potential light and glare impacts:

- The Applicant shall ensure that all lighting meet the equipment and illumination standards of the City to the satisfaction of the Economic Development Department. The zoning code that pertains to the proposed project is 17.40.020.P, lighting systems, which states that for all sites serving three (3) or more dwelling units, the developer shall install an on-site lighting system in all parking areas, vehicular access ways and along major walkways. Such lighting shall be directed onto driveways and walkways within the project and away from dwelling units and adjacent properties. Such lighting system shall be automated using either an electronic time switch device or photoelectric sensor device and the lighting device shall be equipped with vandal resistant covers. The Applicant must also submit an exterior lighting plan for review and approval by the Economic Development Department prior to the issuance of building permits.
- Light equipment shall be designed and installed so that light is directed away from light-sensitive receptors such as the nearby homes. In addition, light standards must be low (no more than 15 feet in height) to eliminate the potential for light trespass.

The mitigation identified above would reduce the potential impacts to levels that are less than significant.

### **3.1.3 CUMULATIVE IMPACTS**

The potential aesthetic impacts related to views, aesthetics, and light and glare are site specific. The mitigation measures identified for aesthetic impacts are consistent with those that would likely be required for any new development in the City. The analysis determined that the proposed project would not result in any significant adverse aesthetic impacts with adherence to the required mitigation. As a result, no cumulative aesthetic impacts are anticipated.

### **3.1.4 MITIGATION MEASURES**

The following mitigation measures would be effective in reducing the potential light and glare impacts from these above off-site locations:

*Mitigation Measure No. 1 (Aesthetic Impacts).* The Applicant shall ensure that all lighting meet the equipment and illumination standards of the City to the satisfaction of the Economic Development Department. The zoning code that pertains to the proposed project is 17.40.020.P, lighting systems, which states that for all sites serving three (3) or more dwelling units, the developer shall install an on-site lighting system in all parking areas, vehicular access ways and along major walkways. Such lighting shall be directed onto driveways and walkways within the project and away from dwelling units and adjacent properties. Such lighting system shall be automated using either an electronic time switch device or photoelectric sensor device and the lighting device shall be equipped with vandal resistant covers. The Applicant must also submit an exterior lighting plan for review and approval by the Economic Development Department prior to the issuance of building permits.

*Mitigation Measure No. 2 (Aesthetic Impacts).* Light equipment shall be designed and installed so that light is directed away from light-sensitive receptors such as the nearby homes. In addition, light standards must be low (no more than 15 feet in height) to eliminate the potential for light trespass.

## **3.2 AGRICULTURE AND FORESTRY RESOURCES IMPACTS**

### **3.2.1 THRESHOLDS OF SIGNIFICANCE**

According to the City of El Monte, a project may be deemed to have a significant impact on agriculture resources if it results in any of the following:

- The conversion of prime farmland, unique farmland or farmland of Statewide importance;
- A conflict with existing zoning for agricultural use or a Williamson Act Contract;
- A conflict with existing zoning for or cause rezoning of, forest land (as defined in Public Resources Code §4526), or zoned timberland production (as defined by Government Code §51104[g]);
- The loss of forest land or the conversion of forest land to a non-forest use; or
- Changes to the existing environment that due to their location or nature may result in the conversion of farmland to non-agricultural uses.

### **3.2.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

*A. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? No Impact.*

The soils that underlie the project site are classified by the United States Soil Conservation Service as belonging to the Tujunga-Soboba Soils Association.<sup>20</sup> This soil association is not considered to be “Prime Farmland Soils” in the urban areas of Los Angeles County. This soil association is a result of alluvial deposition that occurred prior to the area’s urbanization. In addition, there are no ongoing agricultural activities located within or adjacent to the project site (land cover in the area is shown in Exhibit 3-1); however, the current and future zoning designation (R-1B) for the residentially zoned portion of the site permits the breeding, hatching, raising, and fattening of poultry, fowl, nutria, birds, rabbits, chinchillas, earthworms, fish, frogs, and bees for domestic or commercial use as well as the keeping of horses.<sup>21</sup> The site’s permitted “primary use” is residential and the agricultural activities are accessory uses. As a result, no impacts on prime farmland soils would occur with the implementation of the proposed project.

*B. Would the project conflict with existing zoning for agricultural use or a Williamson Act Contract? No Impact.*

The City’s applicable General Plan and Zoning designations for the project site does not contemplate commercial agricultural land uses. In addition, the project site is not subject to a Williamson Act Contract.

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<sup>20</sup> State of. Department of Conservation. *Farmland Mapping and Monitoring Program*. July 13, 1995.

<sup>21</sup> City of El Monte Municipal Code. Title 17 Zoning. Chapter 17.34.010 – Uses permitted for the R-1B.

As a result, no impacts on existing or future Williamson Act Contracts would result from the proposed project's implementation.

*C. Would the project conflict with existing zoning for or cause rezoning of, forest land (as defined in Public Resources Code Section 4526), or zoned timberland production (as defined by Government Code § 51104[g])? No Impact.*

The City of El Monte is located in the midst of a larger urban area and no forest lands are found within the City or in the surrounding area.<sup>22</sup> In addition, the City of El Monte General Plan does not provide for any forest land protection since it is not required. As a result, no impacts on forest land or timber resources would result from the implementation of the proposed project.

*D. Would the project result in the loss of forest land or the conversion of forest land to a non-forest use? No Impact.*

The project site is located in the midst of an urban area. No forest land is located within the City nor does the City of El Monte General Plan provide for any forest land protection.<sup>23</sup> As a result, no loss or conversion of forest lands would result from the implementation of the proposed project.

*E. Would the project involve other changes in the existing environment that, due to their location or nature, may result in conversion of farmland to non-agricultural use? No Impact.*

No agricultural activities or farmland uses are located within or adjacent to the project site.<sup>24</sup> As indicated previously, the site is currently partially developed and no agricultural activities are located within the project site or in the surrounding area. As a result, the implementation of the proposed project would not involve the conversion of any existing farmland area to urban uses.

### **3.2.3 CUMULATIVE IMPACTS**

The analysis determined that there is no remaining agricultural or forestry resources in the affected area. The project would not result in any impacts on these resources. As a result, no cumulative impacts on agricultural or farmland resources will occur.

### **3.2.4 MITIGATION MEASURES**

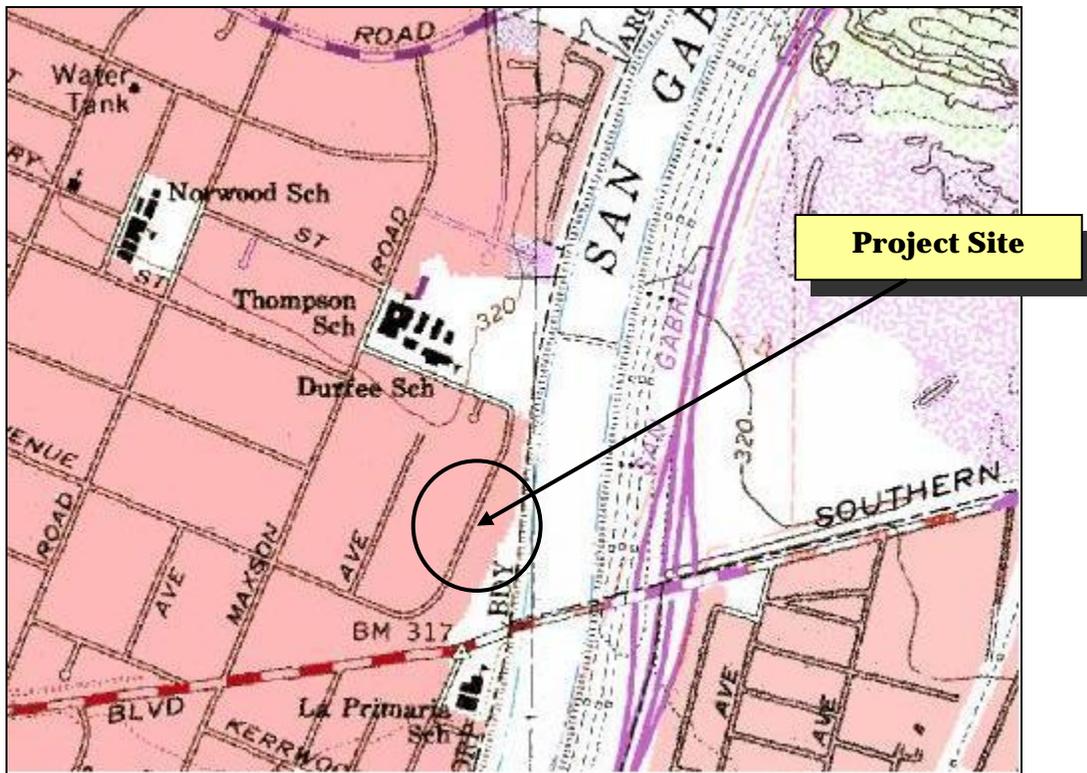
The analysis of agriculture and forestry resources indicated that no impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

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<sup>22</sup> Blodgett/Baylosis Environmental Planning. *Site Survey*, August 14, 2014. Also refer to the United States Geological Survey. TerraServer USA. *The National Map – El Monte, California*. July 1, 1979.

<sup>23</sup> City of El Monte (and Planning Center). *General Plan and Zoning Code Update and EIR Existing Conditions Report*. May 24, 2006.

<sup>24</sup> Blodgett/Baylosis Environmental Planning. *Site Survey*, August 14, 2014. Also refer to the United States Geological Survey. TerraServer USA. *The National Map – El Monte, California*. July 1, 1979.



**EXHIBIT 3-1**  
**LAND COVER AROUND THE PROJECT SITE**  
Source: United States Geological Survey

### 3.3 AIR QUALITY IMPACTS

#### 3.3.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, a project would normally be deemed to have a significant adverse environmental impact on air quality, if it results in any of the following:

- A conflict with the obstruction of the implementation of the applicable air quality plan;
- A violation of an air quality standard or contribute substantially to an existing or projected air quality violation;
- 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;
- The exposure of sensitive receptors to substantial pollutant concentrations; or
- The creation of objectionable odors affecting a substantial number of people.

The South Coast Air Quality Management District (SCAQMD) has established quantitative thresholds for both short-term (construction) emissions and long-term (operational) emissions for criteria pollutants. These criteria pollutants include the following:

- *Ozone (O<sub>3</sub>)* is a nearly colorless gas that irritates the lungs and damages materials and vegetation. O<sub>3</sub> is formed by photochemical reaction. Los Angeles and the surrounding South Coast Air Basin (SCAB) is designated by the Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) as an extreme ozone *non-attainment area*.<sup>25</sup>
- *Carbon Monoxide (CO)* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain that is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust. The SCAB is designated as an attainment area for carbon monoxide by the EPA.
- *Nitrogen dioxide (NO<sub>2</sub>)* is a yellowish-brown gas that, at high levels, can cause breathing difficulties. NO<sub>2</sub> is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. Although NO<sub>2</sub> concentrations have not exceeded National standards since 1991, NO<sub>2</sub> emissions remain a concern because of their contribution to the formation of ozone (O<sub>3</sub>) and particulate matter. The SCAB is designated as an attainment area for NO<sub>2</sub> by the EPA.
- *Sulfur dioxide (SO<sub>2</sub>)* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children. Though SO<sub>2</sub> concentrations have been reduced to levels that are well below State and Federal standards, further reductions in SO<sub>2</sub> emissions are desirable since SO<sub>2</sub> is a precursor to sulfate and PM<sub>10</sub>. The SCAB is designated as an attainment area for SO<sub>2</sub> by the EPA.

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<sup>25</sup> A non-attainment area refers to a geographic area where the Environmental Protection Agency (EPA) and/or the California Air Resources Board (CARB) have determined that the air quality standards for the criteria pollutants are not being met.

- $PM_{10}$  refers to particulate matter less than ten microns in diameter.  $PM_{10}$  particulates cause a greater health risk than larger-sized particles since fine particles can more easily cause respiratory irritation. The Federal standards for  $PM_{10}$  have been met in most areas within the SCAB, though standards were exceeded in portions of Riverside County.
- $PM_{2.5}$  refers to particulate matter less than 2.5 microns in diameter.  $PM_{2.5}$  also represents a significant health risk because particulate matter of this size may be more easily inhaled causing respiratory irritation. The annual average concentrations of  $PM_{2.5}$  exceeded Federal standards in some areas of the SCAB. As a result, the SCAB continues to be designated non-attainment for  $PM_{2.5}$ .

Projects in the South Coast Air Basin (SCAB) generating *construction-related* emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA:

- 75 pounds per day of reactive organic compounds;
- 100 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of  $PM_{10}$ ;
- 55 pounds per day of  $PM_{2.5}$ ; or,
- 150 pounds per day of sulfur oxides.

A project would have a significant effect on air quality if any of the following *operational* emissions thresholds for criteria pollutants are exceeded:

- 55 pounds per day of reactive organic compounds;
- 55 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of  $PM_{10}$ ;
- 55 pounds per day of  $PM_{2.5}$ ; or,
- 150 pounds per day of sulfur oxides.

### **3.3.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

A. *Would the project conflict with or obstruct the implementation of the applicable air quality plan? No Impact.*

The City of El Monte is located within the SCAB which covers a 6,600-square-mile area within Orange County and the non-desert portions of Los Angeles County, Riverside County, and San Bernardino County. Air quality in the basin is monitored by the SCAQMD at various monitoring stations located throughout the area.<sup>26</sup> The most recent AQMP was adopted in 2012 and was jointly prepared with the CARB and the Southern California Association of Governments (SCAG).<sup>27</sup>

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<sup>26</sup> South Coast Air Quality Management District. *Final 2012 Air Quality Plan*. Adopted 2012.

<sup>27</sup> South Coast Air Quality Management District. *Final 2012 Air Quality Plan*. Adopted 2012.

The AQMP would help the SCAQMD to maintain a focus on the air quality impacts of major projects associated with goods movement, land use, energy efficiency and other key areas of growth. Key elements of the 2012 AQMP include enhancements to existing programs to meet the 24-hour PM<sub>2.5</sub> Federal health standard and a proposed plan of action to reduce ground-level ozone. The primary criteria pollutants that remain non-attainment in the local area include PM<sub>2.5</sub> and Ozone. Specific criteria for determining a project's conformity with the AQMP is defined in Section 12.3 of the SCAQMD's CEQA Air Quality Handbook. The Air Quality Handbook refers to the following criteria as a means to determine a project's conformity with the AQMP:<sup>28</sup>

- *Consistency Criteria 1* refers to a proposed project's potential for resulting in an increase in the frequency or severity of an existing air quality violation or its potential for contributing to the continuation of an existing air quality violation.
- *Consistency Criteria 2* refers to a proposed project's potential for exceeding the assumptions included in the AQMP or other regional growth projections relevant to the AQMP's implementation.

In terms of Criteria 1, the proposed project's long-term (operational) airborne emissions would be below levels that the SCAQMD considers as a significant adverse impact (refer to the analysis included in the next section where the long-term stationary and mobile emissions for the proposed project are summarized in Table 3-3). According to the Growth Forecast released by SCAG in conjunction with the Regional Transportation Plan for 2012-2035, the City of El Monte is projected to have 140,100 residents by 2035.<sup>29</sup> The City has a total population of 113,475 according to the data collected by the U. S. Census Bureau for the 2010 Census. The proposed project will require both a GPA (from Low Density Residential and Public Facilities to Medium Density Residential) and a Zone Change (from R-1B and Public Facilities to R-3 Medium-Density Multiple-Family dwelling zone) to permit the construction of a planned community development.

The population increase from the proposed project's implementation is within the expected population projection provided by SCAG (the proposed project is projected to add 92 new residents to the City based upon the number of units being constructed and the average household size for the City taken from the United States Census Bureau website). Therefore, the proposed project would also conform to Consistency Criteria 2 since it would not significantly affect any regional population, housing, and employment projections prepared for the City of El Monte by the Southern California Association of Governments (SCAG). The proposed project's conformity with Criteria 1 and Criteria 2 are summarized in Table 3-10 on the following page.

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<sup>28</sup> South Coast Air Quality Management District. *CEQA Air Quality Handbook*. April 1993.

<sup>29</sup> Southern California Association of Governments Regional Transportation Plan 2012-2035, Growth Forecast Appendix. Adopted April 2012.

**Table 3-1  
 Air Quality Conformity Criteria**

Issue	Description	Findings
Criteria #1	Will the project result in an increase in the frequency or severity of an existing air quality violation or in the continuation of a violation?	The project's emissions are below SCAQMD thresholds of significance. Refer to Table 3-3 included in this section that indicates the long-term emissions and the daily thresholds.
Criteria #2	Will the project exceed the assumptions included in the AQMP or other regional growth projections relevant to them?	The project will not result in an exceedance of regional or local growth projections for housing, population or employment.
Criteria Pollutants	The SCAQMD indicates the daily emissions levels that will constitute a significant adverse impact.	Following development, the proposed project will not generate mobile or stationary emissions that will exceed the SCAQMD's daily thresholds for significance (refer to Table 3-3).

Source: South Coast Air Quality Management District.

The proposed 23 unit residential development is not considered by the SCAQMD to be a regionally significant project.<sup>30</sup> The project would not adversely affect any regional population, housing, and employment projections prepared for the City by SCAG (refer to the analysis of population and housing impacts provided herein in Section 3.13) and the proposed project does not conflict with the Growth Management Plan. Finally, the project is not subject to the requirements of the AQMP's PM<sub>10</sub> Program, which is limited to the desert portions of the SCAQMD's planning area. As a result, the proposed project would not be in conflict with or result in an obstruction of an applicable air quality plan and no impacts would occur.

*B. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation? Less than Significant Impact with Mitigation.*

The potential construction-related emissions from the proposed project were estimated using the computer model CalEEMod developed for the SCAQMD (the worksheets are included in the Appendix). The entire project construction period is expected to last for approximately 10 months (refer to Section 2.4.1) and would include the demolition of the existing obsolete structures, grading and site preparation, the erection of the new building, and the finishing of the project (installation of pavement, painting, and installation of landscaping).

The analysis of daily construction emissions also utilized the CalEEMod computer model. The assumptions regarding the construction phases and the length of construction for each phase followed those identified herein in Section 2.4.1. The other variables, including construction equipment types, number of employees, etc., relied on the default values included in the computer model. During the grading and site preparation phase, approximately 26,000 cubic yards of fill and unconsolidated soils will be removed and then re-compacted. A total of 19,800 cubic yards will then be imported to the site. This grading and the attendant truck trips were considered in the CalEEMod analysis.

The estimated daily construction emissions (shown in Table 3-2) assume compliance with applicable SCAQMD rules and regulations for the control of fugitive dust and architectural coating emissions, which

<sup>30</sup> South Coast Air Quality Management District. *CEQA Air Quality Handbook*. April 1993 [as amended 2009].

include, but are not limited to, water active grading of the sites and unpaved surfaces at least three times daily, daily clean-up of mud and dirt carried onto paved streets from the sites, and the use of low VOC paint. As shown in Table 3-2, daily construction emissions would not exceed the SCAQMD significance thresholds. Therefore, the daily construction emissions associated with the proposed project would be less than significant.

**Table 3-2  
 Estimated Daily Construction Emissions**

<b>Construction Phase</b>	<b>ROG</b>	<b>NO<sub>2</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Demolition (on-site)	3.06	29.67	22.05	0.02	1.86	1.74
Demolition (off-site)	0.29	0.08	0.99	--	0.14	0.03
<b>Total Demolition Phase</b>	<b>3.35</b>	<b>29.75</b>	<b>23.04</b>	<b>0.02</b>	<b>2.00</b>	<b>1.77</b>
Site Preparation (on-site)	2.82	32.46	18.67	0.02	1.74	1.48
Site Preparation (off-site)	0.18	0.04	0.61	--	0.09	0.02
<b>Total Site Preparation</b>	<b>3.00</b>	<b>32.50</b>	<b>19.28</b>	<b>0.02</b>	<b>1.83</b>	<b>1.50</b>
Grading (on-site)	2.96	31.26	20.20	0.02	8.04	4.95
Grading (off-site)	5.34	37.45	26.25	0.08	2.78	1.15
<b>Total Grading</b>	<b>8.30</b>	<b>68.71</b>	<b>46.45</b>	<b>1.00</b>	<b>10.82</b>	<b>6.10</b>
Building Construction (on-site)	4.02	25.83	17.04	0.02	1.75	1.68
Building Construction (off-site)	0.21	0.24	0.83	--	0.10	0.03
<b>Total Building Construction</b>	<b>4.23</b>	<b>26.07</b>	<b>17.87</b>	<b>0.02</b>	<b>1.85</b>	<b>1.71</b>
Paving (on-site)	1.94	19.75	12.26	0.01	1.24	1.14
Paving (off-site)	0.33	0.09	1.14	--	0.16	0.04
<b>Total Paving</b>	<b>2.27</b>	<b>19.84</b>	<b>13.4</b>	<b>0.01</b>	<b>1.4</b>	<b>1.18</b>
Architectural Coatings (on-site)	36.87	2.57	1.90	--	0.22	0.22
Architectural Coatings (off-site)	0.04	0.01	0.15	--	0.02	--
<b>Total Architectural Coatings</b>	<b>36.91</b>	<b>2.58</b>	<b>2.05</b>	<b>--</b>	<b>0.24</b>	<b>0.22</b>
<b>Maximum Day</b>	<b>36.91</b>	<b>68.71</b>	<b>46.45</b>	<b>0.11</b>	<b>10.82</b>	<b>6.11</b>
<b>Daily Thresholds</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>

Source: California Air Resources Board CalEEMod [computer program].

Long-term emissions refer to those air quality impacts that would occur once the proposed project is operational. These impacts would continue over the operational life of the project. The long-term air quality impacts associated with the proposed project include mobile emissions associated with vehicular traffic and off-site stationary emissions associated with the generation of energy (natural gas and electrical). The analysis of long-term operational impacts also used the CalEEMod computer model. The assumptions used in the model relied on those default variables that are included in the model. These independent variables included energy consumption, climate zone, vehicle trip generation, modal split, and vehicle miles traveled. As indicated in Table 3-3, the projected long-term emissions would be below those thresholds considered to be a significant impact.

**Table 3-3**  
**Estimated Operational Emissions in lbs/day**

<b>Emission Source</b>	<b>ROG</b>	<b>NO<sub>2</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Area-wide (lbs/day)	8.44	0.18	13.45	0.19	1.77	1.77
Energy (lbs/day)	0.02	0.17	0.07	--	0.01	0.01
Mobile (lbs/day)	2,79	2.65	10.90	0.03	1.72	0.49
<b>Total (lbs/day)</b>	<b>11.25</b>	<b>3.00</b>	<b>24.46</b>	<b>0.05</b>	<b>3.50</b>	<b>2.27</b>
<b>Daily Thresholds</b>	<b>55</b>	<b>55</b>	<b>55o</b>	<b>15o</b>	<b>15o</b>	<b>55</b>

Source: California Air Resources Board CalEEMod [computer program].

While the projected short-term and long-term emissions are below thresholds considered to represent a significant adverse impact, mitigation has been recommended since the project area is located in a non-attainment area for ozone and particulates. The following measures would be applicable to the proposed project as a means to mitigate potential construction emissions:

- The Applicant shall ensure that the grading and building contractors adhere to all pertinent provisions of Rule 403 pertaining to the generation of fugitive dust during grading and/or the use of equipment on unpaved surfaces. The contractors would be responsible for being familiar with and implementing any pertinent best available control measures.
- All materials transported off-site shall either be sufficiently watered or securely covered to prevent excessive amounts of dust and spillage.
- All clearing, earthmoving, or excavation activities shall be discontinued during periods of high winds (i.e. greater than 15 mph), so as to prevent excessive amounts of fugitive dust.
- The Applicant shall ensure that trucks carrying demolition debris are hosed off before leaving the construction site.
- The Applicant shall ensure that the contractors adhere to all pertinent SCAQMD protocols such as Rule 403, regarding grading, site preparation, and construction activities. General mitigation within Rule 403 requires that all trucks hauling, dirt, sand, soil or other loose materials are covered, or should maintain at least two feet of freeboard in accordance with California Vehicle Code (CVC) Section 23114, (freeboard means vertical space between the top of the load and top of the trailer), installing wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip, and applying water or chemical suppressants to maintain a stabilized surface after completing road shoulder maintenance (which is important since there is no sidewalk along the west side of the project site, only dirt which extends from the site and overlaps the Bannister Avenue pavement).

The aforementioned mitigation would reduce the potential impacts to levels that are less than significant.

C. *Would the project 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)? Less than Significant Impact.*

As indicated in the previous section, the proposed project would result in short-term (construction-related) impacts and long-term (operational) impacts. The potential long-term (operational) and short-term (construction) emissions associated with the proposed project are compared to the SCAQMD's daily emissions thresholds in Tables 3-2 and 3-3, respectively. As indicated in these tables, the short-term and long-term emissions would not exceed the SCAQMD's daily thresholds.

The proposed project would contribute incrementally to the SCAB's current non-attainment status in the absence of mitigation. The SCAB is currently non-attainment for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. The major local sources for long-term emissions associated with the occupancy of the proposed project would be associated with vehicle trips to and from the residences. While the proposed project would result in additional vehicle trips, there would be a regional benefit in terms of a reduction in vehicle miles traveled (VMT) because it is an infill project that is consistent with the regional and the State's sustainable growth objectives. Finally, the proposed project would not exceed these adopted projections used in the preparation of the Regional Transportation Plan (refer to the discussion included in Subsection A). The potential cumulative air quality impacts are deemed to be less than significant.

D. *Would the project expose sensitive receptors to substantial pollutant concentrations? Less than Significant Impact.*

Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality and typically include homes, schools, playgrounds, hospitals, convalescent homes, and other facilities where children or the elderly may congregate.<sup>31</sup> These population groups are generally more sensitive to poor air quality. The neighboring residential units are considered to be sensitive receptors.<sup>32</sup> Most vehicles generate carbon monoxide (CO) as part of the tail-pipe emissions and high concentrations of CO along busy roadways and congested intersections are a concern. The areas surrounding the most congested intersections are often found to contain high levels of CO that exceed applicable standards and are referred to as *hot spots*. Three variables influence the creation of a hot-spot: traffic volumes, traffic congestion, and the background CO concentrations for the source receptor area. Typically, a hot-spot may occur near an intersection that is experiencing severe congestion (a LOS E or LOS F). However, within the last decade, decreasing background levels and more effective vehicle emission controls have dramatically reduced the potential for the creation of hot spots. The SCAQMD stated in its CEQA Handbook that a CO hotspot would not likely develop at an intersection operating at LOS C or better. Since the Handbook was written, there have been new CO emissions controls added to vehicles and reformulated fuels are now sold in the SCAB. These new automobile emissions controls, along with the reformulated fuels, have resulted in a lowering of both ambient CO concentrations and vehicle emissions.

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<sup>31</sup> South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix 9*, 2004 (as amended).

<sup>32</sup> Ibid.

The proposed use would generate approximately 17 trip ends during the morning (AM) peak hour traffic period and 23 trip ends during the evening (PM) peak hour. This additional peak hour traffic would not be great enough to lead to a significant net increase in traffic congestion that would result in a significant decline in an intersection's level of service (LOS E or F). The SCAQMD is requesting that local governments indicate whether a proposed project would impact a sensitive receptor resulting in an exceedance of *localized emissions thresholds* or *LSTs*. LSTs only apply to short-term (construction) and long-term (operational) emissions at a fixed location and do not include off-site or area-wide emissions. Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality. Sensitive receptors, including homes and schools in the vicinity of the proposed project site, are identified in the map provided in Exhibit 3-2. The project site is located near a number of sensitive receptors that include the following:

- Homes are located adjacent to the project sites along the southwest side of Bannister Avenue. Residentially developed parcels are located near the parcels that would contain the new planned residential development (refer to Exhibit 2-5).<sup>33</sup>
- Homes are located south of the project sites along the east side of Lambert Avenue. These homes are separated from the project sites by the aforementioned roadway.
- Ramona Boulevard extends 537 feet to the south of the project site in an east-west orientation.<sup>34</sup> Fernando R Ledesma High School occupies frontage along the north side of Ramona Boulevard. The High School also directly abuts the project site to the south.
- La Primaria Elementary School is located directly across Fernando R Ledesma High School on the south side of Ramona Boulevard, and Wright Elementary School to the west of the project site. Residential development is located along the north side of Ramona Boulevard directly to the west of the High School.
- The south side of Ramona Boulevard to the west of the Elementary School features a mix of both residential development, and commercial uses including a carwash, 7-Eleven, Taco N Trento, Bagworld, and El Dorado Tires.<sup>35</sup>
- In addition, there is a preschool (Burdick's) located on the corner of Ramona Boulevard and Maxson Road, and 2 bus stops (Ramona/Gilman and Ramona/Maxson) in the vicinity of the project site.<sup>36</sup>

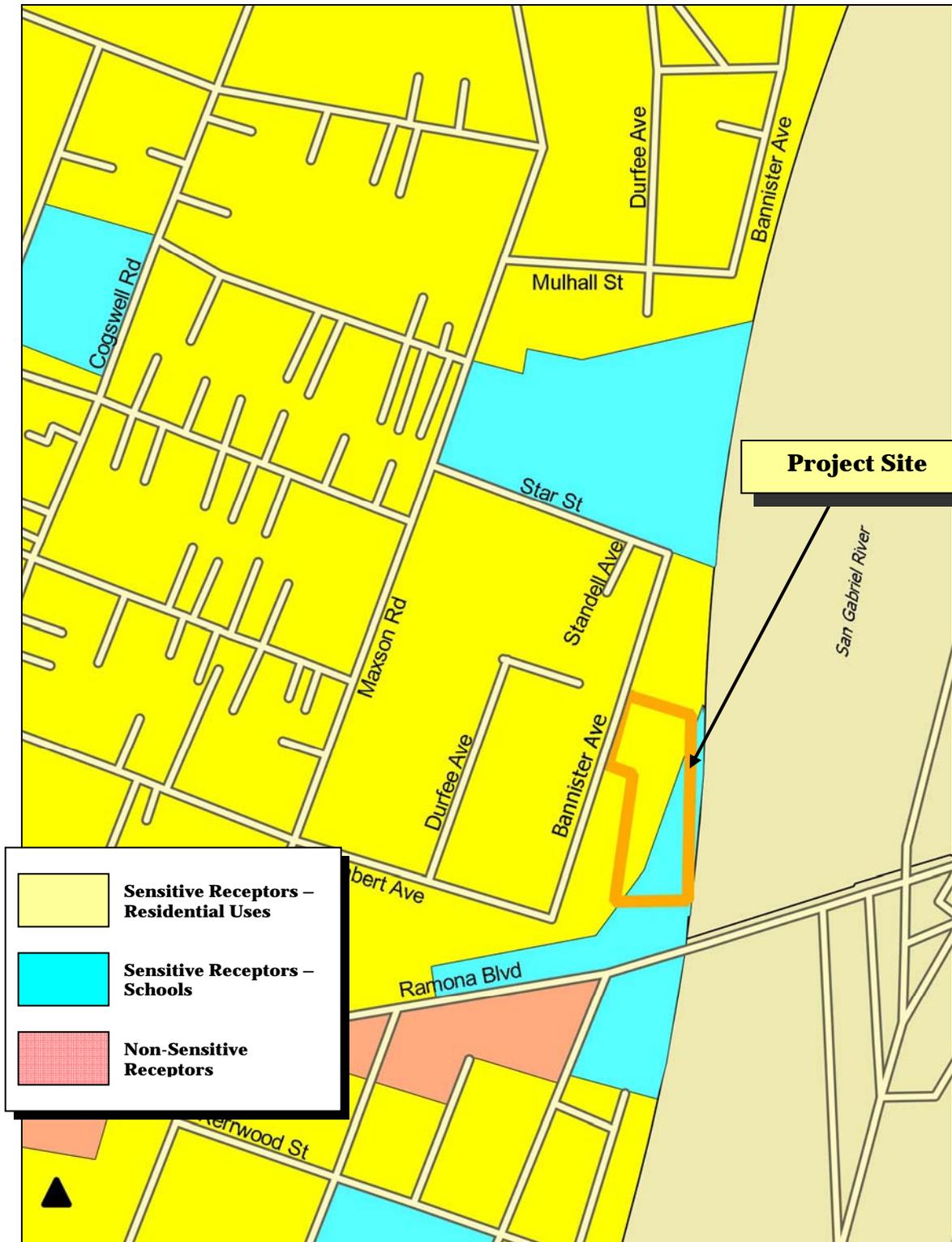
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<sup>33</sup> Blodgett/Baylosis Environmental Planning. *Site Survey* (The site visit was conducted on August 14, 2014.)

<sup>34</sup> Google Earth.

<sup>35</sup> Blodgett/Baylosis Environmental Planning. *Site Survey* (The site visit was conducted on August 14, 2014.)

<sup>36</sup> Ibid.



**EXHIBIT 3-2**  
**SENSITIVE RECEPTORS**  
Source: Blodgett/Baylosis Environmental Planning

The SCAQMD has developed a number of methodologies to assist in the completion of the LST analysis. The approach used in the analysis of the proposed project utilized a number of screening tables that identified maximum allowable emissions (in pounds per day) at a specified distance to a receptor. The pollutants that are the focus of the LST analysis include the conversion of NO<sub>x</sub> to NO<sub>2</sub>; carbon monoxide (CO) emissions from construction and operations; PM<sub>10</sub> emissions from construction and operations; and PM<sub>2.5</sub> emissions from construction and operations.

The use of the “look-up tables” is permitted since each of the construction phases would involve the disturbance of less than five acres of land area. As indicated in Table 3-4, the proposed project would not exceed any LSTs based on the information included in the Mass Rate LST Look-up Tables provided by the SCAQMD. For purposes of the LST analysis, the receptor distance used was just over 25 meters. As indicated in the table, the proposed project would not exceed any LSTs based on the information included in the Mass Rate LST Look-up Tables. As a result, the impacts are expected to be less than significant.

**Table 3-4  
Local Significance Thresholds Exceedance SRA 9**

Emissions	Project Emissions (lbs/day)	Type	Allowable Emissions Threshold (lbs/day) and a Specified Distance from Receptor (in meters)				
			25	50	100	200	500
NO <sub>2</sub>	25.83	Construction	<b>203</b>	227	286	368	584
NO <sub>2</sub>	3.00	Operations	<b>203</b>	227	286	368	584
CO	17.04	Construction	<b>733</b>	2,299	3,689	7,600	25,558
CO	24.46	Operations	<b>733</b>	2,299	3,689	7,600	25,558
PM <sub>10</sub>	3.50	Operations	<b>4</b>	11	16	26	55
PM <sub>10</sub>	1.75	Construction	<b>14</b>	43	63	105	229
PM <sub>2.5</sub>	2.27	Operations	<b>2</b>	3	5	9	28
PM <sub>2.5</sub>	1.68	Construction	<b>8</b>	11	17	35	116

Source: South Coast Air Quality Management District. Final Localized Significance Threshold Methodology. June 2003.

*E. Would the project create objectionable odors affecting a substantial number of people? Less than Significant Impact with Mitigation.*

The SCAQMD has identified land uses that are typically associated with odor complaints. These uses include activities involving livestock, rendering, businesses involved in fiberglass molding.<sup>37</sup> During the site visit, trash and livestock odors were observed on-site. In addition, construction activities may involve the use of diesel equipment which may result in odors. As a result, the following measure is required:

- To ensure that odors from diesel equipment are kept to a minimum, the project Contractors shall ensure that all diesel trucks and equipment are not left to idle for longer than five minutes.

Adherence to the recommendation will reduce impacts to levels that are less than significant.

<sup>37</sup> South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix 9*. 2004 (as amended).

### **3.3.3 CUMULATIVE IMPACTS**

The proposed project's implementation would not result in any new exceedance of air pollution standards nor contribute significantly to an existing air quality violation. Furthermore, the analysis determined that the implementation of the proposed project would not result in any significant adverse air quality impacts. As a result, no significant adverse cumulative impacts would occur.

### **3.3.4 MITIGATION MEASURES**

As indicated previously, the proposed project would not result in any significant adverse operational air quality impacts. However, the following mitigation measures would be effective in further reducing potential air emissions related to construction activities:

*Mitigation Measure No. 3 (Air Quality Impacts).* The Applicant shall ensure that the grading and building contractors adhere to all pertinent provisions of Rule 403 pertaining to the generation of fugitive dust during grading and/or the use of equipment on unpaved surfaces. The contractors would be responsible for being familiar with, and implementing any pertinent best available control measures.

*Mitigation Measure No. 4 (Air Quality Impacts).* All materials transported off-site shall either be sufficiently watered or securely covered to prevent excessive amounts of dust and spillage.

*Mitigation Measure No. 5 (Air Quality Impacts).* All clearing, earthmoving, or excavation activities shall be discontinued during periods of high winds (i.e. greater than 15 mph), so as to prevent excessive amounts of fugitive dust.

*Mitigation Measure No. 6 (Air Quality Impacts).* The Applicant shall ensure that trucks carrying demolition debris are hosed off before leaving the construction site.

*Mitigation Measure No. 7 (Air Quality Impacts).* The Applicant shall ensure that the contractors adhere to all pertinent SCAQMD protocols such as Rule 403, regarding grading, site preparation, and construction activities. General mitigation within rule 403 includes ensuring that all trucks hauling, dirt, sand, soil or other loose materials are covered, or should maintain at least two feet of freeboard in accordance with California Vehicle Code (CVC) Section 23114, (freeboard means vertical space between the top of the load and top of the trailer), installing wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip, and applying water or chemical suppressants to maintain a stabilized surface after completing road shoulder maintenance (which is important since there is no sidewalk along the west side of the project site, only dirt which extends from the site and overlaps the Bannister Avenue pavement).

*Mitigation Measure No. 8 (Air Quality Impacts).* To ensure that odors from diesel equipment are kept to a minimum, the project Contractors shall ensure that all diesel trucks and equipment are not left to idle for longer than five minutes.

## 3.4 BIOLOGICAL RESOURCES IMPACTS

### 3.4.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, a project may be deemed to have a significant adverse impact on biological resources if it results in any of the following:

- 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 State Department of Fish and Wildlife or the U.S. Fish and Wildlife Service;
- A substantial adverse effect on any riparian habitat or other sensitive natural plant community identified in local or regional plans, policies, regulations, or by the State Department of Fish and Wildlife or the U.S. Fish and Wildlife Service;
- A substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means;
- A substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites;
- A conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or,
- A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

### 3.4.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? No Impact.*

The California Department of Fish and Wildlife, California Natural Diversity Database was consulted to provide a list of all of the special status plant and animal species that could potentially appear or live within the El Monte quadrangle mapped out in the CNDDDB QuickView Tool in BIOS. The search yielded a total of 53 native species in the El Monte Quadrangle that includes the City and the surrounding communities.<sup>38</sup> A total of six endangered or threatened plant and animal species may be found within the boundaries of the El Monte Quadrangle and include the Southwestern Willow Flycatcher, Least Bell's Vireo, Light-footed Clapper Rail, the Willow Flycatcher, Western Yellow-Billed Cuckoo, and Nevins Barberry.<sup>39</sup> The EIR

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<sup>38</sup> California Department of Fish and Wildlife. BIOS Viewer. <https://map.dfg.ca.gov/bios/?tool=cnddbQuick>

<sup>39</sup> Ibid.

prepared for the City's General Plan does not identify any protected species within the vicinity of the project site. However, the El Monte General Plan Background Report noted one occurrence of the western yellow-billed cuckoo (a federal candidate and state endangered species) in the vicinity of the San Gabriel River, near El Monte in 1951; and several occurrences of southwestern pond turtle (a state species of special concern) within the larger El Monte area from 1954 to 1987. Brand's phacelia, a plant species that occurs in alluvial sand in coastal scrub/dune habitats, was noted in 1935 near San Gabriel River, 2 miles east of El Monte. There are no recent occurrences. As a result, no impacts on any candidate, sensitive, or special status species would result from the implementation of the proposed project.

*B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? No Impact.*

The City and the project site are located in an urbanized area. There are no native or natural riparian plant habitats located within the project site.<sup>40</sup> As shown in Exhibit 3-3, the San Gabriel River is a blue line stream. However, the area around the San Gabriel River is developed and the river is channelized. As a result, no impacts on natural or riparian habitats would result from the proposed project's implementation.

*C. Would the project have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? No Impact.*

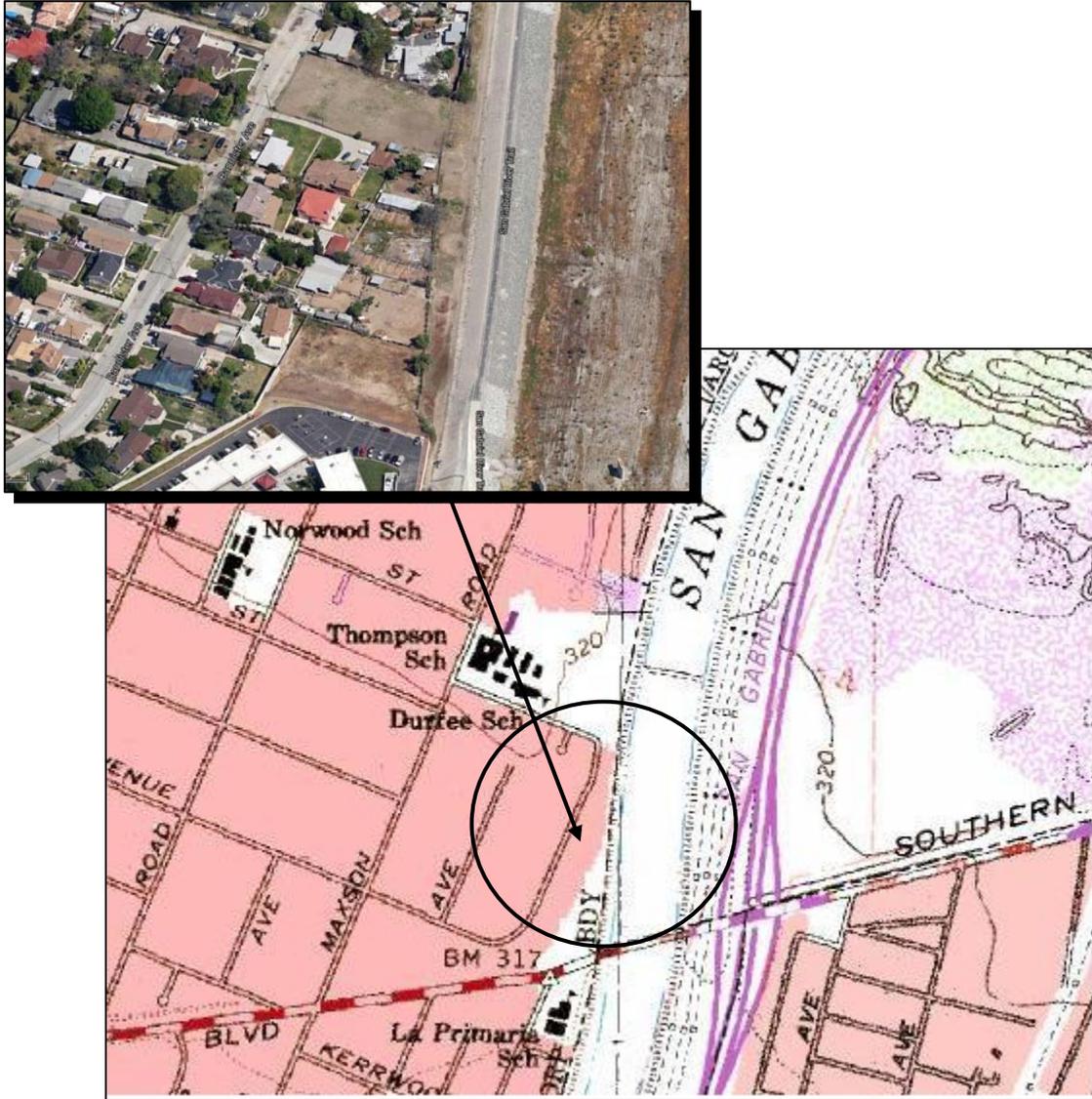
The project site does not contain any wetland habitat. However, the San Gabriel River is classified as a blue line stream that abuts the project site on the east. The proposed development will be restricted to the project site and will not remove, fill, or interrupt the San Gabriel River, which is separated from the project site by a trail and fence. As a result, the implementation of the proposed project would not result in any impact on any protected wetland area or designated blue-line stream.

*D. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites? No Impact.*

The San Gabriel River is a blue line stream that abuts the proposed project to the east. The river may function as an animal migration corridor.<sup>41</sup> The project site is separated from the San Gabriel River by a paved trail and a fence. As a result, the development will not impact the river's utility as a wildlife movement corridor or otherwise impact wildlife forging in the river.

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<sup>40</sup> Blodgett/Baylosis Environmental Planning. *Site Survey* (The site visit was conducted on October 18, 2013.) and United States Geological Survey. TerraServer USA. *The National Map – El Monte, California*. July 1, 1979.



### EXHIBIT 3-3 LAND COVER AROUND THE PROJECT SITE

Source: United States Geological Survey

*E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Less than Significant Impact.*

No Los Angeles County Significant Ecological Area (SEA) is located within El Monte's corporate boundaries. The nearest SEA is the Rio Hondo Wildlife Sanctuary, located 4.3 miles south of the project site. There are 44 *non-native* trees located within the project site that will be removed as a part of the demolition activities. The demolition activities would be required to conform to pertinent sections of the City's Tree Preservation Ordinance (Chapter 14.03) of the El Monte Municipal Code. The Ordinance calls for a replacement ratio of 2:1 (two trees must be placed for every one tree that is removed). A minimum of two, 36-inch box trees must be planted on the project site or adjacent to the public right-of-way. Exhibit 3-4 shows the tree survey for the project site in its current state. As a result, the impacts are considered to be less than significant.

*F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan? No Impact.*

As indicated previously, the City is located within an urbanized setting, and no natural habitat is located within the project site.<sup>42</sup> The proposed project site is located approximately 3.9 miles north of the Whittier Nature Center and the Whittier Narrows Dam County Recreation Area Significant Ecological Area (SEA) No. 42, as designated by the Los Angeles Department of Recreation and Parks. As a result, no impacts on local, regional, or State habitat conservation plans would result from the implementation of the proposed project.

### **3.4.3 CUMULATIVE IMPACTS**

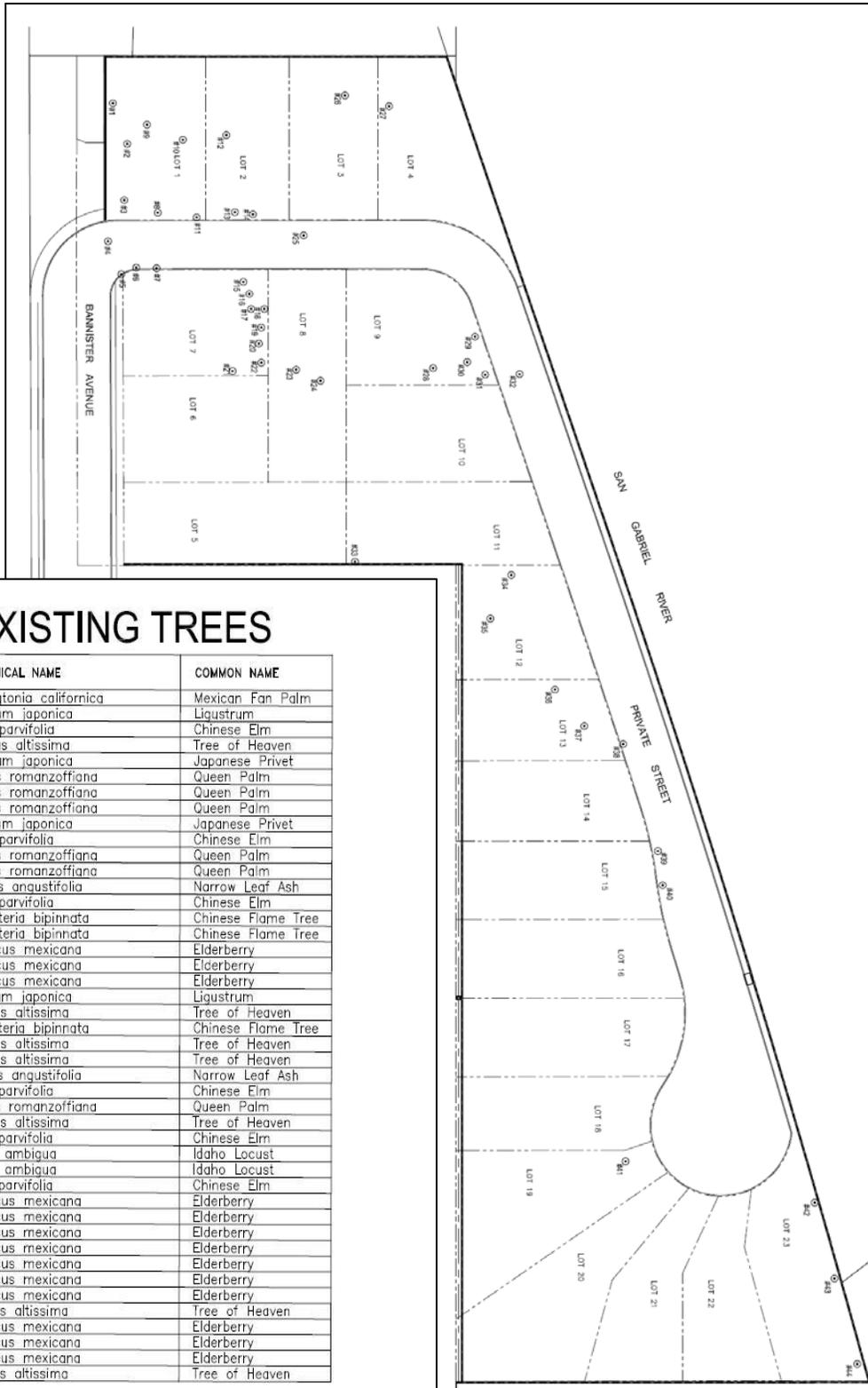
The impacts on biological resources are typically site specific. The proposed project would not involve any loss of protected habitat since no such habitat is found within the project site's boundaries. As a result, no cumulative impacts on biological resources would be associated with the proposed project's implementation.

### **3.4.4 MITIGATION MEASURES**

The analysis indicated that the implementation of the proposed project would not result in any impacts on biological resources. As a result, mitigation is not required at this time.

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<sup>42</sup> Blodgett/Baylosis Environmental Planning. *Site Survey* (The site visit was conducted on August 14, 2014) and United States Geological Survey. TerraServer USA. *The National Map – El Monte, California*. July 1, 1979.



### EXISTING TREES

TREE #	BOTANICAL NAME	COMMON NAME
1	Washingtonia californica	Mexican Fan Palm
2	Ligustrum japonica	Ligustrum
3	Ulmus parvifolia	Chinese Elm
4	Ailanthus altissima	Tree of Heaven
5	Ligustrum japonica	Japanese Privet
6	Syagrus romanzoffiana	Queen Palm
7	Syagrus romanzoffiana	Queen Palm
8	Syagrus romanzoffiana	Queen Palm
9	Ligustrum japonica	Japanese Privet
10	Ulmus parvifolia	Chinese Elm
11	Syagrus romanzoffiana	Queen Palm
12	Syagrus romanzoffiana	Queen Palm
13	Fraxinus angustifolia	Narrow Leaf Ash
14	Ulmus parvifolia	Chinese Elm
15	Koelreuteria bipinnata	Chinese Flame Tree
16	Koelreuteria bipinnata	Chinese Flame Tree
17	Sambucus mexicana	Elderberry
18	Sambucus mexicana	Elderberry
19	Sambucus mexicana	Elderberry
20	Ligustrum japonica	Ligustrum
21	Ailanthus altissima	Tree of Heaven
22	Koelreuteria bipinnata	Chinese Flame Tree
23	Ailanthus altissima	Tree of Heaven
24	Ailanthus altissima	Tree of Heaven
25	Fraxinus angustifolia	Narrow Leaf Ash
26	Ulmus parvifolia	Chinese Elm
27	Syagrus romanzoffiana	Queen Palm
28	Ailanthus altissima	Tree of Heaven
29	Ulmus parvifolia	Chinese Elm
30	Robinia ambigua	Idaho Locust
31	Robinia ambigua	Idaho Locust
32	Ulmus parvifolia	Chinese Elm
33	Sambucus mexicana	Elderberry
34	Sambucus mexicana	Elderberry
35	Sambucus mexicana	Elderberry
36	Sambucus mexicana	Elderberry
37	Sambucus mexicana	Elderberry
38	Sambucus mexicana	Elderberry
39	Sambucus mexicana	Elderberry
40	Ailanthus altissima	Tree of Heaven
41	Sambucus mexicana	Elderberry
42	Sambucus mexicana	Elderberry
43	Sambucus mexicana	Elderberry
44	Ailanthus altissima	Tree of Heaven

NOTE: ALL EXISTING TREES ARE TO BE REMOVED DUE TO SITE GRADING REQUIREMENTS

## EXHIBIT 3-4

### SURVEY OF ALL OF THE EXISTING TREES LOCATED ON-SITE

Source: Phil May Landscape Architect

## 3.5 CULTURAL RESOURCES IMPACTS

### 3.5.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, a project would normally have a significant adverse impact on cultural resources if it results in any of the following:

- A substantial adverse change in the significance of a historical resource as defined in §15064.5 of the State CEQA Guidelines;
- A substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines;
- The destruction of a unique paleontological resource, site or unique geologic feature; or
- The disturbance of any human remains, including those interred outside of formal cemeteries.

### 3.5.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 of the State CEQA Guidelines? No Impact.*

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a local general plan or historic preservation ordinance. A site or structure may also be historically significant according to State or Federal criteria even if the locality does not recognize such significance. The State, through the State Historic Preservation Office (SHPO), maintains an inventory of those sites and structures that are considered to be historically significant. Finally, the U. S. Department of Interior has established specific federal guidelines and criteria that indicate the manner in which a site, structure or district is to be defined as having historic significance and in the determination of its eligibility for listing on the National Register of Historic Places.<sup>43</sup> To be considered eligible for the National Register, a property's significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape or engineering elements. Specific criteria include the following:

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;
- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

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<sup>43</sup> U. S. Department of the Interior, National Park Service. National Register of Historic Places. <http://nrhp.focus.nps.gov>. 2010.

- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield, information important in history or prehistory.

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- A property achieving significance within the past 50 years if it is of exceptional importance.<sup>44</sup>

The State has established California Historical Landmarks that include sites, buildings, features, or events that are of State-wide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. California Points of Historical Interest have a similar definition, except they are deemed of local significance. A search of the California Office of Historic Preservation online list of California Historical Landmarks yielded the following State-designated landmarks in the City:

- *California Register of Historical Resources No. 975 - El Monte First Southern California Settlement by Immigrants from the United States.* This settlement was located on the banks of the San Gabriel River and it played a significant role in California's early pioneer history. This settlement was initially an encampment along the Old Spanish Trail, an extension of the trail from Missouri to Santa Fe. The town-site was established by Texas immigrants and was the first

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<sup>44</sup> U. S. Department of the Interior, National Park Service. National Register of Historic Places. <http://nrhp.focus.nps.gov>. 2010

permanent settlement in Southern California. The State of California designated the Santa Fe Trail Historic Park as a Historical Landmark in 1989.

- *California Point of Historical Interest No. LAN-047 – Old El Monte Jail, Pioneer Park.* The El Monte Jail was constructed by William Dodson and donated to the town in 1880. The original jail was a one room wooden structure and was utilized as a jail until 1922.

Review of the SHPO database indicated there are no National Register designations listed or eligible properties or State landmarks located within or adjacent to the project sites.<sup>45</sup>

In addition, the City's General Plan has not identified the project site as being historically significant. Finally, the existing on-site development does not meet any of the aforementioned criterion for historical significance. Based on the analysis provided herein, no impacts are anticipated.

*B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines? Less than Significant Impact with Mitigation.*

The San Gabriel Valley (and the greater Los Angeles Basin) was previously inhabited by the Gabrielino-Tongva people, named after the San Gabriel Mission.<sup>46</sup> The Gabrielino-Tongva tribe has lived in this region for around 7,000 years.<sup>47</sup> Prior to Spanish contact, approximately 5,000 Gabrielino-Tongva people lived in villages throughout the Los Angeles Basin.<sup>48</sup> Villages were typically located near major rivers such as the San Gabriel, Rio Hondo, or Los Angeles Rivers. Even though the areas surrounding the project site have been heavily disturbed as a part of the previous development, the project site abuts the San Gabriel River to the west. Although unlikely, the degree of grading needed to accommodate the proposed project could possibly unearth an archaeological resource.

In the event that such scenario should occur, conformance to the following mitigation measure will reduce the impacts to levels that are less than significant:

- A qualified archaeologist approved by the Tongva-Gabrielino tribe must be present to monitor the site during grading. In the unlikely event that a human burial or archaeological resources are encountered, all construction activities shall be halted and the El Monte Police Department will be contacted (the Department will then contact the County Coroner). Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA will apply in terms of the identification of significant archaeological resources and their salvage.

The aforementioned mitigation will reduce the impacts to levels that are less than significant.

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<sup>45</sup>State of California State office of Historic Preservation. California Historical Resources. 2011.

<sup>46</sup> Tongva People of Sunland-Tujunga. *Introduction*. [http://www.lausd.k12.ca.us/Verdugo\\_HS/classes/multimedia/intro.html](http://www.lausd.k12.ca.us/Verdugo_HS/classes/multimedia/intro.html)

<sup>47</sup> Ibid.

<sup>48</sup> Rancho Santa Ana Botanical Garden. *Tongva Village Site*. <http://www.rsabg.org/tongva-village-site-1>

C. *Would the project directly or indirectly destroy a unique paleontological resource, site or unique geologic feature? Less than Significant Impact with Mitigation.*

As stated in Section 3.5.2.B, the project site has been subject to extensive disturbance as a result of previous and current development. No unique paleontological or geologic features have been uncovered during the development of the previous uses.

In the unlikely event that any paleontological or geologic resources are discovered, the following mitigation will be required:

- If a paleontological resource is unearthed during construction, all construction related activities must cease immediately. The Applicant will need to seek the advice of a qualified paleontologist/geologist to determine if the resource is deemed to be significant. In the event that the paleontological and/or geologic feature has been determined to be significant, the provisions outlined in Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA will apply.

D. *Would the project disturb any human remains, including those interred outside of formal cemeteries? Less than Significant Impact.*

There are no cemeteries located in the immediate area of the project site. In the unlikely event that human remains are uncovered within the project site, the mitigation provided in Section 3.5.2.B will negate any potential significant impacts. As a result, the impacts are expected to be less than significant.

### **3.5.3 CUMULATIVE IMPACTS**

The potential environmental impacts related to cultural resources are site specific. Furthermore, the analysis also determined that the implementation of the proposed project would not result in any impacts on cultural resources. As a result, no cumulative impacts would occur as part of the implementation of the proposed project.

### **3.5.4 MITIGATION MEASURES**

The analysis of potential cultural resources impacts indicated that the proposed project could potentially impact an archaeological or paleontological resource. Therefore, the following measures have been provided to reduce potential impacts to levels that are less than significant:

*Mitigation Measure No. 9 Cultural Resources).* A qualified archaeologist approved by the Tongva-Gabrielino tribe must be present to monitor the site during grading. In the unlikely event that a human burial or archaeological resources are encountered, all construction activities shall be halted and the El Monte Police Department will be contacted (the Department will then contact the County Coroner). Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA will apply in terms of the identification of significant archaeological resources and their salvage.

*Mitigation Measure No. 10 (Cultural Resources).* If a paleontological resource is unearthed during construction, all construction related activities must cease immediately. The Applicant will need to seek the advice of a qualified paleontologist/geologist to determine if the resource is deemed to be significant. In the event that the paleontological and/or geologic feature has been determined to be significant, the provisions outlined in Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA will apply.

## 3.6 GEOLOGY AND SOILS IMPACTS

### 3.6.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, a project may be deemed to have a significant adverse impact on the environment if it results in the following:

- The exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault (as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault), ground-shaking, liquefaction, or landslides;
- Substantial soil erosion resulting in the loss of topsoil;
- The exposure of people or structures to potential substantial adverse effects, including location on a geologic unit or a 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;
- Locating a project on an expansive soil, as defined in the California Building Code (2012), creating substantial risks to life or property; or
- Locating a project in, or exposing people to potential impacts, including soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

### 3.6.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault (as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault), ground-shaking, liquefaction, or landslides? Less than Significant Impact with Mitigation.*

The City of El Monte is located in a seismically active region as is the entire Los Angeles Basin. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake.<sup>49</sup> The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults.<sup>50</sup> A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. After reviewing the list, it was determined that El Monte is unaffected by the Alquist-Priolo Earthquake Fault Zone Act. There are a number of known faults within relatively close

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<sup>49</sup> California Department of Conservation. *What is the Alquist-Priolo Act* <http://www.conservation.ca.gov/cgs/rghm/ap/Pages/main.aspx>

<sup>50</sup> Ibid.

proximity to the City including the Newport-Inglewood Fault Zone, the Whittier-Elsinore Fault, the Norwalk Fault, and the Elysian Park Fault.<sup>51</sup> The major faults in the region are illustrated in Exhibit 3-5. The Newport-Inglewood Fault Zone consists of a series of northwesterly trending folded hills and faults extending over 40 miles from the Santa Monica Mountains to the offshore area near Newport Beach. The fault segments include the Charnook Fault, the Overland Avenue Fault, the Inglewood Fault, the Portrero Fault, the Avalon-Compton Fault, the Cherry Hill Fault, and the Seal Beach Fault.

The Whittier Fault extends over 20 miles from the Whittier Narrows area continuing southeasterly to the Santa Ana River where it merges with the southeasterly trending Elsinore Fault. These two faults, combined with smaller faults, form the Whittier-Elsinore Fault zone. The San Andreas Fault is located approximately 30 miles to the northeast of El Monte. The fault extends more than 600 miles. An earthquake along the San Andreas Fault zone could affect most of Southern California.<sup>52</sup> Since the City is not located within an area designated as an Alquist-Priolo Special Studies Zone, there are no known *fault rupture* hazards that are anticipated to impact the project site.

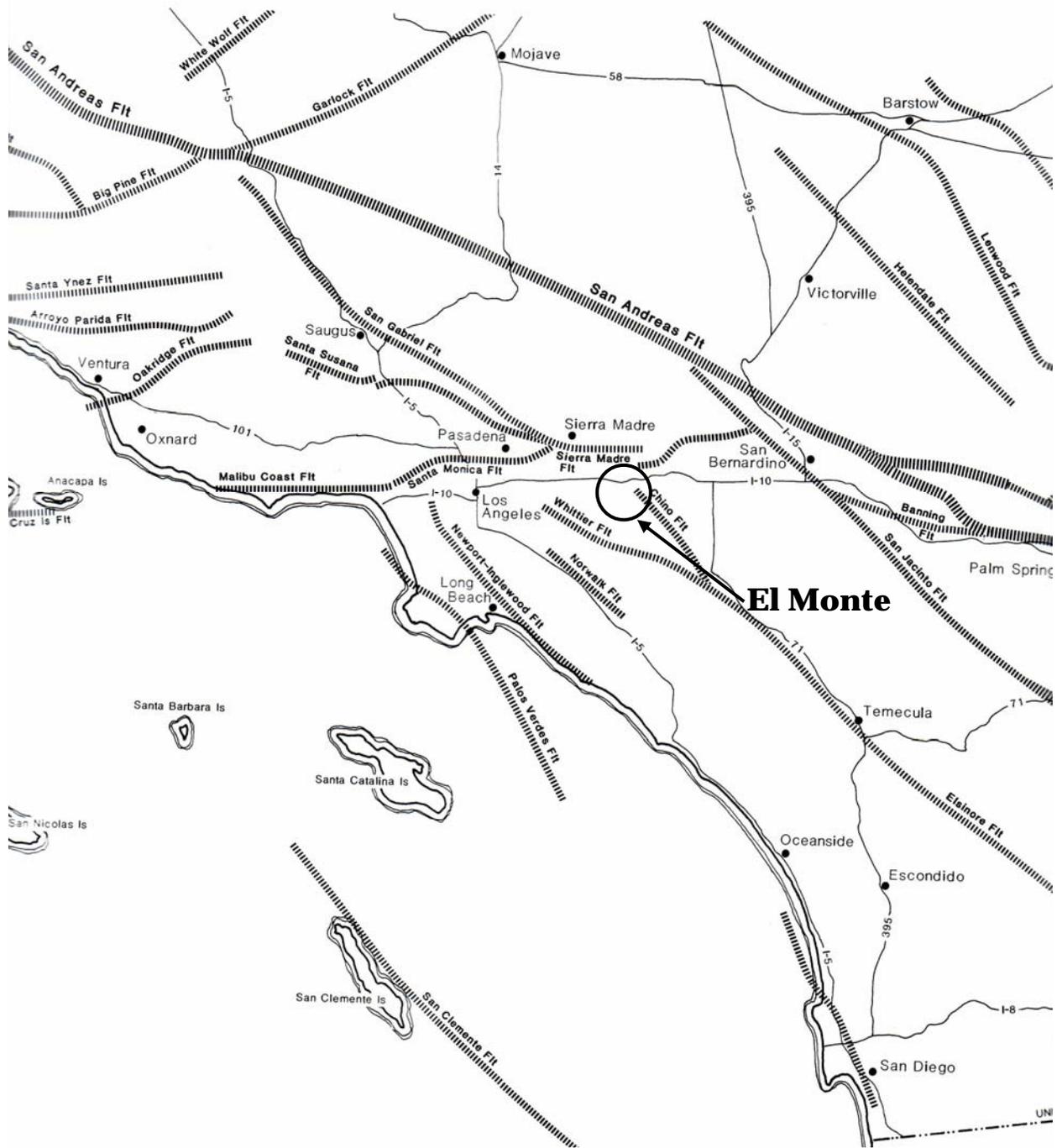
The Puente Hills Blind Thrust Fault is located just south of the City. This fault produced the 5.9 magnitude Whittier Narrows earthquake. The Puente Hills Fault was discovered in 1999. A 2003 study led by the Southern California Earthquake Center (SCEC) researchers found that this fault had ruptured at least four times in the last 11,000 years, with magnitudes ranging from 7.2 to 7.5. This fault is a blind thrust fault that extends from the Puente Hills into downtown Los Angeles. This blind thrust fault is located deep below the ground surface and, as a result, no surface expression from previous earthquakes is visible. An earthquake associated with the Puente Hills Fault would potentially generate strong ground-shaking in the project area. Ground-shaking is the motion felt on the Earth's surface caused by seismic waves generated by the earthquakes, with the damage from ground-shaking being more severe near the epicenter of the earthquake. In order to combat the potential effects of ground-shaking, new structures would be constructed to meet the current building codes and, as a result, the impacts would be less than significant.

Recent studies have been completed by the California Geological Survey (CGS) Seismic Hazard Zones Mapping Program. According to the Seismic Hazard Evaluations of the El Monte 7.5 Minute Quadrangle prepared by the CGS, the project site is located within a potential liquefaction hazard zone (refer to Exhibit 3-6). As a result, the project site would continue to be exposed to potential liquefaction and ground-shaking in the event of an earthquake.

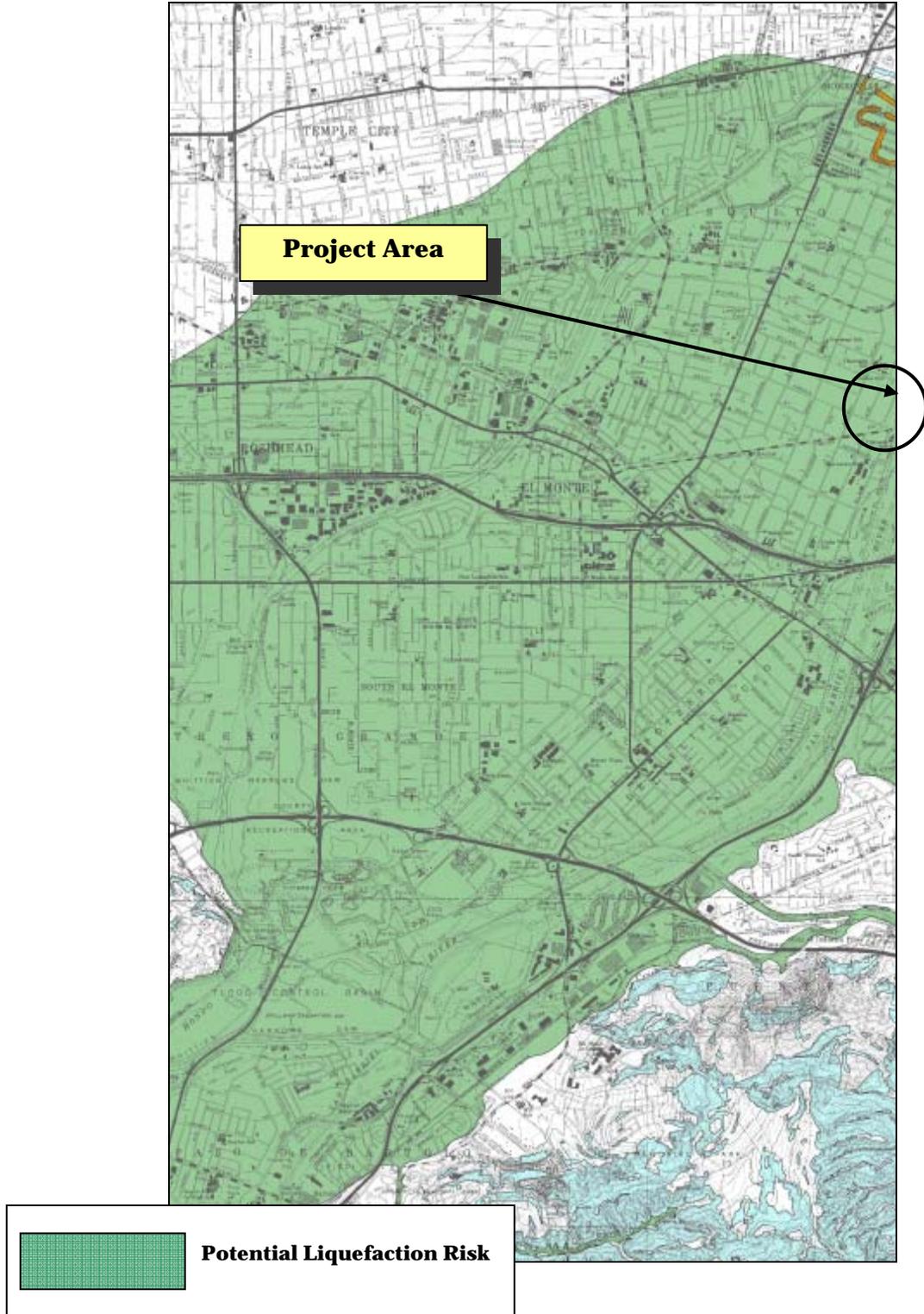
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<sup>51</sup> United States Geological Survey, *Evaluating Earthquake Hazards in the Los Angeles Region-An Earth Science Perspective (USGS Professional Paper 1360)*, 1981.

<sup>52</sup> *Ibid.*



**EXHIBIT 3-5**  
**REGIONAL FAULT MAP**  
Source: United States Geological Survey



### EXHIBIT 3-6 LIQUEFACTION POTENTIAL

Source: California Geological Survey

Local jurisdictions are required by California law to implement the Seismic Hazard Mapping Act, which requires that sites within "Zones of Required Investigation" be investigated for liquefaction before structures for human occupancy are constructed. In addition, adherence to the most recent City and state building codes governing seismic safety and structural design as well as the performance standards outlined in the Seismic Hazard Mapping Act would reduce the potential impacts to levels that are less than significant.

The following mitigation has been included and was taken from the Seismic Hazards Mapping Sheet provided on the California Department of Conservation website:

- The proposed project will need to undergo a liquefaction study since the proposed project site is located in an area that is subject to liquefaction.

*B. Would the project expose people or structures to potential substantial adverse effects, including substantial soil erosion or the loss of topsoil? Less than Significant Impact.*

The City is relatively level though project site slopes downwards towards the San Gabriel River. There is an existing retaining wall located in the northern portion of the site. The new retaining walls that will be constructed along the north side will range in height from 6 feet to 10 feet. The new retaining walls constructed along the west side will have a height of 6-feet. Lastly, the retaining walls that will be constructed along the southern boundary of the northern portion of the site will also have an average height of 6-feet. There will be a need to import soil to fill in the eastern sloping portion of the project site. In addition, a new retaining wall will need to be constructed along a portion of the site's west side. Mitigation measures included in Section 3.9 will effectively mitigate potential water runoff impacts during construction. A system of storm drains/channels will be constructed as a means to control storm water runoff. As a result, the impacts are expected to be less than significant.

*C. Would the project expose people or structures to potential substantial adverse effects, including location on a geologic unit or a soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? Less than Significant Impact.*

The United States Department of Agriculture Soil Conservation Service Report and General Soil Map for Los Angeles County was reviewed for this project. According the U.S. Department of Agriculture Soils Map, the project site is underlain by the Tujunga-Soboba Soils Association. The Tujunga-Soboba Association Soils are used almost exclusively for residential and industrial purposes.<sup>53</sup>

Tujunga-Soboba soils pose a slight erosion risk; moreover, the project site is located within an area subject to potential liquefaction (refer to Exhibit 3-6). However, the entire City is located within a potential liquefaction zone and adherence to the most recent building codes will reduce potential liquefaction impacts to levels that are less than significant. In addition, adherence to the mitigation provided in

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<sup>53</sup> United States Department of Agriculture Soil Conservation Service. Report and General Soil Map, Los Angeles County, California. Revised 1969.

subsection 3.6.2.A regarding the need for a liquefaction survey once the building and construction plans have been finalized will reduce potential impacts to levels that are less than significant.

The soils that underlie the project site pose no threat to development; in addition, the project site will be level once the project is complete. Therefore, the proposed project will not expose any person or structure to risks associated with soil collapse, landslides, or soil expansion. As a result, the potential adverse impacts are less than significant.

*D. Would the project result in or expose people to potential impacts, including location on expansive soil, as defined in Uniform Building Code (2012) creating substantial risks to life or property? No Impact.*

The project site is partially developed with obsolete structures (non-residential) on part of the property.<sup>54</sup> The existing improvements that occupy the property would be demolished to accommodate the new residential units. As indicated previously, the underlying soils consist of recent alluvial sediments. The soils are suitable for development as is evident from observing land uses and development in the area. In addition, all new structural improvements would be required to comply with the most current California Building Code requirements. As a result, no impacts related to expansive soils are anticipated.

*E. Would the project result in or expose people to potential impacts, including soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? No Impact.*

No septic tanks would be used as part of the future development. The applicant will also be required to install a sewer pump station to convey effluent from the individual units to the sewer main located in Bannister Avenue. This new infrastructure is discussed herein in Section 3.17. As stated previously, the soils that underlie the project site will support residential development. As a result, no impacts associated with the use of septic tanks would occur as part of the proposed project's implementation.

### **3.6.3 CUMULATIVE IMPACTS**

The potential cumulative impacts related to earth and geology is site specific. Since the proposed project is located in an area that is subject to liquefaction, mitigation measures have been provided to mitigate potential impacts to levels that are less than significant.

### **3.6.4 MITIGATION MEASURES**

The analysis indicated that the proposed project is located in an area of potential liquefaction. As a result, the following mitigation is required:

*Mitigation Measure No. 11 (Geology and Soils).* The proposed project will need to undergo a liquefaction study since the proposed project site is located in an area that is subject to liquefaction.

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<sup>54</sup> Blodgett/Baylosis Environmental Planning. Field Survey (site visit was conducted on August 14, 2014).

### 3.7 GREENHOUSE GAS EMISSIONS IMPACTS

#### 3.7.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, a project may be deemed to have a significant adverse impact on greenhouse gas emissions if it results in any of the following:

- The generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and,
- The potential for conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gasses.

#### 3.7.2 ENVIRONMENTAL ANALYSIS

A. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? Less than Significant Impact.*

Greenhouse gas (GHG) emissions are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O).<sup>55</sup> Table 3-5 summarizes annual greenhouse gas emissions from build-out of the proposed project. To assist lead agencies in determining significance for GHG emissions in their CEQA documents, the SCAQMD staff convened a GHG CEQA Significance Threshold Working Group. In 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency. The board letter, resolution, interim GHG significance threshold, draft guidance document and attachments can be found under the Board Agenda Item 31 on the December 5, 2008, Governing Board meeting agenda. In general, the only quantitative threshold developed thus far is 10,000 metric tons of GHG per year.

Table 3-5 summarizes annual greenhouse gas emissions from build-out of the proposed project. As indicated in Table 3-5, the GHG (CO<sub>2</sub>E) total for the project is 3,128 pounds per day or 517 metric tons per year, which is well below the threshold.

**Table 3-5  
 Greenhouse Gas Emissions Inventory**

Source	GHG Emissions (Lbs/Day)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> E
<b>Construction Phase</b> - Demolition	2509.05	0.63	0.00	2,522.41
<b>Construction Phase</b> - Site Preparation	2,508.19	2.74	0.00	2,523.92
<b>Construction Phase</b> - Grading	2,1640.10	0.64	0.00	2,177.66

<sup>55</sup> California, State of. OPR Technical Advisory – CEQA and Climate Change: Addressing Climate Change through the California Environmental Quality Act (CEQA) Review. June 19, 2008.

**Table 3-5  
 Greenhouse Gas Emissions Inventory (continued)**

Source	GHG Emissions (Lbs/Day)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> E
<b>Construction Phase</b> - Construction	2,364.07	0.56	0.00	2,375.97
<b>Construction Phase</b> - Paving	1,823.27	0.53	0.00	1,834.50
<b>Construction Phase</b> - Coatings	281.44	0.03	0.00	282.21
<b>Long-Term</b> – Area Emissions	632.85	0.64	0.01	650.95
<b>Long-Term</b> - Energy Emissions	220.92	--	--	222.27
<b>Long-Term</b> - Mobile Emissions	2,253.62	0.09	0.00	2,255.58
<b>Long-Term</b> - Total Emissions	3,107.40	0.74	0.01	3,128.80

Source: CalEEMod.

*B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gasses? Less than Significant Impact.*

The proposed project would be consistent with the California Environmental Protection Agency Climate Action Team’s proposed early action measures to mitigate climate change. These early action measures are designed to ensure that projects meet the Governor's climate reduction targets, and are documented in the *Climate Action Team Report to Governor Schwarzenegger at the Legislature*, March 2006. The early action measures are also included in the California Air Resources Board (CARB) Scoping Plan and are mandated under AB-32.

A complete list of CARB Scoping Plan Measures/Recommended Actions needed to obtain AB-32 goals, as well as the Governor's Executive Order, is provided Table 3-6 (shown on the following page). Table 3-6 also identifies which CARB *Recommended Actions* apply to the proposed project, and of those, whether the proposed project is consistent.

**Table 3-6  
 Recommended Actions for Climate Change**

ID #	Sector	Strategy Name	Applicable to Project?	Will Project Conflict With Implementation?
T-1	Transportation	Pavley I and II – Light-Duty Vehicle GHG Standards	No	No
T-2	Transportation	Low Carbon Fuel Standard (Discrete Early Action)	No	No
T-3	Transportation	Regional Transportation-Related GHG Targets	No	No
T-4	Transportation	Vehicle Efficiency Measures	No	No
T-5	Transportation	Ship Electrification at Ports (Discrete Early Action)	No	No

**Table 3-6  
 Recommended Actions for Climate Change (continued)**

<b>ID #</b>	<b>Sector</b>	<b>Strategy Name</b>	<b>Applicable to Project?</b>	<b>Will Project Conflict With Implementation?</b>
T-6	Transportation	Goods-movement Efficiency Measures	No	No
T-7	Transportation	Heavy Duty Vehicle Greenhouse Gas Emission Reduction Measure	No	No
T-8	Transportation	Medium and Heavy-Duty Vehicle Hybridization	No	No
T-9	Transportation	High Speed Rail	No	No
E-1	Electricity and Natural Gas	Increased Utility Energy efficiency programs More stringent Building and Appliance Standards	<b>Yes</b>	No
E-2	Electricity and Natural Gas	Increase Combined Heat and Power Use by 30,000 GWh	No	No
E-3	Electricity and Natural Gas	Renewable Portfolio Standard	No	No
E-4	Electricity and Natural Gas	Million Solar Roofs	No	No
CR-1	Electricity and Natural Gas	Energy Efficiency	<b>Yes</b>	No
CR-2	Electricity and Natural Gas	Solar Water Heating	No	No
W-4	Water	Reuse Urban Runoff	No	No
W-5	Water	Increase Renewable Energy Production	No	No
W-6	Water	Public Goods Charge (Water)	No	No
I-1	Industry	Energy Efficiency and Co-benefits Audits for Large Industrial Sources	No	No
I-2	Industry	Oil and Gas Extraction GHG Emission Reduction	No	No
I-3	Industry	GHG Leak Reduction from Oil and Gas Transmission	No	No
I-4	Industry	Refinery Flare Recovery Process Improvements	No	No
I-5	Industry	Removal of Methane Exemption from Existing Refinery Regulations	No	No
RW-1	Recycling and Waste Management	Landfill Methane Control (Discrete Early Action)	No	No
RW-2	Recycling and Waste Management	Additional Reductions in Landfill Methane – Capture Improvements	No	No
RW-3	Recycling and Waste Management	High Recycling/Zero Waste	No	No
F-1	Forestry	Sustainable Forest Target	No	No
H-1	High Global Warming Potential Gases	Motor Vehicle Air Conditioning Systems (Discrete Early Action)	No	No
H-2	High Global Warming Potential Gases	SF6 Limits in Non-Utility and Non-Semiconductor Applications (Discrete Early Action)	No	No
H-3	High Global Warming Potential Gases	Reduction in Perfluorocarbons in Semiconductor Manufacturing (Discrete Early Action)	No	No
H-4	High Global Warming Potential Gases	Limit High GWP Use in Consumer Products (Discrete Early Action, Adopted June 2008)	No	No

**Table 3-6  
 Recommended Actions for Climate Change (continued)**

<b>ID #</b>	<b>Sector</b>	<b>Strategy Name</b>	<b>Applicable to Project?</b>	<b>Will Project Conflict With Implementation?</b>
H-5	High Global Warming Potential Gases	High GWP Reductions from Mobile Sources	No	No
H-6	High Global Warming Potential Gases	High GWP Reductions from Stationary Sources	No	No
H-7	High Global Warming Potential Gases	Mitigation Fee on High GWP Gases	No	No
A-1	Agriculture	Methane Capture at Large Dairies	No	No

Source: California Air Resources Board, *Assembly Bill 32 Scoping Plan*, 2008.

Of the 39 measures identified to reduce GHG emissions, a total of two would be applicable to the proposed project. Those that would be considered to be applicable to the proposed project include actions related to electricity and natural gas use. The proposed project will be constructed to reduce its carbon footprint in regards to energy consumption and efficiency. AB-32 requires California to reduce its GHG emissions by approximately 28 to 33 percent below business as usual. Potential indirect GHG emissions could also be generated by incremental electricity consumption and waste generation. The proposed project would not conflict with adopted initiatives that are designed to control GHG emissions in the coming years. As a result, the proposed project is not expected to result in any significant impacts related to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gasses.

### **3.7.3 CUMULATIVE IMPACTS**

The analysis herein determined that the implementation of the proposed project would not result in any significant adverse impacts related to the emissions of greenhouse gasses. As a result, no significant adverse cumulative impacts would result from the proposed project's implementation.

### **3.7.4 MITIGATION MEASURES**

The analysis of potential impacts related to greenhouse gas emissions indicated that no significant adverse impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

## **3.8 HAZARDS & HAZARDOUS MATERIALS IMPACTS**

### **3.8.1 THRESHOLDS OF SIGNIFICANCE**

According to the City of El Monte, a project may be deemed to have a significant adverse impact on risk of upset and human health if it results in any of the following:

- The creation of a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials;
- The creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- The generation of hazardous emissions or the handling of hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school;
- Locating the project on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 resulting in a significant hazard to the public or the environment;
- Locating the project within an area governed by an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport;
- Locating the project in the vicinity of a private airstrip that would result in a safety hazard for people residing or working in the project area;
- The impairment of the implementation of, or physical interference with, an adopted emergency response plan or emergency evacuation plan; or,
- The exposure of people or structures to a significant risk of loss, injury or death involving wild land fire, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands.

### **3.8.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

A. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? Less than Significant Impact with Mitigation.*

In addition, a Phase I Site Assessment was completed for the site by Athanor Environmental Services, Inc. (November 5, 2014). The Phase I indicated there was no obvious asbestos or lead-based paint contamination present on the project site. The Phase I study also included a review of State and Federal agency listings and this review indicated that none of the adjacent properties appear on any agency listing of contaminated sites. The project site was not identified by any regulatory agency as having known hazardous materials spills, releases or environmental-related violations. The Phase I assessment indicated that there is no evidence of a recognized environmental condition in connection with the project site.

Comments received during the public review period indicated that there was a potential for arsenic contamination within the project site. The Phase I environmental site assessment prepared for the project site did not identify arsenic from the school site as a concern. The project team contacted the Department of Toxic Substances Control (DTSC) to ascertain whether the existence of this potential contamination can be confirmed. The site that was subject to the contamination was historically used as a gas station, an auto repair shop, and as a rail line. This area was previously a paved parking lot located at the Valle Lindo High School. The earlier site investigation detected elevated levels of arsenic. The DTSC developed a draft Removal Action Workplan (RAW) for the school site. This RAW addressed the removal and off-site disposal of contaminated soil at the school. The subsequent removal action resulted in the removal of approximately 940 tons of impacted soil and two remnant underground storage tanks.

The proposed project's implementation will also involve the demolition of existing obsolete structures to allow for the construction of 23 single-family homes. During the development phases, lead and/or asbestos-containing materials associated with the existing structures that will be demolished may be encountered.

Mitigation has been recommended in Section 3.8.2.C as a means to mitigate potential impacts from asbestos-containing materials and lead-based paint that may be encountered during demolition and/or grading (refer to discussion included herein in Section 3.8.2.C). The mitigation referred to in that section would further reduce the potential impacts to levels that are already less than significant.

*B. Would the project create a significant hazard to the public or the environment, or result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? Less than Significant Impact.*

Due to the residential nature of the proposed project, the use of any hazardous materials will be limited to those that are commercially available and typically used in a household setting. As a result, no significant adverse impacts concerning a release of hazardous materials are anticipated. Future on-site demolition and construction activities must comply with the mitigation measure outlined in Section 3.8.2.C. As a result, the potential impacts will be less than significant.

*C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? Less than Significant Impact with Mitigation.*

The proposed project's implementation would involve the demolition of obsolete existing structures to allow for the construction of the new residential units. During these activities, lead and/or asbestos-containing materials may be encountered. As a result, the following mitigation is required.

- The Applicant, and the contractors, must adhere to all requirements governing the handling, removal, and disposal of asbestos-containing materials, lead paint, underground septic tanks, and other hazardous substances and materials that may be encountered during demolition and land clearance activities. Any contamination encountered during the demolition, grading, and/or site preparation activities must also be removed and disposed of in accordance with applicable laws prior to the issuance of any building permit.

The mitigation measures outlined in Section 3.9 (Hydrology and Water Quality) will ensure that construction activities do not lead to any contamination of surface water runoff. The aforementioned mitigation would reduce the potential impact to levels that are considered to be less than significant.

*D. Would the project be located on a site, which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, and, as a result, would it create a significant hazard to the public or the environment? No Impact.*

The proposed project site is not included on a hazardous sites list compiled pursuant to Government Code Section 65962.5. One Cortese site is located in the City of El Monte; the San Gabriel Underground Water Basin.<sup>56</sup> This contamination is currently undergoing remediation. The project site is not included on the Cortese List. As a result, no impacts would occur with respect to locating a potential development on a site included on a hazardous list pursuant to the Government Code.

*E. Would the project be located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area? No Impact.*

The project site is located within two miles of an operational public airport. El Monte Airport is located approximately 1.8 miles to the west and is owned by the County of Los Angeles. The Long Beach Airport is located approximately 19.9 miles to the southwest. Finally, the Los Angeles International Airport (LAX) is located approximately 25.0 miles to the west.<sup>57</sup> The project site is not located under the approach or take-off zones of the airport. As a result, the proposed project's implementation would not present a safety hazard to aircraft and/or airport operations at a public use airport.

*F. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? No Impact.*

The City of El Monte is not located within two miles of an operational private airport or airstrip.<sup>58</sup> As a result, the proposed project would not present a safety hazard related to aircraft and/or airport operations at a private use airstrip.

*G. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? No Impact.*

At no time would any designated emergency evacuation routes be closed to vehicular traffic as a result of the proposed project's implementation. The project contractors would be required to submit a construction and staging plan to the City for approval. Thus, no impacts on emergency response or evacuation plans would result from the project's construction.

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<sup>56</sup> California, State of, Department of Toxic Substances Control, *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*, 2009.

<sup>57</sup> United States Geological Survey. TerraServer USA. *The National Map – El Monte, California*. July 1, 1979.

<sup>58</sup> Google Maps. 2014.

H. *Would the project expose people or structures to a significant risk of loss, injury or death involving wild lands fire, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands? No Impact.*

The entire City is urbanized and the parcels found within the affected area are partially developed but currently with obsolete non-residential structures.<sup>59</sup> There are no areas of *native* vegetation found within or immediately adjacent to the project site. As a result, there is no wildfire risk from the project site or the adjacent properties.

### **3.8.3 CUMULATIVE IMPACTS**

The potential impact related to hazardous materials is site specific. Furthermore, the analysis herein also determined that the implementation of the proposed project would not result in any significant unmitigable impacts related to hazards and/or hazardous materials. As a result, no significant adverse cumulative impacts would result from the proposed project's implementation.

### **3.8.4 MITIGATION MEASURES**

The environmental analysis determined that there may be a potential for hazardous materials to be encountered during the demolition and land clearance phases of development. As a result the following mitigation measure is required:

*Mitigation Measure No. 12 (Hazardous Materials Impacts).* The Applicant, and the contractors, must adhere to all requirements governing the handling, removal, and disposal of asbestos-containing materials, lead paint, underground septic tanks, and other hazardous substances and materials that may be encountered during demolition and land clearance activities. Any contamination encountered during the demolition, grading, and/or site preparation activities must also be removed and disposed of in accordance with applicable laws prior to the issuance of the building permit.

The aforementioned measure would reduce the potential hazardous materials impacts to levels that are less than significant.

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<sup>59</sup> Google Maps. 2014.

## **3.9 HYDROLOGY & WATER QUALITY IMPACTS**

### **3.9.1 THRESHOLDS OF SIGNIFICANCE**

According to the City of El Monte, a project may be deemed to have a significant adverse environmental impact on water resources or water quality if it results in any of the following:

- A violation of any water quality standards or waste discharge requirements;
- A substantial depletion of groundwater supplies or interference with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level;
- A substantial alteration of the existing drainage pattern of the site or area through the alteration of the course of a stream or river in a manner that would result in substantial erosion or siltation on- or off-site;
- A substantial alteration of the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in flooding on- or off-site;
- The creation or contribution of water runoff that would exceed the capacity of existing or planned storm water drainage systems or the generation of substantial additional sources of polluted runoff;
- The substantial degradation of water quality;
- The placement of housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map;
- The placement of structures within 100-year flood hazard areas that would impede or redirect flood flows;
- The exposure of people or structures to a significant risk of flooding as a result of dam or levee failure;
- The exposure of a project to inundation by seiche, tsunami or mudflow.

### **3.9.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

*A. Would the project violate any water quality standards or waste discharge requirements? Less than Significant Impact with Mitigation.*

Groundwater contamination has been a long-standing issue for the San Gabriel Valley. This contamination of the local aquifer within the San Gabriel Valley originated with the dumping of synthetic

organic compounds used primarily as solvents in industrial and commercial activities. The seriousness of the groundwater contamination problem became evident when high concentrations of volatile organic compounds (“VOCs”) were discovered in Azusa in 1979 near a major industrial complex. Further investigation revealed that there was widespread VOC contamination of the groundwater throughout the Basin. This discovery led the EPA to place four portions of the Basin under the authority of Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), also known as the Superfund program. The area of groundwater contamination underlies significant portions of Alhambra, Arcadia, Azusa, Baldwin Park, Industry, El Monte, La Puente, Monrovia, Rosemead, South El Monte, West Covina, and other areas of the San Gabriel Valley.<sup>60</sup>

The EPA and a number of local agencies have been conducting the clean-up of this contaminated groundwater by pumping groundwater from a series of wells and treating the water. To augment the EPA’s effort, cities and municipal water districts within the San Gabriel Valley Superfund area established the San Gabriel Water Quality Authority in 1993 to assist in this clean-up effort. Six active Operable Units (OUs) have been established to facilitate clean-up efforts. Portions of southwestern El Monte overlie the El Monte OU. Water from wells located within the OUs is treated and/or blended with higher quality water to meet drinking water standards before entering public water supply distribution systems.<sup>61</sup> The proposed project will not impact this ongoing remediation effort. The proposed project involves the demolition of existing obsolete structures that would allow for the construction of 23 single-family homes. In the absence of mitigation, the new impervious surfaces (buildings, internal driveways, parking areas, etc.) that would be constructed may result in debris, leaves, soils, oil/grease, and other pollutants.<sup>62</sup> The proposed project would be required to implement storm water pollution control measures pursuant to the National Pollutant Discharge Elimination System (NPDES) requirements. The Applicant would also be required to prepare a Water Quality Management Plan (WQMP) utilizing Best Management Practices to control or reduce the discharge of pollutants to the maximum extent practicable. The WQMP will also identify post-construction best management practices (BMPs) that will be the responsibility of the homeowners association to implement over the life of the project. In addition, the following mitigation is required as part of this project to ensure that potential water quality impacts are mitigated:

- Prior to issuance of any grading permit for the project that would result in soil disturbance of one or more acres of land, the Applicant shall demonstrate that coverage has been obtained under California’s General Permit for Stormwater Discharges Associated with Construction Activity by providing a copy of the Notice of Intent (NOI) submitted to the State Water Resources Control Board and a copy of the subsequent notification of the issuance of a Waste Discharge Identification (WDID) Number or other proof of filing shall be provided to the Chief Building Official and the City Engineer.
- The Applicant shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall be submitted to the Chief Building Official and City Engineer prior to the

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<sup>60</sup> City of El Monte (and Planning Center). *General Plan and Zoning Code Update and EIR Existing Conditions Report*. May 24, 2006.

<sup>61</sup> Ibid.

<sup>62</sup> Blodgett/Baylosis Environmental Planning. *Site Survey*. August 14, 2014.

issuance of a grading permit. The Applicant shall register their SWPPP with the State of California. A copy of the current SWPPP shall be kept at the project sites and be available for review on request.

With the aforementioned mitigation, the impacts would be less than significant.

*B. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge in such a way that would cause a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of a pre-existing nearby well would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? No Impact.*

The City of El Monte overlies a portion of the 225-square mile San Gabriel Valley [groundwater] Basin that encompasses most of eastern Los Angeles County. This hydrologic basin coincides with a portion of the upper San Gabriel River watershed and the groundwater basin underlies most of the San Gabriel Valley. The groundwater basin is bounded by the San Gabriel Mountains to the north, San Jose Hills to the east, Puente Hills to the south, and by a series of hills and the Raymond Fault to the west.<sup>63</sup> The proposed project will not substantially deplete ground-water supplies. The 23 units will consume approximately 7,475 gallons of water daily. The proposed project will also conform to the City's water conservation requirements.<sup>64</sup> Projected water consumption is discussed further in Section 3.17.D. The proposed project's implementation would not involve any excavation that would affect a local aquifer. In addition, the proposed project would not affect any existing water well. As a result, no impacts are anticipated.

*C. Would the project substantially alter the existing drainage pattern of the site or area, including 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? No Impact.*

The San Gabriel Valley is located in southeastern Los Angeles County and is bounded on the north by the San Gabriel Mountains; on the west by the San Rafael and Merced Hills, on the south by the Puente Hills and the San Jose Hills, and on the east by a low divide between the San Gabriel River system and the Upper Santa Ana River system.<sup>65</sup> The San Gabriel River and its tributary, the Rio Hondo, drain an area of about 490 square miles upstream of Whittier Narrows. Whittier Narrows is a low gap between the Merced and Puente Hills, just northwest of the City of Whittier, through which the San Gabriel River and Rio Hondo flow to the coastal plain of Los Angeles. Whittier Narrows is a natural topographic divide and a subsurface restriction to the movement of groundwater between the Main San Gabriel Basin and the Coastal Plain. Of the approximately 490 square miles of drainage area upstream of Whittier Narrows, about 167 square miles are valley lands and about 323 square miles are mountains and foothills.<sup>66</sup>

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<sup>63</sup> City of El Monte (and Planning Center). *General Plan and Zoning Code Update and EIR Existing Conditions Report*. May 24, 2006.

<sup>64</sup> City of El Monte. *Water Districts Map*. <http://www.ci.el-monte.ca.us/LinkClick.aspx?fileticket=fBMHsD1Mn-Q%3d&tabid=605>

<sup>65</sup> United States Geological Survey. TerraServer USA. The National Map. El Monte, California. July 1, 1979.

<sup>66</sup> City of El Monte, 2010 Urban Water Management Plan.

The project would not affect or alter any existing drainage pattern of a stream or river. The highest elevation within the site is 317 feet above mean sea level (AMSL), while the lowest point on the site is 310 feet AMSL. The highest point is in the site's northwest corner while the lowest point is in the site's southeast corner. The existing surface drainage for the entire site is generally from west to east. Pre-development, the peak runoff generated is estimated to be 5.66 cubic feet per second (CFS). Post-development, the peak runoff generated is estimated to be 5.78 CFS. When comparing the pre-project condition with the post-project condition, the net change will be 0.12 CFS, or 2%.<sup>67</sup> No changes to the San Gabriel River channel would occur as a result of the proposed project's implementation. The project will include a storm water treatment chamber on the eastern side of the project site within the new road. There will also be storm drains and drainage easements installed along the eastern part of the site. As a result, no impacts are anticipated.

*D. Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner, which would result in flooding on- or off-site? No Impact.*

As indicated in the previous section, the project site is partially developed and covered over with dirt and obsolete structures. The site slopes eastward towards the San Gabriel River channel. However, the implementation of the proposed planned residential development would establish a drainage system for storm water discharges as required by the City. As a result, the proposed project's implementation would not impact any designated blue-line stream, drainage course, or "Waters of the U. S." as indicated in the previous section, and the proposed development would not physically impact the San Gabriel River Channel. No other natural stream channels remain within the affected area. As a result, no impacts are anticipated.

*E. Would the project create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff? Less than Significant Impact with Mitigation.*

No surface water bodies are found within the project site.<sup>68</sup> The proposed project would not substantially alter the existing on-site drainage pattern. The project site largely consists of pervious surfaces. The proposed project will not significantly alter the existing drainage and percolation characteristics with the installation of impervious surfaces (buildings and roads). The existing surface drainage for the entire site is generally from west to east. Pre-development, the peak runoff generated is estimated to be 5.66 CFS. Post-development, the peak runoff generated is estimated to be 5.78 CFS. When comparing the pre-project condition with the post-project condition, the net change will be 0.12 CFS, or 2%.<sup>69</sup>

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<sup>67</sup> Land Development Consultants Drainage Study for Tract No. 72192 4422 & 4436 Bannister Avenue El Monte, CA County of Los Angeles. Dated September 19, 2014.

<sup>68</sup> City of El Monte, 2010 Urban Water Management Plan.

<sup>69</sup> Land Development Consultants Drainage Study for Tract No. 72192 4422 & 4436 Bannister Avenue El Monte, CA County of Los Angeles. Dated September 19, 2014.

Following development, surface runoff will be diverted to the storm water treatment chamber to facilitate percolation. In the absence of mitigation, the impervious surfaces (internal driveways, parking areas, etc.) that would be constructed as part of the site's development could lead to the presence of debris, leaves, soils, oil/grease, and other pollutants within the vicinity. The following measures are required as a means to address potential storm water impacts:

- All catch basins and public access points that cross or abut an open channel shall be marked by the Applicant with a water quality label in accordance with City standards. This measure must be completed and approved by the City Engineer prior to the issuance of a Certificate of Occupancy.
- The Applicant shall be responsible for the construction of all on-site drainage facilities as required by the City Engineer.

The aforementioned mitigation would reduce the potential impacts to levels that are less than significant.

*F. Would the project otherwise substantially degrade water quality? No Impact.*

The proposed project involves the demolition of obsolete structures to allow for the construction of the 23 new residential units. In the absence of mitigation, the impervious surfaces (internal driveways, parking areas, etc.) that would be constructed as part of the site's development could lead to the presence of debris, leaves, soils, oil/grease, and other pollutants within the parking areas.<sup>70</sup> Previous mitigation would address this issue. As a result, no impacts are anticipated.

*G. Would the project 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? Less than Significant Impact.*

According to the FEMA flood insurance map obtained from the Los Angeles County Department of Public Works, the proposed project site is located in Zone X (refer to Exhibit 3-7). Properties located in Zone X are not located within a 100-year flood plain.<sup>71</sup> Even though the proposed project is located within Zone X, the project site still abuts the San Gabriel River to the west. Communities must require that all new construction and substantial improvements of residential structures within Zones A1-30, AE and AH Zones on the community's Flood Insurance Rate Map (FIRM) have the lowest floor (including basement) elevated to or above the Base Flood Elevation (BFE). Common elevation techniques include elevation on pile, elevation on piles, piers or columns, and elevation on extended foundation walls such as on a crawl space.

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<sup>70</sup> Blodgett/Baylosis Environmental Planning. *Site Survey*. August 14, 2014.

<sup>71</sup> FEMA. *Flood Zones, Definition/Description*. <http://www.fema.gov/floodplain-management/flood-zones>



## EXHIBIT 3-7 FEMA FLOOD MAP

Source: Los Angeles County Department of Public Works and ESRI

The following requirements may be applicable if it is determined in subsequent phases of planning and design that certain flood protection measures are warranted.

- In areas designated as Zone A, the community must obtain, review, and reasonably utilize BFE data available from a Federal, State, or other source and use these data as criteria for requiring that new construction and substantial improvements of residential structures have the lowest floor (including basement) elevated to or above the BFE.
- All new construction and substantial improvement in Zones V1-30, VE, and also Zone V (if BFE data is available), must be elevated on pilings and columns so that the bottom of the lowest horizontal structural member of the lowest floor (excluding the pilings or columns) is elevated to or above the BFE.
- For residential structures in AO Zones, the lowest floor (including basement) must be elevated at least as high as the depth number specified in feet on the community's map, or at least two feet if no number is specified.

The proposed project must comply with all pertinent requirements for new construction of residential structures within the designated flood zone since the project site is adjacent to an existing flood control channel (the San Gabriel River Channel). Therefore, no significant flood-related impacts would occur.

*H. Would the project place within a 100-year flood hazard area, structures that would impede or redirect flood flows? Less than Significant Impact.*

As indicated in Exhibit 3-6, 3-7, the proposed project site is not located within a designated 100-year flood hazard area as defined by FEMA.<sup>72</sup> However as detailed in the next subsection the proposed project as well as the majority of the City is within the limits of the inundation area which is within the potential flood area due to dam failure with the water surface at a spillway crest elevation of 496 feet. As a result, the future development's impact is less than significant.

*I. Would the project expose people or structures to a significant risk of flooding as a result of dam or levee failure? Less than Significant Impact.*

Dam or reservoir inundation occurs when large volumes of water are released as the result of structural failure of a dam or reservoir. The project site is located adjacent to the San Gabriel River though, according to FEMA Flood Insurance Rate Maps, the project site is not anticipated to be subject to flooding from an overflow of the river channel. The City is protected from storm water flows and flooding by the San Gabriel River and Rio Hondo River, channelized waterways that convey the majority of floodwater downstream and away from properties. Although the City of El Monte does not have a dam or reservoir, the City and the project site are located within an area that would be subject to flows from a potential dam or levee failure. El Monte is located near two major dams and reservoirs: the Santa Fe Dam and Reservoir, located two miles northeast of the City and the Whittier Narrows Dam, located one mile southwest of the

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<sup>72</sup> Federal Emergency Management Agency. *Flood Insurance Rate Maps*. 2010 (as amended).

City. Both dams are owned and operated by the U.S. Army Corp of Engineers (USACE). The inundation map prepared for the Santa Fe Dam Emergency Plan indicates the majority of El Monte (except the northwestern-most corner) is located within the potential flood area due to dam failure with the water surface at a spillway crest elevation of 496 feet. At a distance of 2.3 miles from the dam (the approximate northern City boundary), water depth would increase 0.25 feet (arrival time) in 45 minutes and 2.5 hours in the southernmost portion of the City. Emergency response and evacuation plans for the affected areas have been established by the Los Angeles County Sheriff's Department and the USACE, to facilitate emergency operations in the event of dam failure or river overflow. In addition, the level of risk to future development within the project sites is comparable to that of the entire City. Therefore, the impacts related to flood flows are anticipated to be less than significant.

*J. Would the project result in inundation by seiche, tsunami, or mudflow? No Impact.*

The City of El Monte is located inland approximately 25 miles from the Pacific Ocean and the project area would not be exposed to the effects of a tsunami. No dams, reservoirs or volcanoes are located near the City that would present seiche or volcanic hazards. In addition, there are no surface water bodies in the immediate area of the proposed project site that would result in a potential seiche hazard.<sup>73</sup> As a result, no impacts related to seiche, tsunami, or mudflows would result from the implementation of the proposed project.

### **3.9.3 CUMULATIVE IMPACTS**

The potential impacts related to hydrology and storm water runoff are typically site specific. The implementation of the proposed project would not result in any significant adverse impacts related to hydrology. As indicated previously, the post-development, the peak runoff generated is estimated to be 5.78 CFS. When comparing the pre-project condition with the post-project condition, the net change will be 0.12 CFS, or 2%. As a result, storm water flows will be properly drained and will not have a significant impact on the San Gabriel River with adherence to the required mitigation measures. As a result, no cumulative impacts are anticipated.

### **3.9.4 MITIGATION MEASURES**

In addition, the following mitigation is required as part of this project to ensure that potential water quality impacts are mitigated:

*Mitigation Measure No. 13 (Hydrology and Water Quality Impacts).* Prior to issuance of any grading permit for the project that would result in soil disturbance of one or more acres of land, the Applicant shall demonstrate that coverage has been obtained under California's General Permit for Stormwater Discharges Associated with Construction Activity by providing a copy of the Notice of Intent (NOI) submitted to the State Water Resources Control Board and a copy of the subsequent notification of the issuance of a Waste Discharge Identification (WDID) Number or other proof of filing shall be provided to the Chief Building Official and the City Engineer.

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<sup>73</sup> United States Geological Survey. TerraServer USA. The National Map. El Monte, California. July 1, 1979.

*Mitigation Measure No. 14 (Hydrology and Water Quality Impacts).* The Applicant shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall be submitted to the Chief Building Official and City Engineer prior to the issuance of a grading permit. The Applicant shall register their SWPPP with the State of California. A copy of the current SWPPP shall be kept at the project site and be available for review on request.

The following measures are required as a means to address potential storm water impacts:

*Mitigation Measure No. 15 (Hydrology and Water Quality Impacts).* All catch basins and public access points that cross or abut an open storm drain shall be marked by the Applicant with a water quality label in accordance with City standards. This measure must be completed and approved by the City Engineer prior to the issuance of a Certificate of Occupancy.

*Mitigation Measure No. 16 (Hydrology and Water Quality Impacts).* The Applicant shall be responsible for the construction of all on-site drainage facilities as required by the City Engineer.

## 3.10 LAND USE IMPACTS

### 3.10.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, a project may be deemed to have a significant impact on land use and development if it results in any of the following:

- The disruption or division of the physical arrangement of an established community;
- A conflict with an applicable land use plan, policy or regulation of the agency with jurisdiction over the project; or
- A conflict with any applicable conservation plan or natural community conservation plan.

### 3.10.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project physically divide or disrupt an established community or otherwise result in an incompatible land use? Less than Significant Impact.*

The project site is located in an urban setting and is surrounded by urban development. Surrounding land uses and development in the vicinity of the project site include the following:

- The San Gabriel River and San Gabriel River Trail extends along the project site's east side in a north-south orientation. The San Gabriel River is channelized and is used for flood control.<sup>74</sup> The trail is paved and is atop a slope which consists of dirt, rocks, and loose gravel.
- Bannister Avenue abuts the project site to the west in north-south orientation.<sup>75</sup> The street is surrounded on all sides by single family housing. The south end of the street curves to the west and becomes Lambert Avenue, a street that traverses the City in an east-west orientation.
- Fernando R Ledesma High School occupies frontage along the north side of Ramona Boulevard. The High School also directly abuts the project site to the south. La Primaria Elementary School is located directly across Fernando R Ledesma High School on the south side of Ramona Boulevard.
- The south side of Ramona Boulevard to the west of the Elementary School features a mix of both residential development, and commercial uses including a carwash, 7-Eleven, Taco N Trento, Bagworld, and El Dorado Tires.<sup>76</sup> In addition, there is a preschool (Burdick's) located on the corner of Ramona Boulevard and Maxson Road, and two bus stops (Ramona/Gilman and Ramona/Maxson) in the vicinity of the project site.<sup>77</sup>

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<sup>74</sup> Blodgett/Baylosis Environmental Planning. Site Survey completed on August 14<sup>th</sup>, 2014.

<sup>75</sup> Google Earth.

<sup>76</sup> Site Survey completed on August 14, 2014.

<sup>77</sup> Blodgett/Baylosis Environmental Planning. Site Survey completed on August 14, 2014.

- Other notable uses in the area is Peck Road Water Conservation Park, located in both Arcadia and El Monte approximately 1.5 miles to the northwest of the proposed project.<sup>78</sup>

Land uses around the project site are shown in Exhibit 3-8. The proposed project site is an infill property that is surrounded on all sides by man-made improvements. As a result, the project's land use impacts are considered to be less than significant.

*B. Would the project conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to, a general plan, proposed project, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? Less than Significant Impact*

The project site is currently zoned as *R-1B (Low Density Residential)* and *PF (Public Facility)* and is one of few underutilized parcels in the City suitable for infill development. Single-family dwellings are permitted within the current R-1B zone. The southern and eastern portions of the project site are currently zoned for Public Facilities (schools and government buildings) and this area will require a Zone Map Amendment to R-1B to accommodate the proposed development. The existing public facilities designation reflects public school land that has since been sold for development. In addition, a General Plan Amendment (GPA) would be required to change the General Plan designations from Public Facilities to Low Density Residential in order to accommodate the planned residential development (refer to Exhibits 3-9 and 3-10 for General Plan and Zoning maps). The proposed project will also involve the approval of a Planned Residential Development (permitted under the R-3 zoning designation). Finally, the Applicant is requesting a density bonus that would permit two additional dwelling units. The proposed project is not regionally significant according to definitions provided by SCAG and the SCAQMD. In addition, the proposed project is not subject to an adopted specific plan. Finally, the project site is located inland and is not located within a designated Coastal Zone. As a result, the potential impacts are considered to be less than significant.

*C. Will the project conflict with any applicable habitat conservation plan or natural community conservation plan? No Impact.*

No natural open space areas are located within the proposed project site. The project site and the adjacent parcels are not included within areas that are subject to a habitat conservation plan or a local coastal plan (LCP). The proposed project site is located 3.9 miles to the north of the Whittier Narrows Nature Center and Wildlife Sanctuary, which in turn is located within the larger Whittier Narrows Dam County Recreation Area Significant Ecological Area (SEA) No. 42, as designated by the Los Angeles Department of Recreation and Parks (LADRP). The proposed project site is well located outside of the SEA boundaries.<sup>79</sup> As a result, no impacts on local, regional, or State habitat conservation plans would result from the implementation of the proposed project.

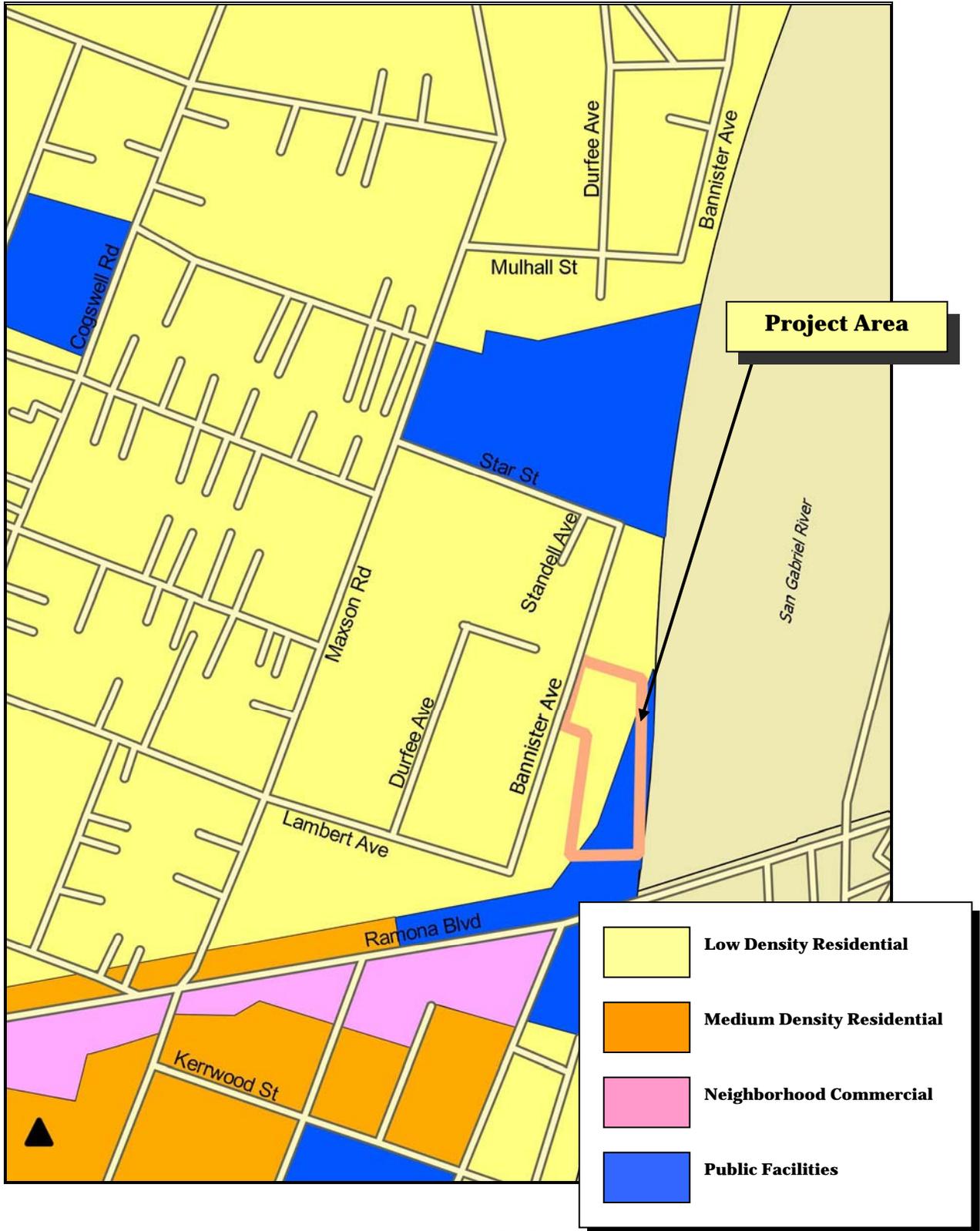
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<sup>78</sup> Blodgett/Baylosis Environmental Planning. Site Survey completed on August 14, 2014.

<sup>79</sup> Discovery Center Authority. *San Gabriel River Discovery Center Draft Environmental Impact Report*. June 2009.  
SECTION 3.10 • LAND USE IMPACTS

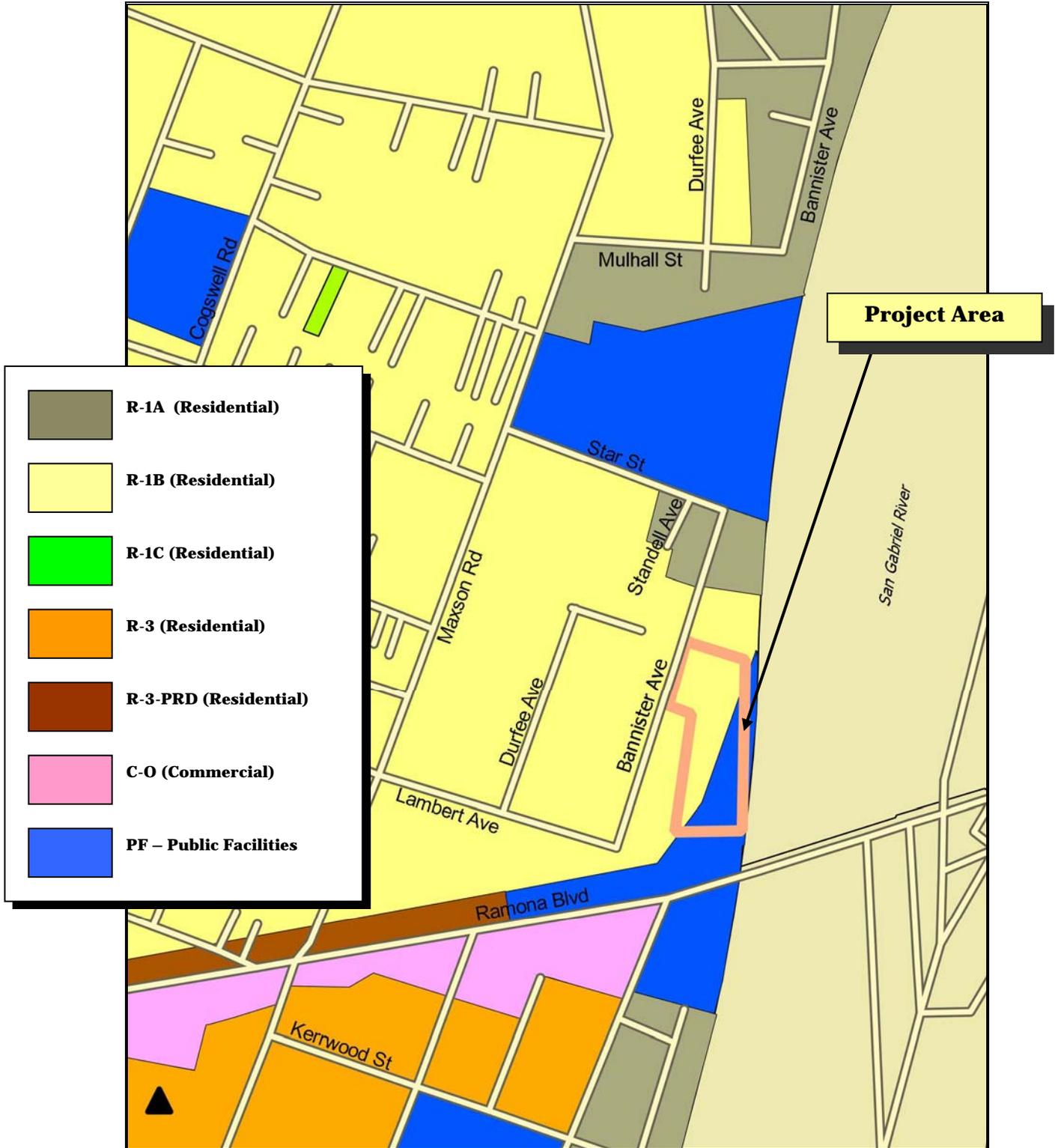


**EXHIBIT 3-8**  
**EXISTING LAND USES IN THE AREA**  
Source: Blodgett/Baylosis Environmental Planning



### EXHIBIT 3-9 EXISTING GENERAL PLAN DESIGNATIONS

Source: City of El Monte



**EXHIBIT 3-10**  
**EXISTING ZONING DESIGNATIONS**  
Source: City of El Monte

### **3.10.3 CUMULATIVE IMPACTS**

The analysis determined that the proposed project would not result in any significant adverse land use impacts. As a result, no significant cumulative land use impacts would occur.

### **3.10.4 MITIGATION MEASURES**

The analysis of land use and development impacts indicated that no significant impacts on land use and development would result from the implementation of the proposed project. As a result, no mitigation measures are required.

### 3.11 MINERAL RESOURCES IMPACTS

#### 3.11.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, a project may be deemed to have a significant adverse impact on energy and mineral resources if it results in any of the following:

- The loss of availability of a known mineral resource that would be of value to the region and the residents of the State; or
- The loss of availability of a locally important mineral resource recovery site delineated on a local general plan, proposed project, or other land use plan.

#### 3.11.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State? No Impact.*

There are no oil wells located within or near the proposed project site.<sup>80</sup> The California Geological Survey Mineral Resources Project provides information regarding mineral resources (metals, rare-earth elements, clays, limestone, gypsum, salt and dimension stone, and construction aggregate) and classifies lands throughout the State that contain regionally significant mineral resources. This classification is mandated by the Surface Mining and Reclamation Act (SMARA). The SMARA requires all cities to incorporate in their General Plans mapped designations approved by the State Mining and Geology Board.<sup>81</sup> The State Geologist classifies mineral resource areas into Mineral Resource Zones (MRZs), Scientific Resource Zones (SZ), or Identified Resource Areas (IRAs). The categories of mineral resource zones are as follows:

- *MRZ-1*: No significant mineral deposits are present or likely to be present;
- *MRZ-2*: Significant mineral deposits are present, or likely present;
- *MRZ-3*: Significance of mineral deposits cannot be determined from the available data;
- *MRZ-4*: Insufficient data to assign any other MRZ designation;
- *SZ*: Areas containing unique or rare occurrences of rocks, minerals or fossils; and,
- *IRA*: Areas where production and information indicates significant minerals are present.

The City of El Monte is located within the San Gabriel Production-Consumption Region. The northeastern portion of the City is identified as containing significant mineral deposits and is designated as a MRZ-2 zone. However, no County of Los Angeles-designated Mineral Resource Zones are located in El Monte. El Monte is completely urbanized and does not contain mining uses, nor does the City have land designated for mineral, aggregate or sand production.<sup>82</sup> The project site is not located within a SMARA nor is it

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<sup>80</sup> State of California Department of Conservation. *Regional Wildcat Map*. October 2011.

<sup>81</sup> City of El Monte (and Planning Center). *General Plan and Zoning Code Update and EIR Existing Conditions Report*. May 24, 2006.

<sup>82</sup> Ibid.

located in an area with active mineral extraction activities. As a result, no impacts on existing mineral resources would result from the proposed project's implementation.

*B. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, proposed project or other land use plan? No Impact.*

There are no mineral, oil or energy extraction and/or generation activities located within the project site. Review of maps provided by the State Department of Conservation indicates that there are no oil wells located within the project site or in the adjacent area.<sup>83</sup> As a result, the project's implementation would not include any materials that are considered rare or unique. Thus, the proposed project would not result in any effects on mineral resources in the region.

### **3.11.3 CUMULATIVE IMPACTS**

The potential impacts on mineral resources are site specific. Furthermore, the analysis determined that the implementation of the proposed project would not result in any impacts on mineral resources and no cumulative impacts would occur.

### **3.11.4 MITIGATION MEASURES**

The analysis of potential impacts related to mineral resources indicated that no impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

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<sup>83</sup> State of California Department of Conservation. *Regional Wildcat Map*. October 2011.

## 3.12 NOISE IMPACTS

### 3.12.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, a project may be deemed to have a significant impact on the environment if it results in any of the following:

- The exposure of persons to, or the generation of, noise levels in excess of standards established in the local general plan, noise ordinance or applicable standards of other agencies;
- The exposure of people to, or the generation of, excessive ground-borne noise levels;
- A substantial permanent increase in ambient noise levels in the vicinity of the project above levels existing without the project;
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- Locating within an area governed by an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or private use airport, where the project would expose people to excessive noise levels; or,
- Locating within the vicinity of a private airstrip that would result in the exposure of people residing or working in the project area to excessive noise levels.

### 3.12.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in exposure of persons to, or the generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? Less than Significant Impact with Mitigation.*

Noise levels may be described using a number of methods designed to evaluate the “loudness” of a particular noise. The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB is the ambient noise level that is considered to represent the threshold for human sensitivity. In other words, increases in ambient noise levels of 3.0 dB or less are not generally perceptible to persons with average hearing abilities. Noise levels that are associated with common, everyday activities are illustrated in Exhibit 3-11. The City of El Monte Municipal Code has established the following noise control standards for residential development:

- *Single-family Residential:* 50 dBA between 7 AM to 10 PM and 45 dBA between 10 PM to 7 AM;

City noise standards are not to be exceeded by 10 dBA for a cumulative period of 1 minute in any hour, or by 15 dBA for any period of time (less than one minute in an hour). The City also limits the use of power construction tools or equipment to between 6:00 AM and 7:00 PM on any working day, or 8:00 AM to

7:00 PM on weekends, unless performing emergency work.<sup>84</sup> Noise monitoring was conducted using a Sper Scientific digital sound level meter Model 840029. A total of sets of noise measurements were taken along the east side of Bannister Avenue, where the proposed project's property line had frontage. The measurements were taken at 11:45 AM on August 14<sup>th</sup>, 2014. The first set of measurements measured noise traveling from sources to the west (Bannister Avenue and the homes along the west side of Bannister Avenue), while the second set of measurements were taken measuring noise traveling from sources to the east (the 605 freeway, Baldwin Park, and San Gabriel River trail).

The average noise levels at the measurement location in front of the project site along Bannister Avenue facing west was 66.2 dBA. The average noise level for the second measurement located in the same area but facing east was 67.5 dBA.<sup>85</sup> The noise measurement results for the daytime are illustrated in Exhibit 3-12. As indicated in Section 3.16, the project would not result in a significant impact related to traffic noise since it typically requires a doubling of traffic volumes to register a perceptible change in noise levels. In addition, the proposed use would be required to comply with the City of El Monte Noise Control Ordinance. However, the project site is exposed to high levels of noise generated by the I-605 freeway. In order to protect the future residents from the generation of excess noise, the following mitigation has been recommended:

- The developer shall install double-paned windows in each unit that has a line of site of the I-605 Freeway and Bannister Avenue as a means to further reduce noise levels. The installation of thicker double-paned windows can reduce noise by up to 20% and well-designed vinyl frames can help reduce it by as much as 50%.
- Each dwelling unit shall be constructed with weather-stripped solid core exterior doors and exterior wall/roof assemblies insulated to further reduce interior ambient noise levels. This mitigation measure will reduce the noise levels by approximately 6 dB.

Observance of the above mitigation measures will reduce noise levels to those that are less than significant.

*B. Would the project result in exposure of people to, or the generation of, excessive ground-borne noise levels? Less than Significant Impact.*

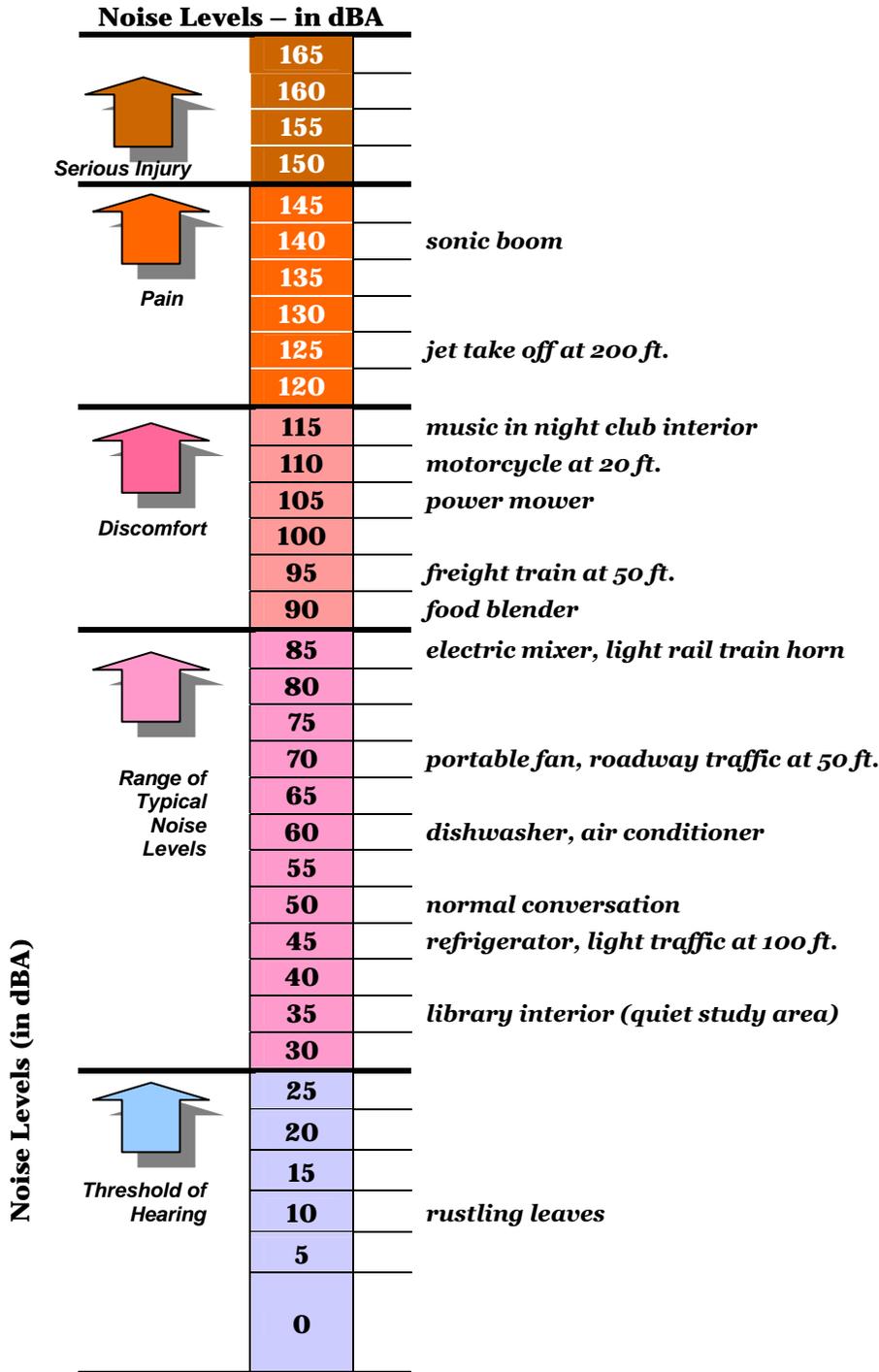
As indicated in Section 3.16, the project would result in an additional 40 vehicle trips during the busiest peak traffic periods.<sup>86</sup> This volume is under the range that would not represent a significant traffic noise impact. In addition, the proposed uses would be required to comply with the City of El Monte Noise Control Ordinance. As a result, the potential noise impacts are considered to be less than significant.

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<sup>84</sup> City of El Monte (and Planning Center). *General Plan and Zoning Code Update and EIR Existing Conditions Report*. May 24, 2006.

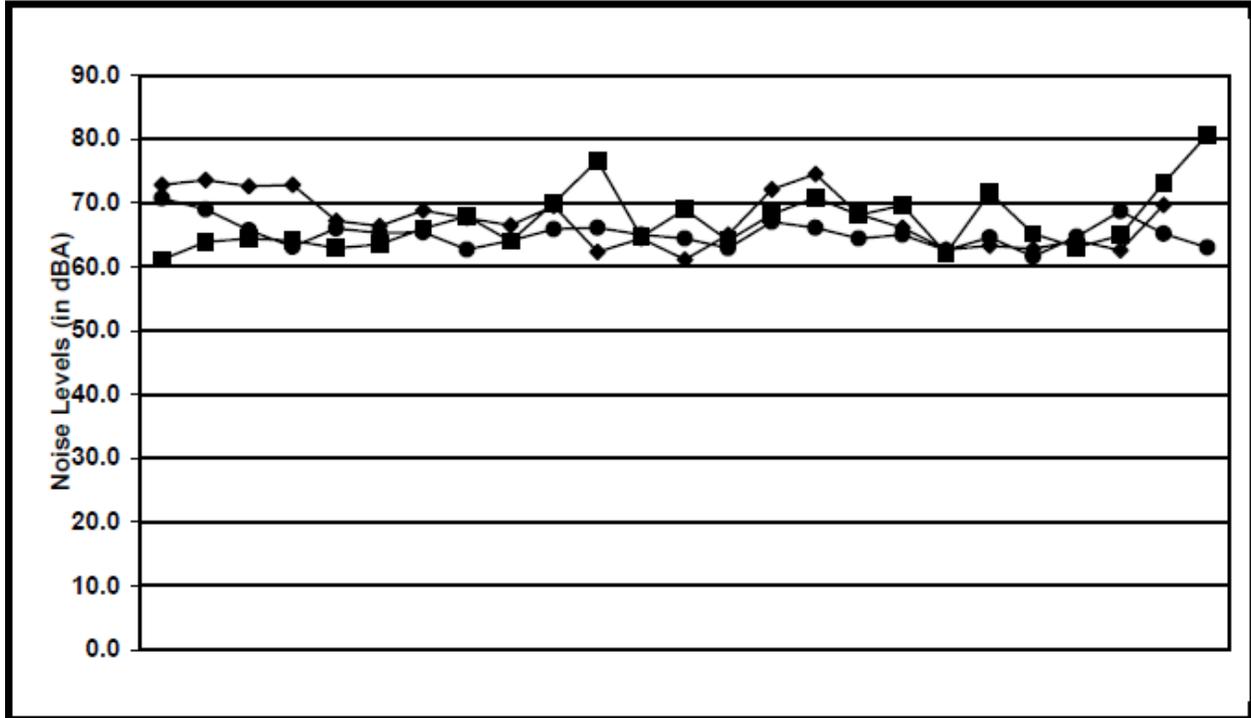
<sup>85</sup> Blodgett/Baylosis Environmental Planning. *Site Survey* (The site visit was conducted on August 14, 2014).

<sup>86</sup> Arch Beach Consulting Traffic Impact Analysis. TTM72192-WC Homes TIA, August 14, 2014.



## EXHIBIT 3-11 TYPICAL NOISE SOURCES AND LOUDNESS SCALE

Source: Blodgett/Baylosis Environmental Planning



**West side of the project site along Bannister Avenue (Includes east and west measurements).**

**EXHIBIT 3-12**  
**NOISE MEASUREMENT RESULTS**  
Source: Blodgett/Baylosis Environmental Planning

*C. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? Less than Significant Impact.*

The cumulative traffic associated with the proposed project would not be great enough to result in a measurable or perceptible increase in traffic noise (it typically requires a doubling of traffic volumes to increase the ambient noise levels to 3.0 dBA or greater). As a result, the traffic noise impacts resulting from the proposed project's occupancy are deemed to be less than significant.

*D. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? Less than Significant Impact with Mitigation.*

Noise levels associated with various types of construction equipment are summarized in Exhibit 3-13. Composite construction noise is best characterized in a study prepared by Bolt, Beranek, and Newman. In the aforementioned study, the noisiest phases of construction are anticipated to be 89 dBA as measured at a distance of 50 feet from the construction activity. This value takes into account both the number of pieces and spacing of the heavy equipment typically used in a construction effort.

In later phases during building erection, noise levels are typically reduced from these values and the physical structures further break up line-of-sight noise. As a worst-case scenario, the 89 dBA value was used as an average noise level for the construction activities. Based on spreading losses, noise levels could exceed 70 dBA at the property line. The following mitigation measures are required to mitigate potential construction noise impacts:

- The Applicant shall ensure that the contractors conduct demolition and construction activities between the hours of 7:00 AM and 6:00 PM on weekdays and 9:00 AM to 5:00 PM on Saturdays, with no construction permitted on Sundays or Federal holidays.
- The Applicant shall ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment as a means to reduce machinery noise.
- The Applicant shall notify the nearby residents along Bannister Avenue as to the times and duration of construction activities. In addition to the notification of the individual residences, signage must be placed on the construction security fences that would be located along the project site. The individual signs must clearly identify a contact person (and the phone number) that local residents may call to complain about noise related to construction and/or operations.

The mitigation measures identified above would address the potential short-term construction related noise impacts.

Typical noise levels 50-ft. from source

			70	80	90	100
<i>Equipment Powered by Internal Combustion Engines</i>	<i>Earth Moving Equipment</i>	<b>Compactors (Rollers)</b>		70-80		
		<b>Front Loaders</b>		70-80	80-90	
		<b>Backhoes</b>		70-80	80-90	90-100
		<b>Tractors</b>			80-90	90-100
		<b>Scrapers, Graders</b>			80-90	
		<b>Pavers</b>			80-90	
		<b>Trucks</b>			80-90	90-100
	<i>Materials Handling Equipment</i>	<b>Concrete Mixers</b>		70-80	80-90	
		<b>Concrete Pumps</b>			80-90	
		<b>Cranes (Movable)</b>		70-80	80-90	
		<b>Cranes (Derrick)</b>		70-80	80-90	
	<i>Stationary Equipment</i>	<b>Pumps</b>	70-80			
		<b>Generators</b>		70-80		
		<b>Compressors</b>			80-90	
	<i>Impact Equipment</i>	<b>Pneumatic Wrenches</b>			80-90	
<b>Jack Hammers</b>				80-90	90-100	
<b>Pile Drivers</b>					90-100	100+
<i>Other Equipment</i>	<b>Vibrators</b>	70-80	70-80			
	<b>Saws</b>		70-80			

**EXHIBIT 3-13**  
**TYPICAL CONSTRUCTION NOISE LEVELS**  
 Source: Blodgett/Baylosis Environmental Planning

*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? No Impact.*

The project site is located approximately 1.8 miles east of the El Monte Airport which is operated by Los Angeles County. The proposed project will not affect any airport land use plan because there currently is no Airport Land Use Compatibility Plan for the El Monte Airport.<sup>87</sup> As a result, the proposed project's implementation would not present a safety hazard to aircraft and/or airport operations at a public use airport.

*F. Within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? No Impact.*

The project site is not located within two miles of an operational private airport. As a result, no impacts related to the exposure of persons to aircraft noise from a private airstrip would result from the proposed project.

### **3.12.3 CUMULATIVE IMPACTS**

The analysis indicated the implementation of the proposed project would not result in any significant unmitigable adverse cumulative noise impacts. As a result, no significant adverse cumulative noise impacts would occur.

### **3.12.4 MITIGATION MEASURES**

Construction and operational activities must conform to the City of El Monte Noise Control Ordinance. In addition, the following mitigation measure is required to mitigate potential construction noise impacts:

*Mitigation Measure No. 17 (Noise Impacts).* The developer shall install double-paned windows in each unit that has a line of site of the I-605 Freeway and Bannister Avenue as a means to further reduce noise levels. The installation of thicker double-paned windows can reduce noise by up to 20% and well-designed vinyl frames can help reduce it by as much as 50%.

*Mitigation Measure No. 18 (Noise Impacts).* Each dwelling unit shall be constructed with weather-stripped solid core exterior doors and exterior wall/roof assemblies insulated to further reduce interior ambient noise levels. This mitigation measure will reduce the noise levels by approximately 6 dB.

*Mitigation Measure No. 19 (Noise Impacts).* The Applicant shall ensure that the contractors conduct demolition and construction activities between the hours of 7:00 AM and 6:00 PM on weekdays and 9:00 AM to 5:00 PM on Saturdays, with no construction permitted on Sundays or Federal holidays.

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<sup>87</sup> Los Angeles County Department of Regional Planning, *Los Angeles County Airport Land Use Commission (ALCU)*. <http://planning.lacounty.gov/aluc/airports>

*Mitigation Measure No. 20 (Noise Impacts).* The Applicant shall ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment as a means to reduce machinery noise.

*Mitigation Measure No. 21 (Noise Impacts).* The Applicant shall notify the nearby residents along Bannister Avenue to the times and duration of construction activities. In addition to the notification of the individual residences, signage must be placed on the construction security fences that would be located along the project sites. The individual signs must clearly identify a contact person (and the phone number) that local residents may call to complain about noise related to construction and/or operations. The Applicant would also be responsible for maintaining records of any complaint calls that may be reviewed by the City.

### 3.13 POPULATION AND HOUSING IMPACTS

#### 3.13.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, a project may be deemed to have a significant impact on housing and population if it results in any of the following:

- A substantial growth in the population within an area, either directly or indirectly related to a project;
- The displacement of a substantial number of existing housing units, necessitating the construction of replacement housing; or,
- The displacement of substantial numbers of people, necessitating the construction of replacement housing.

#### 3.13.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project induce substantial population growth in an area, either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)? Less than Significant Impact.*

The proposed project involves the construction of the 23 units that will be built on a vacant underutilized property that is surrounded by urban development. Three vacant residences are located in the northernmost portion of the project site. These three homes, which have been vacant for more than one year, will be demolished to accommodate the proposed project. The existing-growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. The variables that typically contribute to growth-inducing impacts are identified in Table 3-7. As indicated in Table 3-7, the proposed project will not result in any significant growth-inducing impacts.

**Table 3-7  
 Potential Growth-Inducing Impacts**

<b>Factor Contributing to Growth Inducement</b>	<b>Project's Potential Contribution</b>	<b>Basis for Determination</b>
New development in an area presently undeveloped and economic factors which may influence development.	The proposed project would promote development of an underutilized parcel.	The new development would promote development consistent with the General Plan Policies for infill development
Extension of roadways and other transportation facilities.	Other than the improvements to Bannister Avenue, the proposed project would not involve the extension or modification of any off-site existing roadways.	The only off-site improvements include those required to facilitate access to the project site.

**Table 3-7  
 Potential Growth-Inducing Impacts**

<b>Factor Contributing to Growth Inducement</b>	<b>Project's Potential Contribution</b>	<b>Basis for Determination</b>
Extension of infrastructure and other improvements.	The proposed project will involve a 5 foot dedication along Bannister Avenue's frontage with the project site. No other off-site water, sewer, and other critical infrastructure improvements are anticipated.	The only infrastructure improvements would be designed to serve the proposed project site only.
Major off-site public projects (treatment plants, etc).	No major facilities are proposed at this time.	No off-site facilities would be required to accommodate the projected demand for wastewater treatment or water.
The housing requiring replacement housing elsewhere.	The project does not involve the removal or the replacement of existing affordable or subsidized housing units.	No subsidized affordable housing would be affected by the proposed project.
Additional population growth leading to increased demand for goods and services.	The proposed project would not result in long-term growth in employment.	New long-term employment would be provided by the proposed project. Given the area's high unemployment rate, the additional jobs are seen as a benefit.
Short-term growth inducing impacts related to the project's construction.	The proposed project may result in the creation of new construction employment.	Short-term increases in construction employment are considered a beneficial impact.

Source: Blodgett/Baylosis Environmental Planning. 2014.

The proposed 23 units will result in a potential population of 92 persons which assumes an average household size of 4 persons per units (this average household size figure was taken from the 2010 Census). According to the Growth Forecast released by SCAG in conjunction with the Regional Transportation Plan for 2012-2035, the City of El Monte is projected to have 140,100 residents by 2035.<sup>88</sup> The City has a total population of 113,475 according to 2010 Census.<sup>89</sup> The projected population increase is within the population projection provided by SCAG. As a result, implementation of the project would result to less than significant impact.

*B. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? No Impact.*

The proposed project involves the demolition of some dilapidated obsolete structures, including three vacant residences (that have been vacant for more than one year) to accommodate for the construction of a new residential planned development with attached ~~three~~ two car garages each. According to the City of El Monte's 2014-2021 Housing Element, "more than 3,000 housing units are projected to be constructed throughout the planning period, which is nearly double the remaining RHNA."<sup>90</sup>

<sup>88</sup> Southern California Association of Governments Regional Transportation Plan 2012-2035, Growth Forecast Appendix. Adopted April 2012.

<sup>89</sup> United States Census Bureau. *El Monte (city), California*. <http://quickfacts.census.gov/qfd/states/06/0622230.html>

<sup>90</sup> City of El Monte. 2014-2021 *Housing Element*. Page H-25.

The proposed project's implementation would not result in the displacement of any residential units. However, 23 more new units would be constructed. As a result, no impacts related to displaced housing would occur.

*C. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? No Impact.*

As indicated previously, the proposed project involves the demolition of some dilapidated obsolete structures, including three vacant residences (that have been vacant for more than one year). As a result, no impacts are anticipated with the proposed project's implementation.

### **3.13.3 CUMULATIVE IMPACTS**

The analysis of potential population and housing impacts indicated that no impacts would result from the proposed project's implementation. As a result, no cumulative housing and population impacts would occur.

### **3.13.4 MITIGATION MEASURES**

The analysis of potential population and housing impacts indicated that no impacts would result from the proposed project's implementation.

### **3.14 PUBLIC SERVICES IMPACTS**

#### **3.14.1 THRESHOLDS OF SIGNIFICANCE**

According to the City of El Monte, a project may be deemed to have a significant adverse impact on public services if it results in any of the following:

- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives relative to fire protection services;
- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives relative to police protection services;
- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives relative to school services; or,
- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives relative to other government services.

#### **3.14.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

A. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives relative to fire protection services? Less than Significant Impact with Mitigation.*

The Los Angeles County Fire Department (LACFD) provides fire protection services in the City of El Monte. The City is located within the service boundaries of Battalion 10. The first response station to the project sites is Station No. 167 located at 11567 Bryant Road in the City of South El Monte. Resources from the additional stations operated by the LACFD would be made available if needed.<sup>91</sup> Future development of the new planned residential units would be subjected to any conditions prescribed by the LACFD (compliance with applicable codes and ordinances including those related to emergency access, fire flows, etc.). The proposed project would also be required to adhere to all pertinent site and building design

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<sup>91</sup> City of El Monte (and Planning Center). *General Plan and Zoning Code Update and EIR Existing Conditions Report*. May 24, 2006.

regulations. Compliance with the following mitigation as well as the pertinent codes and ordinances, would reduce the impacts to levels that are less than significant:

- The proposed project will undergo review by the Los Angeles County Fire Department to ensure that sprinklers, hydrants, fire flow, etc. are adequate in meeting the Department's requirements.
- The Applicant and the future Homeowners Association will be required to indicate that vehicle parking on the private internal roadways will not be permitted as a means to provide sufficient clearance for emergency vehicles.
- The Applicant shall install signage along the internal private street stating "No Parking Anytime" to ensure proper fire equipment access.

The aforementioned requirements will reduce the potential impacts to levels that are less than significant.

*B. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives relative to police protection? Less than Significant Impact with Mitigation.*

Law enforcement services within the City are provided by the El Monte Police Department (EMPD) which serves the community from two police stations: the main station is located at 11333 Valley Boulevard and a secondary facility located at 10503 Valley Boulevard. The El Monte Police Department is staffed with 161 police officers, 91 civilian staff and four K-9 units.<sup>92</sup> The completion of the 23 proposed residential units would likely result in increase calls for service. To ensure the proposed residential project elements adhere to the City's security requirements, the following mitigation will be required:

- The El Monte Police Department shall review the site plan for the planned residential development to ensure that the development adheres to the EMPD requirements.

As a result, the proposed project's law enforcement service impacts are less than significant.

*C. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, or other performance objectives relative to school services? Less than Significant Impact.*

The City is served by the El Monte City School District and the El Monte Union High School District. Ramona Boulevard extends 537 feet to the south of the project site in an east-west orientation.<sup>93</sup> Fernando R Ledesma High School occupies frontage along the north side of Ramona Boulevard. The High School also directly abuts the project site to the south. La Primaria Elementary School is located directly across

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<sup>92</sup>City of El Monte (and Planning Center). *General Plan and Zoning Code Update and EIR Existing Conditions Report*. May 24, 2006.

<sup>93</sup> Google Earth.

Fernando R Ledesma High School on the south side of Ramona Boulevard.<sup>94</sup> In addition, Durfee Elementary School is located approximately 841 feet to the north of the project site.<sup>95</sup> The proposed project involves the demolition of existing on-site structures (non-residential) to allow for the construction of 23 new residential units. The project developer would be required to pay any pertinent development fees to the local school districts. As a result, the proposed project's impacts on school facilities are not considered to be significant or adverse.

*D. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives relative to other governmental services? Less than Significant Impact.*

The proposed project will involve the installation of a sewer pump to convey effluent from the residential units to the sewer main located within Bannister Avenue. This equipment may require periodic inspection though the equipment maintenance will be the responsibility of the HOA. The proposed project's implementation is not expected to have any impact on other governmental services other than those identified in the preceding sections. As a result, the impacts are considered to be less than significant.

### **3.14.3 CUMULATIVE IMPACTS**

The proposed project's implementation will result in an incremental increase in the demand for police and fire service calls. The developer will be required to pay all pertinent development fees and to ensure that the site plans and project are consistent with the most recent fire codes and safety measures outlined by the Los Angeles County Fire Department (LACFD) and the El Monte Police Department. No new facilities would be required to accommodate the proposed use. As a result, no cumulative impacts are anticipated.

### **3.14.4 MITIGATION MEASURES**

The analysis determined that the following mitigation would be required to address potential impacts to public services. These mitigation measures are identified below:

*Mitigation Measure No. 22 (Public Service Impacts).* The proposed project will undergo review by the Los Angeles County Fire Department to ensure that sprinklers, hydrants, fire flow, etc. are adequate in meeting the Department's requirements.

*Mitigation Measure No. 23 (Public Service Impacts).* The Applicant and future HOA will be required to indicate that vehicle parking on the private internal roadways will not be permitted as a means to provide sufficient clearance for emergency vehicles.

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<sup>94</sup> Blodgett/Baylosis Environmental Planning. *Site Survey* (The site visit was conducted on August 14, 2014, and the distances were calculated using Google Earth).

<sup>95</sup> Google Earth.

*Mitigation Measure No. 24 (Public Service Impacts).* The El Monte Police Department (EMPD) shall review the site plan for the planned residential development to ensure that the development adheres to the EMPD requirements.

*Mitigation Measure No. 25 (Public Service Impacts).* The Applicant shall install signage along the internal private street stating “No Parking Anytime” to ensure proper fire equipment access.

### 3.15 RECREATION IMPACTS

#### 3.15.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, a project may be deemed to have a significant adverse impact on the environment if it results in any of the following:

- The use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or,
- The construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

#### 3.15.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? No Impact.*

The City of El Monte's Parks and Recreation Division is responsible for recreational services in the City. There are twelve City facilities available to City residents.<sup>96</sup> The nearest public park is Zamora Park, located 0.75 miles southwest of the project site. The implementation of the proposed project and the resulting population increase (92 persons) will not lead to the deterioration of a park. The minor increase in population and inclusion of open space will prevent future use from exceeding capacity. The current horse trail along the San Gabriel River (below the embankment) varies in width and extends into the project site property in some areas. After development the horse trail will be a consistent 11 feet in width, and this will be a reduction in some areas. The project will not extend into any publicly owned property along the river channel.

The proposed project will also contribute property taxes that will offset the increased demand for recreational services and facilities. As a result, no impacts on park facilities would result from the implementation of the proposed project.

- B. *Would the project affect existing recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment? No Impact.*

As indicated in the previous section, the implementation of the proposed project would not physically affect any existing parks and recreational facilities in the City. The proposed project would involve the demolition of some existing dilapidated and obsolete structures and the construction of a new planned residential development. The nearest public park is Zamora Park, located 0.75 miles southwest of the project site. The proposed project would not physically impact this park or any other park facilities since the population increase from the proposed project will not be enough to warrant the construction of new park facilities or the expansion of current facilities. In addition, 24,978 square feet of open space is provided within the

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<sup>96</sup> <http://www.ci.el-monte.ca.us/Government/ParksandRecreation/ParksRecreation.aspx>

private yard areas. The project Applicant will also be required to pay any pertinent park development or Quimby fees. As a result, no impacts on park facilities would result from the implementation of the proposed project.

### **3.15.3 CUMULATIVE IMPACTS**

The analysis determined the proposed project would not result in any potential impact on recreational facilities and services. As a result, no cumulative impacts on recreational facilities would result from the proposed project's implementation.

### **3.15.4 MITIGATION MEASURES**

The analysis of potential impacts related to parks and recreation indicated that no impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

## 3.16 TRANSPORTATION & CIRCULATION IMPACTS

### 3.16.1 THRESHOLDS OF SIGNIFICANCE

According to the City of El Monte, a project would normally have a significant adverse impact on traffic and circulation if it results in any of the following:

- 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;
- A conflict with an applicable congestion management program, including but not limited to, level of service standards and travel demand measures, or other standards established by the County Congestion Management Agency for designated roads or highways;
- Results in a change in air traffic patterns, including either an increase in traffic levels or a change in the location that results in substantial safety risks;
- Substantially increases hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- Results in inadequate emergency access; and,
- A 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 study area intersections were analyzed using the *Intersection Capacity Utilization* (ICU) methodology for signalized intersections, or the *Highway Capacity Manual* (HCM) “Operations” methodology for unsignalized intersections. The ICU method determines the volume-to-capacity (V/C) ratio on a critical lane basis and determines LOS associated with each critical V/C ratio at the signalized intersection. The unsignalized intersection was analyzed using the HCM methodology. The HCM method determines the average control delay a driver may experience at the intersection.<sup>97</sup>

The degree of congestion at an intersection is described by the level of service, which ranges from LOS A to LOS F, with LOS A representing free-flow conditions with little delay and LOS F representing over-saturated traffic flow throughout the peak hour. A complete description of the meaning of level of service can be found in the Highway Research Board Special Report 209, *Highway Capacity Manual* (HCM 2000). Brief descriptions of the six levels of service for signalized intersections are shown in Table 3-8.

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<sup>97</sup> Arch Beach Consulting. *Traffic Impact Analysis [for the] Tentative Tract Map 72192, WC Homes. City of El Monte California.* August 14, 2014.

**Table 3-8  
 Level of Service Definitions**

<b>Level of Service</b>	<b>V/C Ratio or ICU (signalized)</b>	<b>Control Delay in Seconds (unsignalized)</b>
A	0.00 – 0.60	0.0 – 10.0 seconds
B	0.61 – 0.70	10.1 – 15.0 seconds
C	0.71 – 0.80	15.1 – 25.0 seconds
D	0.81 – 0.90	25.1 – 35.0 seconds
E	0.91 – 1.00	35.1 – 50.0 seconds
F	1.01 or greater	50.1 seconds or greater

Table 3-9, included on the following page, provides a description of each specific level of service grade (LOS A through LOS F).

**Table 3-9  
 Level of Service Descriptions**

<b>LOS</b>	<b>Description</b>
A	No approach phase is fully utilized by traffic, and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily, and nearly all drivers find freedom of operation.
B	This service level represents stable operation, where an occasional approach phase is fully utilized and a substantial number are nearing full use. Many drivers begin to feel restricted within platoons of vehicles.
C	This level still represents stable operating conditions. Occasionally drivers may have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so.
D	This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
E	Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection approach can accommodate. Full utilization of every signal cycle is seldom attained no matter how great the demand.
F	This level describes forced flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from a restriction downstream. Speeds are reduced substantially, and stoppages may occur for short or long periods of time due to the congestion. In the extreme case, both speed and volume can drop to zero.

Source: Highway Capacity Manual, Transportation Research Board, Special Report No. 209, Washington, D.C., 2000.

Per the City’s General Plan Circulation Element (2011), the City desires to maintain LOS D throughout the City, except that LOS E may occur in the following circumstances:

- Intersections/roadways at, or adjacent to, freeway ramps;
- Intersections/roadways on major corridors and transit routes;
- Intersections/roadways on truck routes; and,
- Intersections/roadways in, or adjacent to, commercial districts.<sup>98</sup>

Therefore, a project would have a significant impact if it resulted in an increase in the V/C ratio of an intersection operating at LOS E or F according to the Circulation Element (refer to Table 3-10).

**Table 3-10  
 Significance Criteria**

<b>Level of Service</b>	<b>Final V/C Ratio</b>	<b>Project-Related Increase in V/C</b>
E, F	> 0.900	equal to or greater than 0.010

For intersections significantly impacted by the project in the weekday a.m. and/or p.m. peak hours, mitigation measures would be provided to bring the intersection LOS back to baseline (i.e., “before project”) LOS levels. Once an unsignalized intersection is found to operate at LOS E or F, a traffic signal warrant consistent with the *Manual of Uniform Traffic Control Devices* (MUTCD) would need to be prepared to determine whether signalization of the intersections would be warranted. If the proposed project causes a traffic signal warrant to be met, that would be considered a significant impact.<sup>99</sup> This traffic study analyzed the following traffic scenarios:

- *Existing Condition.* Existing traffic volumes were collected at the study intersections in mid-July 2014 during a typical summer weekday. There were four schools in the study area that were closed for the summer break: Durfee Elementary School to the north; La Primaria Elementary School and Fernando Ledesma Continuation High School to the south; and, Wright Elementary School to the west. Traffic related to those schools were estimated using trip rates from *Trip Generation, 9<sup>th</sup> Edition* from the Institute of Transportation Engineers (ITE), distributed on to the study area based on their assumed attendance boundaries, and added to the existing summer traffic volumes. This adjusted existing traffic scenario constitutes the environmental setting in accordance with the CEQA analysis at the time that the hearing body reviews the proposed project.
- *Existing plus Project Condition.* The Existing plus Project Condition traffic was developed by adding the proposed project traffic to the Existing (adjusted) Condition. This scenario was the basis for determining project-specific impacts and mitigation measures.
- *Opening Year 2016 Baseline Condition.* The proposed project is anticipated to be built and occupied by year 2016. Opening year traffic in this scenario was forecast for 2016 by applying an

<sup>98</sup> Arch Beach Consulting. *Traffic Impact Analysis [for the] Tentative Tract Map 72192, WC Homes. City of El Monte California.* August 14, 2014.

<sup>99</sup> Ibid.

annual ambient growth rate to the existing traffic volumes. In addition to the ambient growth rate, traffic from approved and pending projects (i.e. cumulative projects) in the project's vicinity has been added.

- *Opening Year 2016 plus Project Condition.* The Opening Year 2016 plus Project Condition traffic was developed by adding the proposed project traffic to the Opening Year Baseline Condition. This scenario was also the basis for determining project-specific impacts and mitigation measures.<sup>100</sup>

Regional access to the project site is provided by Interstate 605 (I-605) via its interchange with Ramona Boulevard and Lower Azusa Road. Local access to the project site is provided by Maxson Road, Bannister Avenue, and Lambert Avenue. Per direction from the City, the study area intersections are as follows:

1. Maxson Road/Lower Azusa Road;
2. Maxson Road/Star Street;
3. Maxson Road/Lambert Avenue;
4. Maxson Road/Ramona Boulevard;
5. Peck Road/Lambert Avenue; and,
6. Gilman Road/Ramona Boulevard.<sup>101</sup>

All study area intersections are within the jurisdiction of the City and are shown in Exhibit 3-14.

### **3.16.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

- A. *Would the project cause 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? No Impact.*

The City's circulation system is served by a network of freeways, arterial roadways, and local streets. The three regional freeways include the Interstate 10 Freeway (I-10), the Interstate 605 Freeway (I-605), and State Route 60 (SR-60). The principal regional access to the City is provided by the I-10 Freeway, which traverses El Monte in an east-to-west orientation. The I-10 Freeway has five general-purpose lanes in each direction. The I-605 Freeway extends in a north-to-south orientation east of the City. Finally, the SR-60 Freeway is located to the south of the City and runs in an east-west direction.<sup>102</sup>

Existing traffic volumes were collected at the study intersections in mid-July 2014 during a typical summer weekday. There were four schools in the study area that were closed for the summer break: Durfee Elementary School to the north; La Primaria Elementary School and Fernando Ledesma Continuation High School to the south; and, Wright Elementary School to the west. Traffic related to those schools were estimated using trip rates from *Trip Generation, 9<sup>th</sup> Edition* (ITE), distributed on to the study area based

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<sup>100</sup> Arch Beach Consulting. *Traffic Impact Analysis [for the] Tentative Tract Map 72192, WC Homes. City of El Monte California.* August 14, 2014.

<sup>101</sup> Ibid.

<sup>102</sup> Ibid.

on their assumed attendance boundaries, and added to the existing summer traffic volumes. Regional access to the project site is provided by Interstate 605 (I-605) via its interchange with Ramona Boulevard and Lower Azusa Road. Local access is provided by Maxson Road, Bannister Avenue, and Lambert Avenue. The following describes the roadways in the study area:

- *Lower Azusa Road* is designated as a Secondary Arterial and Truck Route in the City's *General Plan, Circulation Element*. Lower Azusa Road provides east-west regional and local access throughout the City of El Monte starting at its intersection with Rosemead Boulevard (SR 19) to the west, and where it becomes Los Angeles Street in Baldwin Park, east of I-605. In the vicinity of the study area, Lower Azusa Road is a divided four-lane roadway with a painted median serving as a two-way left-turn lane (TWLTL). On-street parking is permitted on both sides of the street, and the posted speed limit is 35 miles per hour (MPH). In addition, Foothill Transit operates a bus route along Lower Azusa with a stop on the south side of the street, before Durfee Avenue.
- *Ramona Boulevard* is designated as a Secondary Arterial, Truck Route, and Mid Valley Transit Corridor in the City's *General Plan, Circulation Element*. Ramona Boulevard provides east-west regional and local access throughout the City of El Monte starting at its intersection with Santa Anita Avenue to the west, and where it becomes San Bernardino Road in Baldwin Park, at its intersection with Puente Avenue. In the vicinity of the study area, Ramona Boulevard is a divided four-lane roadway with a painted median serving as a two-way left-turn lane (TWLTL). On-street parking is not permitted on either side of the street, and the posted speed limit is 35 MPH. In addition, Foothill Transit operates a bus route along Ramona Boulevard with stops on both sides of Ramon Boulevard at Maxson Road.
- *Maxson Road* is designated as a part of the Backbone Street System in the City's *General Plan, Circulation Element*. Maxson Road provides north-south local access between Lower Azusa Road and Ramona Boulevard. In the vicinity of the study area, Maxson Road is an undivided two-lane roadway. On-street parking is permitted on both sides of the street, and the posted speed limit is 25 MPH.
- *Bannister Avenue* provides north-south local access between Star Street and its mid-block road-block, and the road-block and Lambert Avenue. Only pedestrian and bicycle access is allowed through the road-block. Bannister Avenue is an undivided two-lane roadway, and on-street parking is permitted on both sides of the street.<sup>103</sup>

Currently, there is a permanent vehicular road-block for traffic on Bannister Avenue, midway between Star Street and Lambert Avenue, north and adjacent to the northern boundary of the proposed project. The property located at 4441 Bannister Avenue extends halfway into the street, thus restricting access between the two halves of Bannister Avenue. The road block (consisting of yellow cylinders) was placed to close off the remaining narrow portion of the road preventing through access. The proposed project would enhance the south side of the road-block by curving Bannister Avenue into the project's driveway, and building a

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<sup>103</sup> Arch Beach Consulting. *Traffic Impact Analysis [for the] Tentative Tract Map 72192, WC Homes. City of El Monte California.* August 14, 2014.

continuous sidewalk on both sides of Bannister Avenue, and enhancing the walkway through the road-block.

Exhibit 3-14, shown previously, illustrates the existing traffic controls and lane geometrics at the study area intersections and roadway segments. Existing traffic volumes were collected at the study intersections in mid-July 2014 during a typical summer weekday. There were four schools in the study area that were closed for the summer break: Durfee Elementary School to the north; La Primaria Elementary School and Fernando Ledesma Continuation High School to the south; and, Wright Elementary School to the west. Traffic related to those schools were estimated using trip rates from *Trip Generation, 9<sup>th</sup> Edition* (ITE), distributed on to the study area based on their assumed attendance boundaries, and added to the existing summer traffic volumes. Exhibit 3-15 shows the (adjusted) existing daily, a.m. and p.m. peak hour traffic volumes at the study intersections. The raw traffic volume count sheets are provided in Appendix A.

Appendix B contains the worksheets that show the trip generation, manual addition, and distribution of school traffic volumes from the four schools in the study area.<sup>104</sup> Based on the analysis methodology described in Section 1.0, the existing a.m. and p.m. peak hour traffic volumes were input into the *Traffix* LOS software to determine the existing intersection delay and LOS values. The existing field-calculated peak hour factors (PHF) were adjusted to account for the short peaking traffic characteristics of the drop-off/pick-up operations of the adjacent schools. Table 3-11 presents the results of the existing intersection LOS analysis, while the LOS calculation sheets are provided in Appendix C of the Traffic Report. Based on the existing LOS analysis, the existing study area intersections are currently operating with satisfactory LOS (LOS D or better) during both peak hours.

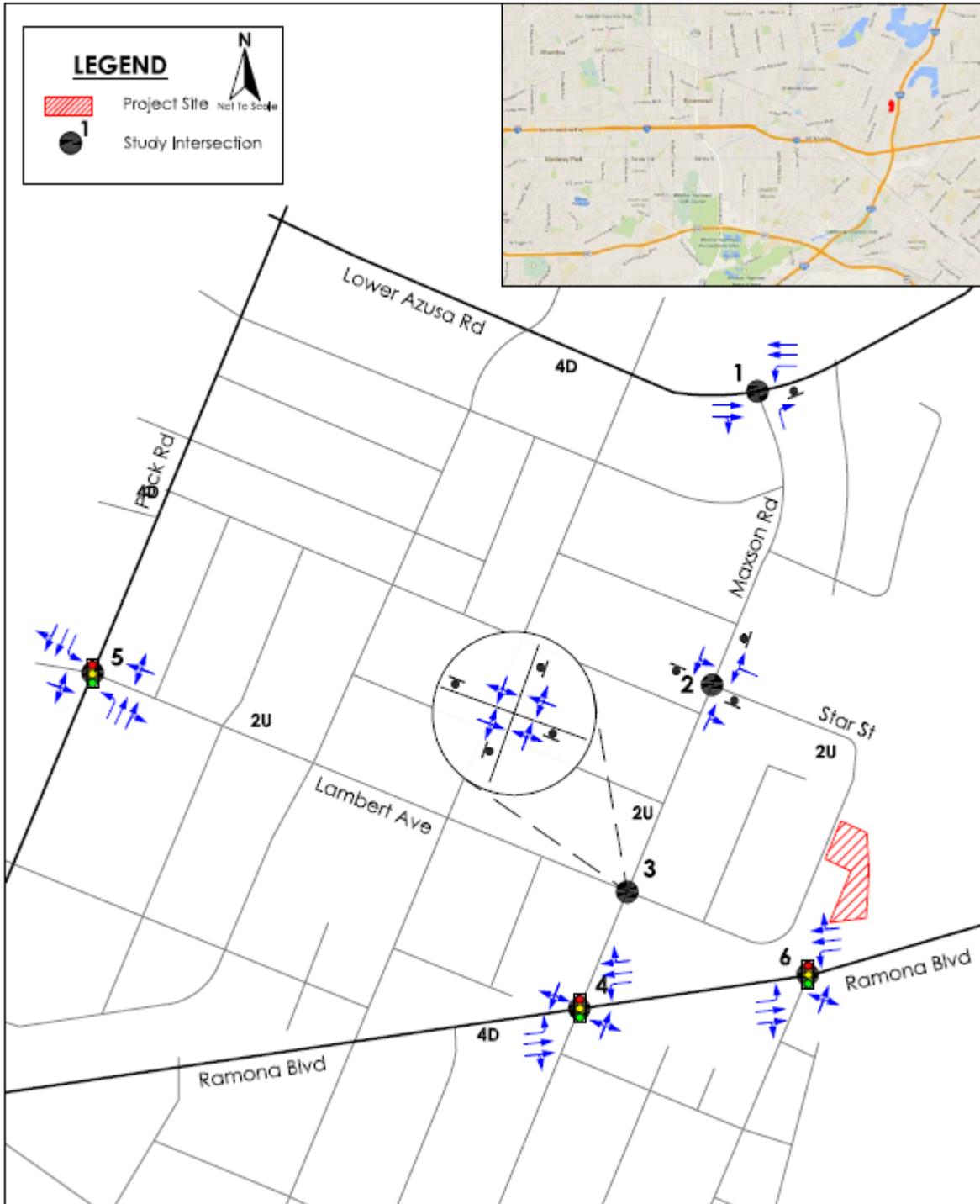
**Table 3-11  
 Existing (adjusted) Condition Intersection Level of Service Summary**

Intersection	Control	Existing Condition			
		AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
1. Maxson Road/Lower Azusa Road	1-way stop	10.9 sec	B	14.3 sec	B
2. Maxson Road/Star Street	all-way stop	10.3 sec	B	8.1 sec	A
3. Maxson Road/Lambert Avenue	all-way stop	10.3 sec	B	10.4 sec	B
4. Maxson Road/Ramona Boulevard	signal	0.708	C	0.657	B
5. Peck Avenue/Lambert Avenue	signal	0.706	C	0.691	B
6. Gilman Road/Ramona Boulevard	signal	0.544	A	0.607	B

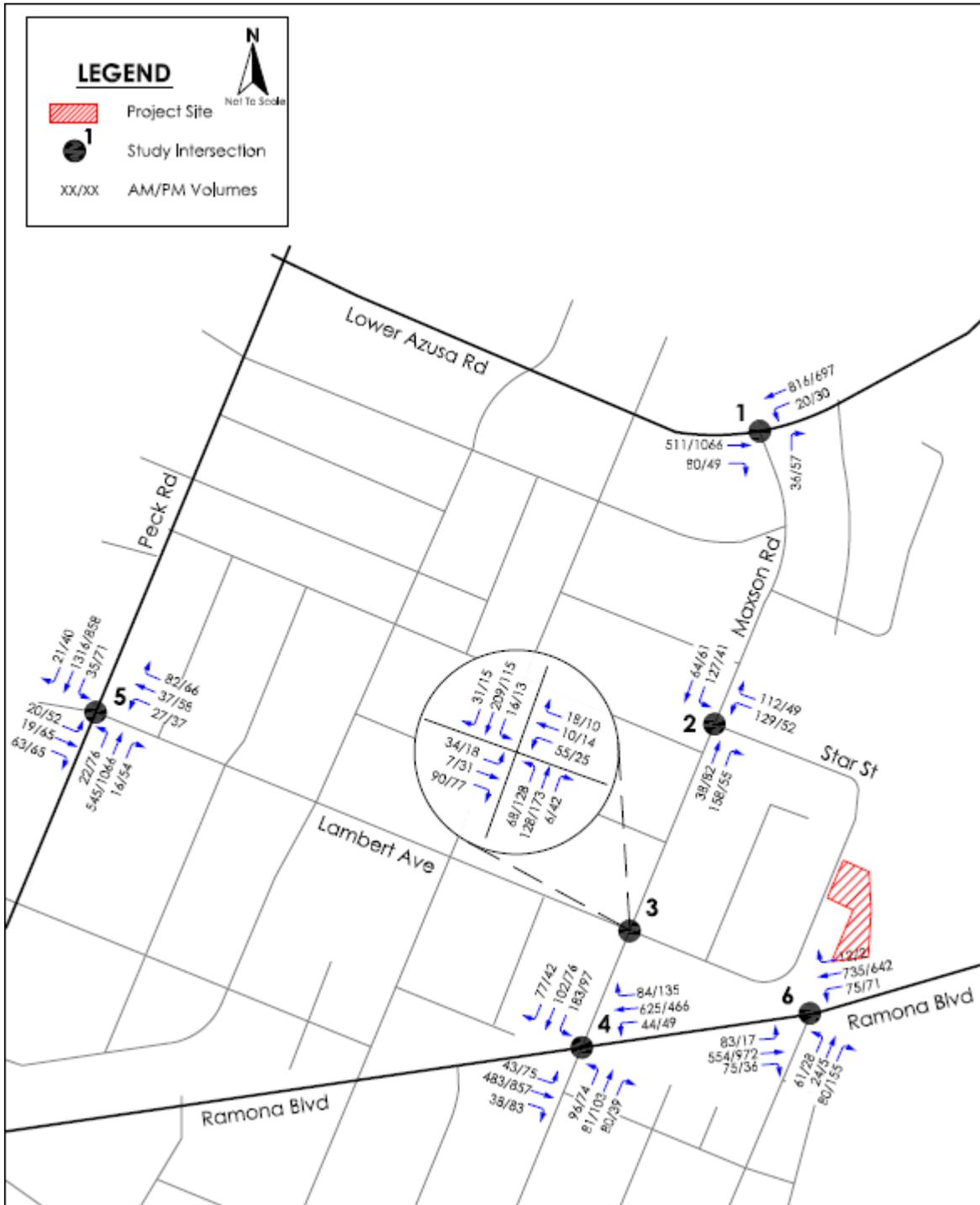
Notes: LOS for signalized intersections based on *Intersection Capacity Utilization* (ICU); LOS for unsignalized intersections based on *Highway Capacity Manual* (HCM).

**Bold** value indicates intersection is operating with unsatisfactory LOS, at LOS E or F.

<sup>104</sup> Arch Beach Consulting. *Traffic Impact Analysis [for the] Tentative Tract Map 72192, WC Homes. City of El Monte California.* August 14, 2014.



**EXHIBIT 3-14**  
**PROJECT SITE AND STUDY INTERSECTION LOCATIONS**  
Source: Arch Beach Consulting



**EXHIBIT 3-15**  
**EXISTING AM AND PM PEAK HOUR TRAFFIC VOLUMES**

Source: Arch Beach Consulting

Vehicular access to the proposed project and new surface parking lot would be provided from a new driveway on the east side of Bannister Avenue which would become a private street/cul-de-sac at 26 feet in width. ~~No sidewalks are proposed, and no parking would be permitted on both sides of the street. The existing public streets would remain unchanged.~~ Currently, there is a permanent vehicular road-block (bicycle) and pedestrian access is permitted) for traffic on Bannister Avenue, mid-way between Star Street and Lambert Avenue, north and adjacent to the northern boundary of the proposed project. The City is requiring that the existing Bannister Avenue barrier be removed to facilitate emergency access and response. In addition, improvements will be required to ensure the grade that is currently 7.8% meets the safety requirements of the Fire Department and Public Works Department. The project Applicant has also committed to improving (repaving and the installation of curb and gutters) the segment of Bannister Avenue that is currently a private street, to City standards. This segment of Bannister Avenue will not be a public street. Other changes include the installation of a 3-way stop at the main project entryway with Bannister Avenue and a posted speed limit of 20 MPH for all of Bannister Avenue.

~~The proposed project would enhance the south side of the road block by curving Bannister Avenue into the project's driveway, and building a continuous sidewalk on both sides of Bannister Avenue, and enhancing the walkway through the road block. The new sidewalks on Bannister Avenue, project driveway and Private Street would be designated to meet the City's design standards. The proposed project would not impede emergency access to any neighboring properties. At no time would Star Avenue, Lambert Avenue, Bannister Avenue and Maxson Road be closed to traffic during the project's construction. As a result, no impacts are anticipated. The proposed project is conditioned to provide a 5 foot dedication along Bannister Avenue in front of the project site.~~

Weekday daily, A.M. and P.M. peak hour trip generation estimates for the proposed project were developed using trip rates provided in the Institute of Transportation Engineers (ITE) Trip Generation, 9th Edition. Summaries of the trip generation rates and resulting vehicle trips for the proposed project are presented in Table 3-12. According to the table, the proposed project would generate approximately ~~210~~ 219 daily trips, 17 a.m. peak hour trips (4 inbound and 13 outbound), and 23 p.m. peak hour trips (14 outbound and 9 outbound).<sup>105</sup>

**Table 3-12  
 Project Trip Generation Estimates**

Land Use	Size/Units	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
<b>Trips Rates</b>								
Single-Family Detached Homes	per DU	9.52	0.19	0.56	0.75	0.63	0.37	1.00
<b>Trip Generation</b>								
Single-Family Detached Homes	23 DUs	<b>219</b>	<b>4</b>	<b>13</b>	<b>17</b>	<b>14</b>	<b>9</b>	<b>23</b>

Note: Trip rates from *Trip Generation, 9th Edition*, Institute of Transportation Engineers, 2012.

<sup>105</sup> Arch Beach Consulting. *Traffic Impact Analysis [for the] Tentative Tract Map 72192, WC Homes. City of El Monte California.* August 14, 2014.

Regional and local trip distribution percentages for the proposed project were based on logical peak hour commute patterns. ~~Figure 3~~ Exhibit 3-16 illustrates the trip distribution percentages for the proposed project. The trip distribution percentages at each intersection were applied to the proposed project's weekday daily, a.m. and p.m. peak hour trip generation estimates to calculate the project trip assignment. The resulting weekday daily, a.m. and p.m. peak hour trip assignments are also shown on Exhibit 3-16.

Traffic generated by the proposed project was added to the existing scenario and the project impacts on the circulation system were analyzed. This scenario would determine project-specific impacts and mitigation measures (if required) with project traffic added to existing traffic volumes. The proposed project trip assignment shown in Exhibit 3-16 was added to the existing traffic volumes in Exhibit 3-15 which resulted in the Existing plus Project traffic volumes. Exhibit 3-17 illustrates the Existing plus Project daily, a.m. and p.m. peak hour traffic volumes.

Based on the analysis methodology described in Section 1.0, the Existing plus Project a.m. and p.m. peak hour traffic volumes were input into the *Traffix* LOS software to determine the intersection delay and LOS values. The existing field-calculated peak hour factors (PHF) were adjusted to account for the short peaking traffic characteristics of the drop-off/pick-up operations of the adjacent schools. Table F presents the results of the Existing plus Project intersection LOS analysis, while the LOS calculation sheets are provided in Appendix C of the traffic study. Based on the Existing plus Project LOS analysis, all study area intersections would continue to operate with satisfactory LOS (LOS D or better) with addition of traffic from the proposed project. No mitigation measures are required.<sup>106</sup>

**Table 3-13**  
**Existing (adjusted) plus Project Intersection Level of Service Summary**

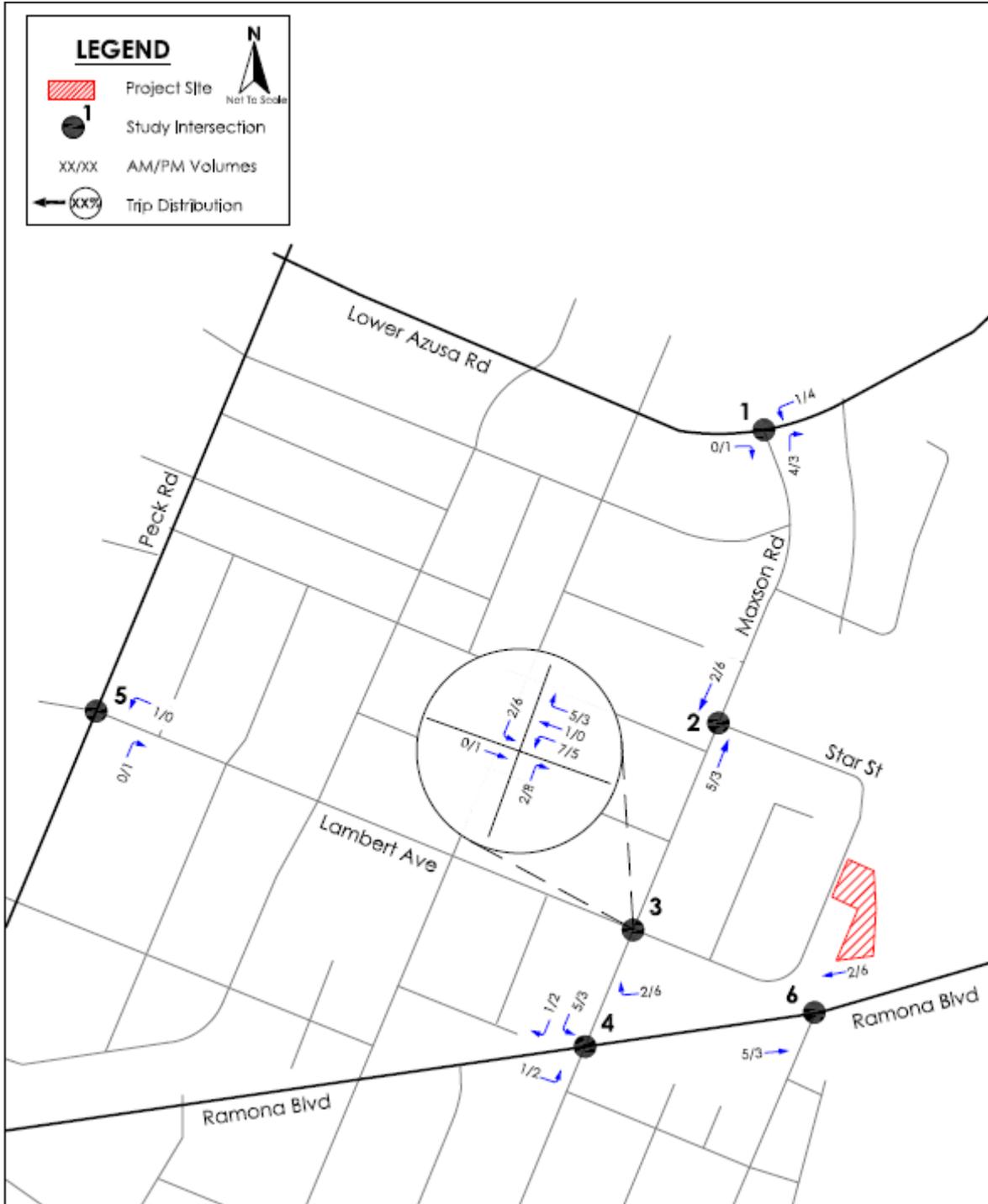
Intersection	Control	Existing Condition				Existing plus Project			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. Maxson Road/Lower Azusa Road	1-way stop	10.9 sec	B	14.3 sec	B	11.0 sec	B	14.4 sec	B
2. Maxson Road/Star Street	all-way stop	10.3 sec	B	8.1 sec	A	11.7 sec	B	8.4 sec	A
3. Maxson Road/Lambert Avenue	all-way stop	10.3 sec	B	10.4 sec	B	11.0 sec	B	10.6 sec	B
4. Maxson Road/Ramona Boulevard	signal	0.708	C	0.657	B	0.714	C	0.660	B
5. Peck Avenue/Lambert Avenue	signal	0.706	C	0.691	B	0.707	C	0.691	B
6. Gilman Road/Ramona Boulevard	signal	0.544	A	0.607	B	0.545	A	0.608	B

For signalized intersections based on *Intersection Capacity Utilization* (ICU); LOS for unsignalized intersections based on *Highway Capacity Manual* (HCM).

**Bold** value indicates intersection is operating with unsatisfactory LOS, at LOS E or F.

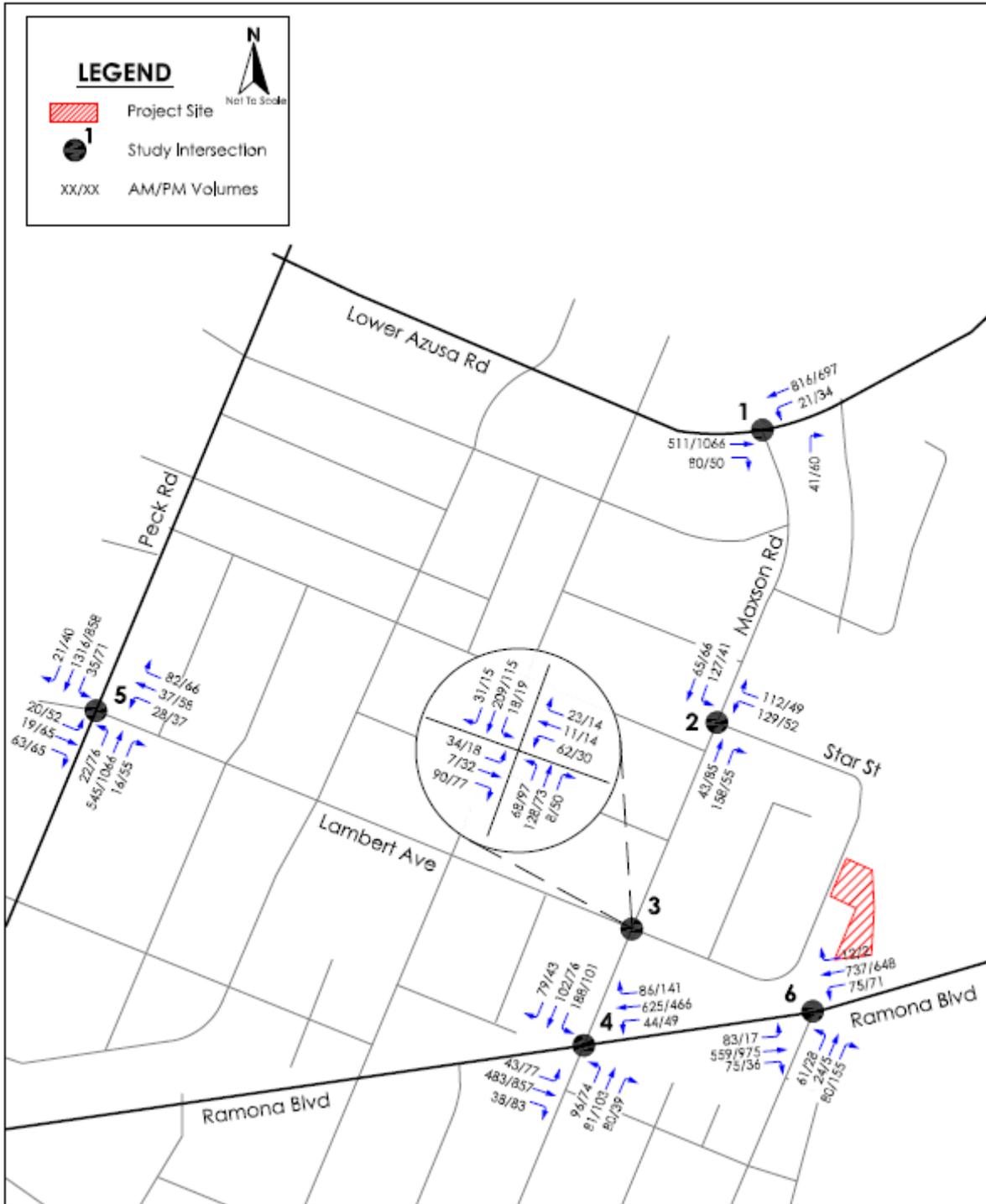
value indicates significant project impact per the appropriate City's LOS significance criteria.

<sup>106</sup> Arch Beach Consulting. *Traffic Impact Analysis [for the] Tentative Tract Map 72192, WC Homes. City of El Monte California.* August 14, 2014.



**EXHIBIT 3-16**  
**PROJECT TRIP DISTRIBUTION AND ASSIGNMENT**

Source: Arch Beach Consulting



**EXHIBIT 3-17**  
**EXISTING PLUS PROJECT AM AND PM PEAK HOUR TRAFFIC**  
**VOLUMES**

Source: Arch Beach Consulting

Based on the analysis methodology described in Section 1.0, the Opening Year 2016 Baseline a.m. and p.m. peak hour traffic volumes were input into the *Synchro* LOS software to determine the existing intersection delay and LOS values. The existing field-calculated peak hour factors (PHF) were adjusted to account for the short peaking traffic characteristics of the drop-off/pick-up operations of the adjacent elementary school. Table 3-14 (shown on the following page) presents the results of the Opening Year 2016 Baseline intersection LOS analysis, while the LOS calculation sheets are provided in Appendix D of the Traffic Study.

**Table 3-14  
 Opening Year 2016 Baseline Intersection Level of Service Summary**

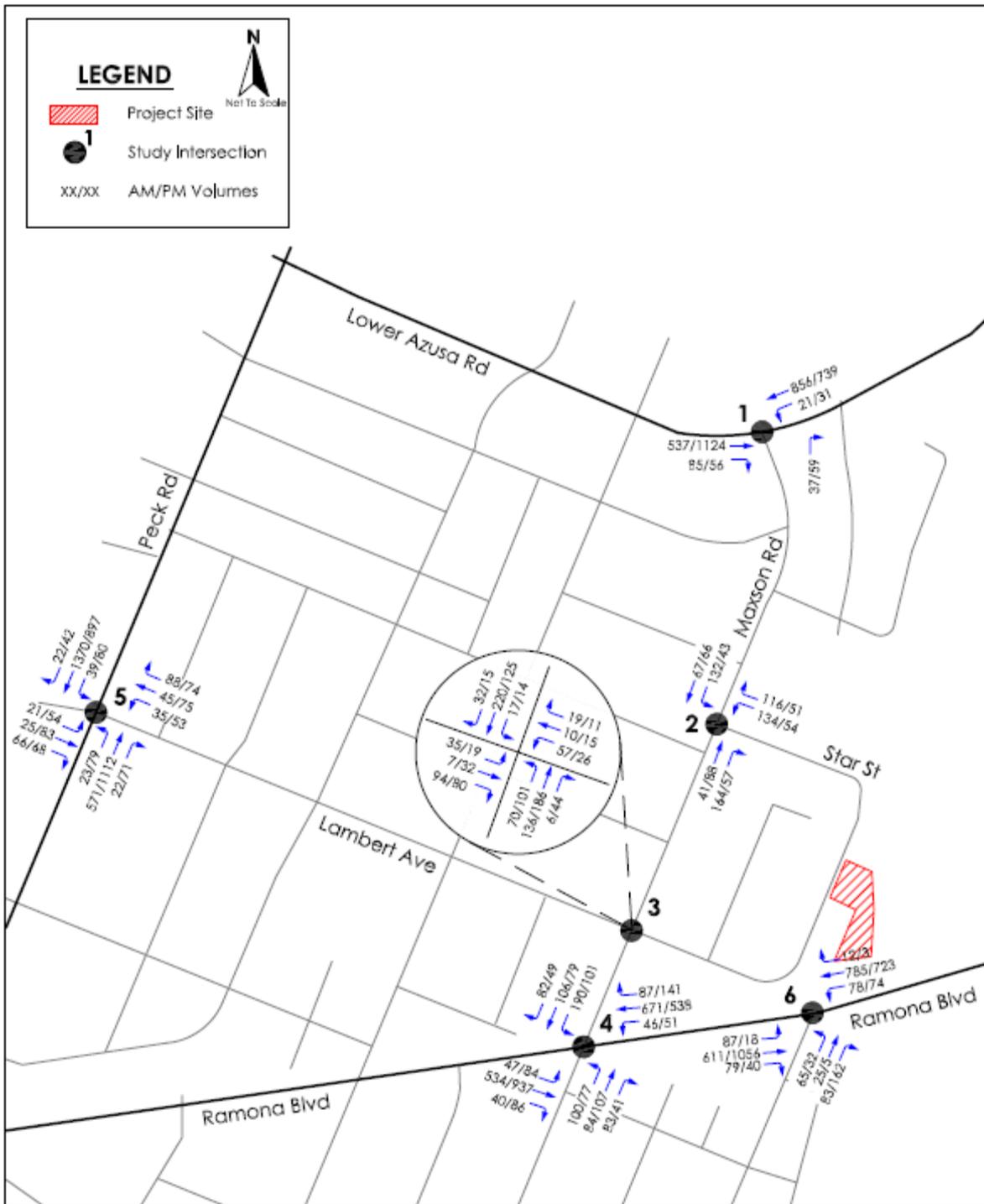
Intersection	Control	AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
1. Maxson Road/Lower Azusa Road	1-way stop	11.1 sec	B	15.0 sec	B
2. Maxson Road/Star Street	all-way stop	12.2 sec	B	8.4 sec	A
3. Maxson Road/Lambert Avenue	all-way stop	11.2 sec	B	10.9 sec	B
4. Maxson Road/Ramona Boulevard	signal	0.743	C	0.694	B
5. Peck Avenue/Lambert Avenue	signal	0.745	C	0.747	C
6. Gilman Road/Ramona Boulevard	signal	0.570	A	0.644	B

Notes: LOS for signalized intersections based on *Intersection Capacity Utilization* (ICU); LOS for unsignalized intersections based on *Highway Capacity Manual* (HCM).

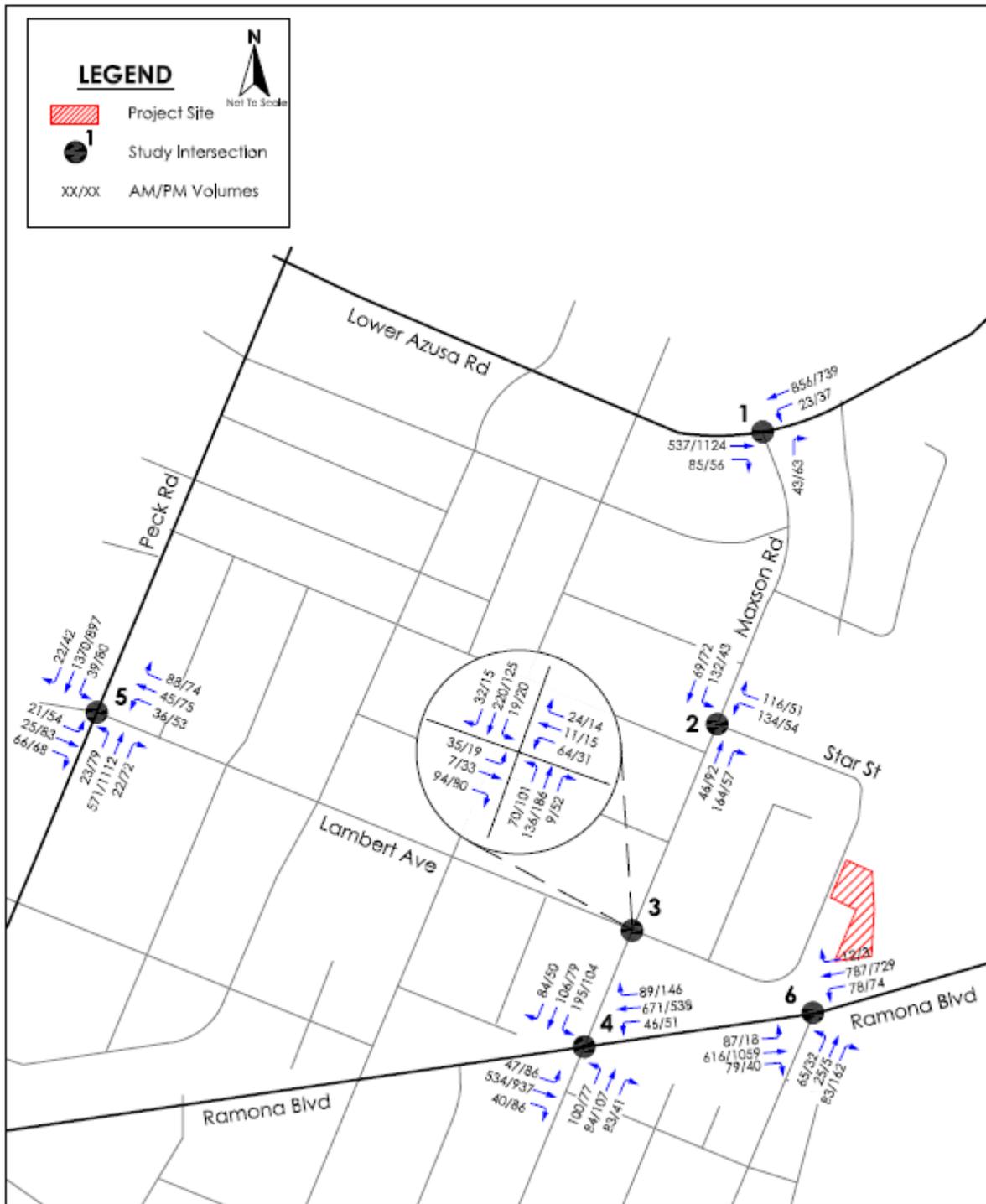
Based on the Opening Year 2016 Baseline LOS analysis, the study area intersections are forecast to continue to operate with satisfactory LOS (LOS D or better) during both peak hours.<sup>107</sup>

Traffic generated by the proposed project was added to the Opening Year 2016 Baseline scenario and the project impacts on the circulation system were analyzed. This scenario would determine project-specific impacts and mitigation measures (if required) with project traffic added to the Opening Year 2016 Baseline traffic volumes. The proposed project trip assignment shown in Exhibit 3-16 was added to the Opening Year 2016 Baseline traffic volumes in Exhibit 3-18 which resulted in the Opening Year 2016 plus Project traffic volumes. Exhibit 3-19 illustrates the Opening Year plus Project daily, a.m. and p.m. peak hour traffic volumes.

<sup>107</sup> Arch Beach Consulting. *Traffic Impact Analysis [for the] Tentative Tract Map 72192, WC Homes. City of El Monte California.* August 14, 2014.



**EXHIBIT 3-18**  
**OPENING YEAR 2016 BASELINE AM AND PM PEAK HOUR**  
**TRAFFIC VOLUMES**  
 Source: Arch Beach Consulting



**EXHIBIT 3-19**  
**OPENING YEAR 2016 PLUS PROJECT AM AND PM PEAK**  
**HOURLY TRAFFIC VOLUMES**

Source: Arch Beach Consulting

The short peaking traffic characteristics of the drop-off/pick-up operations of the adjacent elementary school are reflected in the figures shown in Table 3-15. Table 3-15 presents the results of the Opening Year 2016 plus Project intersection LOS analysis, while the LOS calculation sheets are provided in Appendix D of the Traffic Study. Based on the Opening Year 2016 plus Project LOS analysis, all study area intersections are forecast to continue to operate with satisfactory LOS (LOS D or better) with addition of traffic from the proposed project. No mitigation measures are required.<sup>108</sup>

**Table 3-15  
 Opening Year 2016 plus Project Intersection Level of Service Summary**

Intersection	Control	Opening Year Baseline Condition				Opening Year plus Project			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. Maxson Road/Lower Azusa Road	1-way stop	11.1 sec	B	15.0 sec	B	11.2 sec	B	15.1 sec	C
2. Maxson Road/Star Street	all-way stop	12.2 sec	B	8.4 sec	A	12.3 sec	B	8.5 sec	A
3. Maxson Road/Lambert Avenue	all-way stop	11.2 sec	B	10.9 sec	B	11.4 sec	B	11.1 sec	B
4. Maxson Road/Ramona Boulevard	signal	0.743	C	0.694	B	0.749	C	0.697	B
5. Peck Avenue/Lambert Avenue	signal	0.745	C	0.747	C	0.745	C	0.748	C
6. Gilman Road/Ramona Boulevard	signal	0.570	A	0.644	B	0.571	A	0.645	B

*B. Would the project result in a conflict with an applicable congestions management program, including but not limited to, level of service standards and travel demand measures, or other standards established by the County Congestion Management Agency for designated roads or highways? No Impact.*

The Congestion Management Program (CMP) is a State-mandated program that was enacted by the State Legislature with the passage of Proposition 111 in 1990. The program is intended to address the impact of local growth on the regional transportation system. The CMP Traffic Impact Analysis (TIA) guidelines require that intersection-monitoring locations be examined if the proposed project would add 50 or more trips during either the AM or PM weekday peak periods at a CMP-monitored intersection. The CMP TIA guidelines also require that freeway-monitoring locations be examined if the proposed project would add 150 or more trips (in either direction) during either the AM or PM weekday peak hours. Per review of the 2010 Los Angeles County Congestion management Program, the nearest CMP facilities in the project vicinity are Interstate 605 (I-605) and its interchanges at Ramona Boulevard and Lower Azusa Road. Per review of Appendix B of the CMP, Guidelines for CMP Transportation Impact Analysis, a regional CMP-level traffic analysis is not required for the proposed project since it would not add 50 or more weekday peak hour trips to the nearest CMP roadways/ramps, or 150 peak hour trips to the nearest CMP freeways. As a result, no impacts are anticipated.

<sup>108</sup> Arch Beach Consulting. *Traffic Impact Analysis [for the] Tentative Tract Map 72192, WC Homes. City of El Monte California.* August 14, 2014.

*C. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in the location that results in substantial safety risks? No Impact.*

The proposed project would not impact any Federal Aviation Administration (FAA) air traffic height restrictions. Finally, the project sites are not located within an approach or take-off aircraft safety zone. As a result, no impacts are anticipated.

*D. 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)? No Impact.*

Vehicular access to the proposed project and new surface parking lot would be provided from a new driveway on the east side of Bannister Avenue which would become a private street/cul-de-sac at 26 feet in width. No sidewalks proposed, and no parking would be permitted on both sides of the new private street. The existing public streets would remain unchanged. As a result no impacts are anticipated.

*E. Would the project result in inadequate emergency access? Less than Significant Impact.*

Vehicular access to the proposed project and new surface parking lot would be provided from a new driveway on the east side of Bannister Avenue which would become a private street/cul-de-sac at 26 feet in width. ~~No sidewalks are proposed and no parking would be permitted on both sides of the new private street. Bannister Avenue in front of the proposed project would be improved. A 5 foot dedication will also be provided along the project site's frontage with Bannister Avenue.~~ Currently, there is a permanent road-block (bicycle and pedestrian access is permitted) that obstructs vehicular traffic on Bannister Avenue. This obstruction is located mid-way between Star Street and Lambert Avenue, north and adjacent to the northern boundary of the proposed project. The new sidewalks on Bannister Avenue, project driveway and the private street would be designed to meet the City's design standards.

The City has determined that the roadway should be opened to facilitate emergency access between the northerly and southerly segments of Bannister Avenue. As a result, the existing barriers will be removed. In addition, improvements will be required to ensure the grade that is currently 7.8% meets the safety requirements of the Fire Department and Public Works Department. The project Applicant has also committed to improving (repaving and the installation of curb and gutters) the segment of Bannister Avenue that is currently a private street, to City standards. Other changes include the installation of a 3-way stop at the main project entryway with Bannister Avenue and a posted speed limit of 20 MPH for all of Bannister Avenue.

The proposed project would not impede emergency access to any neighboring properties during construction. At no time will Star Avenue, Lambert Avenue, Bannister Avenue and Maxson Road be closed to traffic during the project's construction. The LACFD will review the proposed cul-de-sac street which is further compounded by the existing obstruction just north of the project site. The final determination as to whether Bannister Avenue will continue to remain closed has yet to be made. However, the continued closure of Bannister Avenue or its re-opening is not directly related to the proposed project's implementation. However, the re-opening of the currently obstructed Bannister Avenue would mean that vehicles traveling to and from the project site could use the northern portion of Bannister Avenue since it would be a "through street." This would translate into 7 AM peak hour trips and 9 PM peak hour trips that

would potentially use that segment of Bannister Avenue, north of the project site. This volume of additional traffic would not affect any intersection LOS and the potential impacts will be less than significant.

*F. Would the project result in a conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? No Impact.*

There are three basic categories of pedestrian and bicycle facilities as defined by the City.

- *Class I Bikeway/Trails* involve designs which are completely separated from traffic lanes.
- *Class II Bike Lanes* are on-street paths that are located along the edge of a street with a striped lane denoting this bike path.
- *Class III Bike Lanes* also are located along a street edge, but are not striped. These paths are identified by street signs only.

There are continuous sidewalks along both sides of Bannister Avenue, except for an approximately 330 foot segment from the project driveway, south to where the existing sidewalks terminate. The proposed project would construct sidewalks on both sides of the street to connect with the project driveway. Currently, Lower Azusa Road, Cogswell Road, and Ranchito Street are designated as Class III Bike Boulevards. There is also a planned connection to the adjacent San Gabriel River Trail near Star Street (Durfee Elementary School). The San Gabriel River Trail provides regional pedestrian and bicycle access along the west side of the San Gabriel River.<sup>109</sup> There are three Foothill Transit bus routes in the project vicinity: Routes 178, 190/194, and 488.

- Route 178 travels along Lower Azusa Road with a stop on the south side of Lower Azusa Road, west of Durfee Avenue. When traveling eastbound, this route is destined to the Puente Hills Mall with stops in the City of Baldwin Park. When traveling westbound this route is destined to the El Monte Transit Station.
- Route 190/194 travels along Ramona Boulevard with stops on both sides of Ramona Boulevard, at Maxson Road. When traveling eastbound, this route is destined to Cal Poly Pomona, and when traveling westbound, this route is also destined to the El Monte Transit Station.
- Route 488 travels along Ramona Boulevard with stops on both sides of Ramona Boulevard, at Maxson Road (same stops as Route 190/194). When traveling eastbound, this route is destined to Citrus College and the City of Glendora, and when traveling westbound, this route is also destined to the El Monte Transit Station.<sup>110</sup>

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<sup>109</sup> Arch Beach Consulting. *Traffic Impact Analysis [for the] Tentative Tract Map 72192, WC Homes. City of El Monte California.* August 14, 2014.

<sup>110</sup>Ibid.

No bus stops are located along the project site's Bannister Avenue frontage. As a result, no bus-stops will be impacted by the proposed project. The proposed project will not significantly affect transit patronage. As a result, no impacts will result from the proposed project's implementation.

As indicated previously, the project Applicant has committed to improving (repaving and the installation of curb and gutters) the segment of Bannister Avenue that is currently a private street, to City standards. These improvements will also include the installation of sidewalks along the north and south sides of Bannister Avenue in front of the project site. The installation of the new sidewalks will enhance pedestrian safety in the immediate area of the project site. Other changes include the installation of a 3-way stop at the main project entryway with Bannister Avenue and a posted speed limit of 20 MPH for all of Bannister Avenue.

### **3.16.3 CUMULATIVE IMPACTS**

This scenario is comprised of the existing (2014) traffic conditions, plus two years of ambient traffic growth (2014 to 2016), plus traffic from cumulative (approved and/or pending) developments in the study area. A conservative ambient traffic growth rate of two (2) percent per year was applied to the existing (adjusted) traffic volumes to forecast up to Opening Year 2016. The growth rates in the LA County CMP indicate less than one percent annual growth in the San Gabriel Valley area.<sup>111</sup>

Cumulative development projects in the project vicinity were obtained from the City's *Economic Development and Redevelopment* website in July 2014. Appendix D of the Traffic Study contains the detailed information for the cumulative projects used in this TIA. There are no improvements planned for the study area roadways and intersections through the 2016 project opening year.

Therefore, the existing intersection traffic controls and geometrics were assumed for those intersections in the 2016 level of service analysis.

The trip assignments of the cumulative projects, and the ambient growth rate were applied to the existing (adjusted) traffic volumes which derived the Opening Year (2016) Baseline traffic volumes. As discussed above, Opening Year 2016 baseline traffic volumes were forecast by applying a conservative annual growth rate of two (2) percent per year, plus the addition of traffic from cumulative development. Based on the Traffic Study, the cumulative projects in the study area would generate a total of approximately 11,166 daily trips, 521 a.m. peak hour trips, and 981 p.m. peak hour trips. Those trips were distributed appropriately through the study area based on logical travel and commute corridors.<sup>112</sup>

### **3.16.4 MITIGATION MEASURES**

The Traffic Impact Analysis prepared for the proposed project indicated that no mitigation was required.

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<sup>111</sup> Arch Beach Consulting. *Traffic Impact Analysis [for the] Tentative Tract Map 72192, WC Homes. City of El Monte California.* August 14, 2014.

<sup>112</sup> Ibid.

### **3.17 UTILITIES IMPACTS**

#### **3.17.1 THRESHOLDS OF SIGNIFICANCE**

According to the City of El Monte, a project may be deemed to have a significant adverse impact on utilities if it results in any of the following:

- An exceedance of the wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- The construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts;
- The construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- An overcapacity of the storm drain system causing area flooding;
- A determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand;
- The project would be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs;
- Non-compliance with Federal, State, and local statutes and regulations relative to solid waste;
- A need for new systems, or substantial alterations in power or natural gas facilities; or,
- A need for new systems, or substantial alterations in communications systems.

#### **3.17.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

*A. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? Less than Significant Impact.*

Wastewater collection facilities that serve the City are owned, operated, and maintained by the City of El Monte Public Works Department. The City's present wastewater system includes a total of 135 miles of pipeline and six pump stations. El Monte is one of 17 jurisdictions that are signatory to the Joint Outfall Agreement. The agreement provides for a regional interconnected system of facilities and an inter-jurisdictional agreement to own, operate, and maintain sewers, pumping plants, treatment plants, and other facilities collectively called the Joint Outfall System. Wastewater treatment is provided to El Monte by the Sanitation Districts of Los Angeles County (LACSD) at three treatment plants. According to the City of El Monte General Plan EIR, an average medium to low density, single-family units generates a total of 260 gallons per day per housing unit. As indicated in Table 3-16, the future development is projected to generate 5,980 gallons of effluent on a daily basis.

**Table 3-16  
 Wastewater (Effluent) Generation (gals/day)**

Use	Unit	Factor	Generation
Single Family Residential	23 units	260 gals/unit	5,980 gals/day

Source: City of El Monte General Plan EIR

The proposed project will involve the installation of a new 8-inch gravity sewer line in the new private street. This new sewer line will serve the individual units. The new sewer line will connect to the existing 8-inch sewer line in Bannister Avenue. According to the project engineer, there is sufficient capacity in the existing sewer line to accommodate the demand. The proposed project will also involve the installation of a sewer pump to convey effluent from the residential units to the sewer main located within Bannister Avenue. This equipment will require periodic inspection by the City though the equipment maintenance will be the responsibility of the HOA. In addition, the age and size of the existing sewer main in Bannister Avenue will be sufficient in accommodating the projected flows according to the City Engineer.

The City is served by the Whittier Narrows Water Reclamation Plant, which has a capacity of 15 million gallons per day.<sup>113</sup> The increased generation of wastewater from the proposed project (5,980 gals per day) will not have a significant impact on current wastewater treatment facilities. Furthermore, mitigation measures provided in Section 3.9 will address any potential storm water run-off produced by the proposed project. As a result, the impacts are less than significant.

As discussed in Section 3.9, the developer will be required to control future runoff during construction and future occupancy through the use of best management practices (BMPs). These BMPs are included in the project Storm Water Pollution Prevention Plan and the Standard Urban Storm Water Management Plan (SUSMP) and must deliver runoff from the future developed site that will not cause a violation or exceedance of the Regional Board's standards. Therefore, the proposed project will not cause any wastewater treatment requirements to be exceeded. This equates to a less than significant impact.

*B. Would the project require 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 impacts? Less than Significant Impact.*

As indicated in Table 3-17 in the previous section, the future development is projected to generate 5,980 gallons of effluent on a daily basis. As indicated in subsection 3.17.2.A, the Whittier Narrows Water Reclamation Plant provides services for the City of El Monte. The Whittier Narrows Water Reclamation Plant has a total treatment capacity of 15 million gallons per day (MGD) and a residual capacity of approximately 7 MGD. The proposed project will not result in the remaining capacity being exceeded.

The proposed project will involve the installation of a new 8-inch sewer line in the new private street and pump station so as to convey the effluent to the existing sewer line located in Bannister Avenue. This new sewer line will serve the individual units and will connect to the existing 8-inch sewer line in Bannister

<sup>113</sup> Clearwater Program. *Wastewater Treatment Plants*. <http://www.clearwaterprogram.org/clearwater/default.asp>

Avenue. According to the project engineer, there is sufficient capacity in the existing sewer line to accommodate the demand. As a result, the impacts are less than significant.

*C. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? No Impact.*

As stated previously, the project Applicant included a storm water treatment chamber along the eastern side of the project site. In addition, new storm drains (and drainage easements) will be installed in the eastern part of the project site. Drainage for the area is primarily provided by the San Gabriel River and Rio Hondo River, two major flood control channels that flow northeast to southwest through the basin. Other, smaller flood control channels are tributary to both rivers and provide drainage for the areas surrounding El Monte. Throughout the City, stormwater drainage is carried by surface flow in the streets. Surface flows are carried to a series of interceptor storm drains to convenient discharge points on the Rio Hondo and San Gabriel River channels.

The Los Angeles County Flood Control District (LACFCD) has the regional, county-wide flood control responsibility. LACFCD responsibilities include planning for developing and maintaining flood control facilities of regional significance which serve large drainage areas. The District maintains the primary drainage channels that traverse El Monte. The City's local storm drainage system consists of 233 storm drains and 6 underpass pumps that are essential in alleviating flooding during periods of heavy rains. The City maintains the local drainage system and is also called on to assist in cleaning up hazardous spills on City streets so spills do not enter the storm drains or percolate into groundwater. As in most cities, minor local drainage problems are common, particularly where storm-water runoff enters culverts or goes underground into storm drains. Inadequate maintenance can also contribute to drainage problems and minor flood hazards.

The proposed project would be required to comply with all pertinent Federal Clean Water Act requirements. The proposed project would be subject to a General Construction National Pollutant Discharge Elimination System (NPDES) permit from the Regional Water Quality Control Board. The project itself would not result in a measurable increase in the amount of surface runoff. Finally, the proposed project will be required to comply with the City's Low Impact Development (LID) requirements.<sup>114</sup> As a result, the potential impacts would be less than significant. A new "V" drain will be installed along the project site's west property line to convey storm water runoff from those properties located to the west. The "V" drain will convey the water to an underground storm water treatment chamber that will be installed in the new street. These improvements will accommodate potential storm water flows and no impacts are anticipated.

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<sup>114</sup> LID is an approach to land development that promotes the use of "natural" solutions to manage stormwater runoff. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat stormwater as a resource rather than a waste product.

*D. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? Less than Significant Impact.*

As indicated previously, the San Gabriel Valley Water Company is responsible for providing domestic water service to the project area. Water mains are located within the existing public streets located adjacent to the project sites. The existing domestic water reservoirs that serve the area would continue to provide adequate supplies and pressure to serve the proposed project. The future consumption is projected to be 7,475 gallons of water on a daily basis according to the City of El Monte General Plan EIR (refer to Table 3-17). The proposed project will involve the installation of a new 8-inch water line in the new private street. This new water line will serve the individual units. The water new line will connect to the existing 6-inch line in Bannister Avenue.

**Table 3-17  
 Water Consumption (gals/day)**

Use	Unit	Factor	Generation
Single Family Residential	23 units	325 gals/unit	7,475 gals/day

City of El Monte General Plan EIR

According to the project engineer, there is sufficient capacity in the existing water line to accommodate the demand. In addition, the age and size of the existing water main will be sufficient in accommodating the projected flows according to the City Engineer. As a result, the impacts are less than significant.

*E. Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments? No Impact.*

The proposed project will involve the installation of a new 8-inch gravity sewer line in the new private street. This new sewer line will serve the individual units. The new sewer line will connect to the existing 8-inch sewer line in Bannister Avenue. According to the project engineer, there is sufficient capacity in the existing sewer line to accommodate the demand. The proposed project will also involve the installation of a sewer pump to convey effluent from the residential units to the sewer main located within Bannister Avenue. This equipment will require periodic inspection by the City though the equipment's maintenance will be the responsibility of the HOA.

No new off-site treatment facilities or expanded entitlements would be required since the residual treatment capacity for the Whittier Narrows Water Reclamation Plant is 7 million gallons per day. In addition, no upgrades to the existing off-site sewer lines would be required to accommodate the proposed use. Since no new off-site lines will be required, no impacts are anticipated.

*F. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs? Less than Significant Impact.*

El Monte is served by four waste management companies through nonexclusive franchise agreements. All four waste haulers—American Reclamation, Phoenix Waste and Recycling, Valley Vista Services, and Waste Management—provide waste collection and recycling services for the commercial sector. Valley Vista and Phoenix Waste provide curbside residential collection and recycling services. American Reclamation and Phoenix Waste collect and recycle trash from the multiple family residential (apartments, town-homes, etc.) developments. Valley Vista and Waste Management provide temporary roll-off services.<sup>115</sup>

**Table 3-18  
 Solid Waste Generation (pounds/day)**

<b>Use</b>	<b>Unit</b>	<b>Factor</b>	<b>Generation</b>
Single Family Residential	23 units	10 lbs/unit	230 lbs/day

The utility calculations are included in Appendix B.  
 Source: Blodgett/Baylosis Environmental Planning. 2014.

As indicated in Table 3-18, the proposed project is anticipated to generate 92 pounds of solid waste daily. As a result, the impacts are less than significant.

*G. Would the project comply with Federal, State, and local statutes and regulations related to solid waste? No Impact.*

The City is currently complying with AB 939 goals. Existing programs in the City for source reduction and recycling of solid waste include recycling, composting, household hazardous waste programs, source reduction, special waste materials programs (for instance, for tires and for concrete/asphalt/rubble), and a waste-to-energy program.<sup>116</sup> The proposed use, like all other development in the City, would be required to adhere to all pertinent ordinances related to waste reduction and recycling. As a result, no impacts on the existing regulations pertaining to solid waste generation would result from the proposed project’s implementation.

*H. Would the project result in a need for new systems, or substantial alterations in power or natural gas facilities? No Impact.*

Sempra Energy and SCG provide service upon demand, and early coordination with these utility companies would ensure adequate and timely service to the project site. Thus, no impacts on power and natural gas services would result from the adoption and subsequent implementation of the proposed project.

<sup>115</sup> City of El Monte (and Planning Center). *General Plan and Zoning Code Update and EIR Existing Conditions Report*. May 24, 2006.

<sup>116</sup>Ibid.

*I. Would the project result in a need for new systems, or substantial alterations in communications systems? No Impact.*

The proposed development would continue to require telephone service from various local and long-distance providers. The existing telephone lines in the area would continue to be utilized to provide service to future development. Thus, no impacts on communication systems are anticipated.

### **3.17.3 CUMULATIVE IMPACTS**

The potential impacts related to water line and sewer line capacities are site specific. The ability of the existing sewer and water lines to accommodate the projected demand from future development in the area would require evaluation on a case-by-case basis. As a result, no cumulative impacts on utilities would occur.

### **3.17.4 MITIGATION MEASURES**

The analysis of utilities impacts indicated that no significant impacts would result from the proposed project's implementation. As a result, no mitigation is required

### 3.18 MANDATORY FINDINGS OF SIGNIFICANCE

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

- The approval and subsequent implementation of the proposed project *would not* have the potential to degrade the quality of the environment, with the implementation of the recommended standard conditions and mitigation measures included herein.
- The approval and subsequent implementation of the proposed project *would not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals, with the implementation of the recommended standard conditions and mitigation measures referenced herein.
- The approval and subsequent implementation of the proposed project *would not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity, with the implementation of the recommended standard conditions and mitigation measures contained herein.
- The approval and subsequent implementation of the proposed project *would not* have environmental effects that will adversely affect humans, either directly or indirectly, with the implementation of the recommended standard conditions and mitigation measures contained herein.
- This Initial Study indicated there is no evidence that the proposed project would have an adverse effect on wildlife resources or the habitat upon which any wildlife depends.



## SECTION 4 - CONCLUSIONS

### 4.1 FINDINGS

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

- The approval and subsequent implementation of the proposed project *would not* have the potential to degrade the quality of the environment with the implementation of the mitigation measures included herein.
- The approval and subsequent implementation of the proposed project *would not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals, with the implementation of the mitigation measures referenced herein.
- The approval and subsequent implementation of the proposed project *would not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity, with the implementation of the mitigation measures contained herein.
- The approval and subsequent implementation of the proposed project *would not* have environmental effects that would adversely affect humans, either directly or indirectly, with the implementation of the mitigation measures contained herein.
- The Initial Study indicated there is no evidence that the proposed project would have an adverse effect on wildlife resources or the habitat upon which any wildlife depends.



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## SECTION 5 - REFERENCES

### 5.1 PREPARERS

BLODGETT/BAYLOSIS ENVIRONMENTAL PLANNING  
16388 E. Colima Road, Suite 206  
Hacienda Heights, California 91745  
(626) 336-0033

Marc Blodgett, Project Manager  
Teresita Bunya, Project Planner  
Liesl Sullano, Project Planner  
Bryan Hamilton, Project Planner

### 5.2 REFERENCES

Bugliarello, et. al., *The Impact of Noise Pollution*, Chapter 127, 1975.

California Administrative Code, *Title 24, Energy Conservation*, 1990.

California Department of Conservation, *Mineral Land Classification of the Orange County Area*, 1987.

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**SECTION 6 – COMMENTS ON THE IS/MND AND THE LEAD  
AGENCY’S RESPONSES  
(THIS ENTIRE SECTION HAS BEEN ADDED TO THE ORIGINAL  
DRAFT IS/MND)**

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**Letter Dated December 11, 2014**

**Dianna Watson**

**Branch Chief, Community Planning & I,D IGR Review**

**Department of Transportation**

**District 7 Office of Transportation Planning 100**

**S. Main Street, MS 16**

**Los Angeles, CA 90012**

**Comment 1.**

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project involves the demolition of the existing on-site improvements and the construction of 23 single-family units.

**Response 1.**

Comment noted for the record. No response is required.

**Comment 2.**

We would like to remind you any transportation of heavy construction equipments and/or materials which require the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods. In addition, a truck/traffic construction management plan may be needed for this project.

**Response 2.**

Comment noted. Construction traffic regarding the movement of heavy equipment and graded materials will be limited to off peak hours.

**Comment 3.**

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects need to be designed to discharge clean run-off water. Additionally storm water runoff is not permitted to discharge onto State highway facilities.

**Response 3.**

Comment noted. In the IS/MND, the Hydrology and Water Quality Section addresses the aforementioned concerns as it relates stormwater and clean water runoff.

CITY OF EL MONTE • MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY  
BANNISTER AVENUE PLANNED DEVELOPMENT • EL MONTE, CALIFORNIA

STATE OF CALIFORNIA—CALIFORNIA HIGHWAY RAN R

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION  
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
FAX (213) 897-1337  
www.dot.ca.gov



*Serious drought.  
Help save water!*

December 11, 2014

Mr. Jason Mikaelian  
City of El Monte  
Economic Development Department  
11333 Valley Boulevard  
El Monte, CA 91731

RE: Bannister Avenue Planned Residential  
Development  
Mitigated Negative Declaration  
SCH#2014111027, IGR#141129FL  
Vic. LA/ SR-605/ PM 21.1

Dear Mr. Mikaelian:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project involves the demolition of the existing on-site improvements and the construction of 23 single-family units.

We would like to remind you any transportation of heavy construction equipments and/or materials which require the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods. In addition, a truck/traffic construction management plan may be needed for this project.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects need to be designed to discharge clean run-off water. Additionally storm water run-off is not permitted to discharge onto State highway facilities.

If you have any questions, please feel free to contact me at (213) 897 – 9140 or project coordinator Frances Lee at (213) 897-0673 or electronically at [frances.lee@dot.ca.gov](mailto:frances.lee@dot.ca.gov).

Sincerely,

C.4 A handwritten signature in black ink, appearing to read "Dianna Watson".

DIANNA WATSON  
Branch Chief, Community Planning & I,D IGR Review

cc: Scott Morgan, State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

**Letter Dated December 10, 2014**

**Blanca Revelles**

**4344 N. Bannister Avenue**

**El Monte, CA 91732**

**Comment 1.**

It is worth noting that there was confusion as to the addresses being considered for development. The Notice of Community Meeting and the Study describe the project location as 4422 and 4436 Bannister Ave. This may appear unrepresentative in itself, unless you have some familiarity with the process and/or read into the detailed specifics of the document. For this reason, the project location was misunderstood by many of us in the impacted area. We did not know that a third parcel (8545-025-900 without an assigned address) was also being considered as part of the development process. The cumulative impacts of a 23-housing project at the proposed location, will pose considerable and unfavorable impacts on our neighborhood, even with the recommended mitigation measures.

**Response 1.**

Comment noted. There are two legal addresses, but three parcels within the site that were mentioned in Section 2 of the IS/MND. APN: 8545-025-900 was mentioned in the IS/MND. The third parcel is part of the project site that is zoned for public facilities. The Lead Agency made every effort to identify the potential and environmental impacts of the proposed 23-unit development. The analysis determined that no significant unmitigable impacts would result. For that reason, the Lead Agency determined that a Mitigated Negative Declaration would be required.

**Comment 2.**

The large-scale-development will degrade the character and historic features of our neighborhood. The existing neighborhood provides a rural atmosphere, comprised of large lots with two or three houses and several of the last remaining ranches—a reminder of El Monte's equestrian and agricultural heritage. The project will greatly impact the residents and displace many horses/livestock that currently reside on the existing homes.

**Response 2.**

The proposed project is consistent with the adopted General Plan Land Use Designation as it applies to the surrounding residential neighborhood. The number and density of units corresponds to that permitted under the current General Plan and Zoning Designations. In addition, the site is currently in a vacant state, and its replacement with new buildings and landscaping will improve the site's overall appearance. Therefore, the project will not adversely impact the character of the existing neighborhood.

The project is proposed to meet low density standards which permit the proposed density and height of the new homes. It may seem to residents that it is much denser than the current pattern of the neighborhood but by comparison a medium density designation at this site would have permitted up to 44 homes.

**Comment 3.**

The Study indicates that no protected species will be impacted. However, it will displace an abundant amount of wildlife and flower fields, including California White poppies that are still existent in the river and spill over to the horse trail and vacant school lot behind our homes.

**Response 3.**

Comment noted. The proposed project will not displace any protected wildlife. Any other wildlife species that remain on the project site will not be negatively impacted because they are species that are commonly found in urban environments. The proposed project will not extend to the river and the adjacent horse trail. The current horse trail along the San Gabriel River (below the embankment) varies in width and extends into the project site property in some areas. After development, the horse trail will be a consistent 11 feet in width, and this will be a reduction in some areas. The project will not extend into any publicly owned property along the river channel.

**Comment 4.**

The proposed development will significantly affect our family directly, negatively impact and disrupt our home/ranch. The two-story homes will block our scenic view of the San Gabriel Mountains, horse trails and riverbank.

**Response 4.**

The City's setback requirements require that the proposed units be setback a specified distance from neighboring properties. In addition, the residential units will be limited to two stories. Adherence to the City's setback requirements will protect the views for the neighboring homes. Furthermore, the City of El Monte Municipal Code does not include regulations that govern view shed protection.

**Comment 5.**

The concessions and yard setbacks being considered to facilitate the building of 23 new-houses will definitely impact our ability to maintain horses and livestock on our property. For example, the set back exception will place our horses within close proximity of the new houses. This could possibly mean that we will have to reduce the number of horses/livestock that can be maintained on our ranch. The new houses will overlook our horse area, this has the potential of generating complaints from the new neighbors that may not be used to farm activity, smells, and other living conditions associated with horses/livestock. Access to the equine trails and riverbank will also be lost as a result of the new development on Lot 8545-025-900. The Study does not mention the impact to the horse-riding trail or accesses to the trail. Analysis on this issue is important because the horse trail runs beneath the paved bike trail, parallel to the river channel. Potential impacts should be explored further.

**Response 5.**

The residents of the new development will acquire their units with the understanding that the neighboring properties involve the keeping of horses. The potential residents will not have any basis for complaint as long as the existing horse property is maintained pursuant to the City's code and property maintenance requirements. The current horse trail along the San Gabriel River (below the embankment) varies in width and extends into the project site property in some areas. After development, the horse trail will be a consistent 11 feet in width, and this will be a reduction in some areas. The project will not extend into any publicly owned property along the river channel.

**Comment 6.**

We need to know from the City, if the zoning changes and exceptions will impact our property and the ability to maintain the current level of equine/livestock that we are allowed on our yard. Given that the new houses will be closer to our horses, will it have an impact on rules/laws that are enforced by the Health Department, Animal Services and other entities that may negatively dictate upon our property if the zoning changes and exceptions requested by the developer are allowed.

**Response 6.**

Please refer to Response 5. It is true that if there are structures that have been constructed on school property without legal permit, then these structures will need to be removed. The code states that the keeping of horses is permitted on lots having an area of one-half acre (twenty-one thousand seven hundred eighty (21,780) square feet) or more, provided that the number of horses on any one lot shall not exceed one horse for every one quarter acre.

**Comment 7.**

The proposed development will significantly alter the existing drainage patterns of our property. We experience routine flooding problems during regular rain days. We experienced excessive flooding when the dam released water a few years back. We are very concerned that the proposed drainage alterations will create detrimental flooding and/or that the excess water runoff will overflow on our property thereby creating a severe hazard and exposing us to unnecessary liability. We don't think the mitigation measures recommended are sufficient to prevent flooding of our property. Also, of concern to us is the maintenance of the proposed drainage basins that will be built directly behind our back yard, this is substantiated by the reference in the study, it indicates that "...inadequate maintenance can also contribute to drainage problems and minor flood hazard".

**Response 7.**

The developer is required to ensure that the drainage for the existing properties will not be adversely impact by the new development. One example is the maintenance and improvement of a new "V" drain that will provide drainage to the properties located to the west of the project site. The installation of this "V" ditches will improve the overall drainage. The new laws that govern storm water runoff prohibit the diversion of surface runoff to adjacent properties. All surface runoff from the new units must be

maintained onsite. The drainage plans that were prepared for the project were also reviewed by the City of El Monte Public Works Department to ensure compliance with current regulations.

**Comment 8.**

Our existing fence will be removed; this will create a financial burden on us because we will need to put a new fence in the back yard. A new fence on our property line will be needed to keep our children, horses and pets from accessing the new development's drainage basins that will be directly behind their retaining wall between our properties. Any potential child and pet safety issues that may be associated with the type of drainage system that will be used should be appropriately addressed, i.e. can a child/pet's foot go through the grates, how much weight will it sustain—will it be enough for a horse to step on? etc. etc.

**Response 8.**

The existing fence that has been referred to in the above comment was placed outside of the property line of the home owner in question. Engineering details of the drainage ditch will be reviewed and approved prior to the issuance of Building Permits. The comment is correct that this fence will need to be moved so that it is in the owner's property.

**Comment 9.**

Primary access to the project site is through Lambert, which converts into Bannister. The unique configuration and limited access to the neighborhood deserves an actual real-time traffic analysis with adequate mitigation measures to ensure pedestrian safety.

**Response 9.**

A traffic study was prepared for the proposed project and is included in Section 3.1.6 of the IS/MND. The traffic study is also included in its entirety in the Appendix of the IS/MND. The traffic study was prepared specifically for this project which was used to establish professional methodology to determine any significant impacts. Lambert Avenue was considered in this analysis.

**Comment 10.**

The Study estimates that the new development would generate approximately 219 daily trips but only 17 trips during the morning peak hour traffic and 23 trips during the evening peak hour. These numbers do not seem realistic. Additional study should be required.

**Response 10.**

As indicated previously, an independent traffic study was prepared for the proposed project. The trip generation rates that were referred to in the above comment were derived from rates developed by the Institute of Transportation Engineers (ITE) 9<sup>th</sup> Edition. These rates are used in all traffic studies because they were independently derived through observation and surveys. The independent nature of the ITE rates has resulted in their widespread use in traffic studies.

**Comment 11.**

Bannister and Lambert have very few sidewalks. For the most part, the combined street sidewalks are fragmented and probably represent less than 1% of safe walking area. For all practical reasons the sidewalks cannot be used because there is a mixture of surfaces i.e. concrete, dirt, grass, etc. making it difficult to use the few sidewalks. Therefore, school children, pedestrians and joggers use the street instead. Additional traffic will increase hazards that jeopardize the safety of the children and residents that walk on Bannister and Lambert. Late evening and night walks will become even more unsafe because of limited lighting on those streets and the added traffic.

**Response 11.**

The existing conditions referred to in the comment will continue in the absence of the proposed project. The developer has agreed to improve the privately owned segment of Bannister Avenue so that it would include resurfacing and the installation of curb, gutters, and sidewalks.

**Comment 12.**

Currently, street parking is a major problem on Bannister. In recent years, the lack of street parking has progressively become problematic because many homes are comprised of large families with adult children who now have cars thereby increasing the parking needs of the neighborhood.

**Response 12.**

The proposed project meets the parking requirements outlined in the City of El Monte Off Street Parking Requirements. The project conforms to the City's off-street parking requirements with adherence to the concession permitted as part of the density bonus provisions. Each unit will provide a minimum of two enclosed parking spaces and two additional parking spaces within the driveway apron. A Home Owner's Association (HOA) will be established to ensure, among other things, which the off street parking requirements will be adhered to. In addition, the HOA will enforce those requirements that require the exclusive use of the garages for vehicle parking.

**Comment 13.**

The concession of parking reduction and no street parking for the proposed development will negatively impact the existing residents. The proposed new development should include a wider regular street inside the development complex to accommodate street parking on their private-internal-road. A designated visitor parking area should also be included as part of the mitigation measures for this project to assist with the current conditions of Bannister Avenue -- insufficient street parking.

**Response 13.**

According to the recommendations of the traffic impact analysis, each unit would be provided with 2 enclosed parking spaces for each unit and 2 additional spaces in the driveways. Under the applicable R-1B zone, 2 enclosed spaces within a garage are required for units with less than 2,000 square feet of floor area

while a 3-car garage is required for those units with a gross floor area that is greater than 2,000 square feet or with 4 or more bedrooms.

**Comment 14.**

The final determination as to whether the end of Bannister Avenue will reopen needs to be addressed prior to project approval. This issue is of great importance and impact to residents, pedestrians and traffic flow; residents would like this matter decided before moving forward with the proposed project.

**Response 14.**

The Fire Department determined that Bannister Avenue should be opened to facilitate emergency access between the northerly and southerly segments of the roadway. As a result, the existing barriers will be removed per the Fire Department's request. In addition, improvements will be required to ensure the grade that is currently 7.8% meets the safety requirements of the Fire Department and Public Works Department. The project Applicant has also committed to improving (repaving and the installation of curb and gutters) the segment of Bannister Avenue that is currently a private street, to City standards. This segment of Bannister Avenue will remain a private street.

**Comment 15.**

The Study indicates that the project site area is poorly maintained. As discussed at the Planning Meeting of December 3<sup>rd</sup>, the developer's property (4436 Bannister Ave), which consists of three houses has been vacant for over one year; those are the only houses that are blighted and have created a nuisance on Bannister. Therefore, it is a misrepresentation that the proposed project will contribute to the improvement of the area. Additionally, the modern architecture of the proposed development is not compatible with the existing ranches/homes.

**Response 15.**

The reference to site's conditions is noted in the IS/MND refers to the onsite conditions. The IS/MND was very specific in that these conditions apply to the project site. The comment is unclear as to how the new residential constructions will result in a negative impact given the variety of architectural styles that are currently found in the area.

**Comment 16.**

According to the Phase I Environmental Site Assessment, a site inspection was not conducted on 4422 Bannister Avenue and Parcel 8545-025-900. It further states that the evaluation did not include subsurface exploration, soil sampling, etc. etc. Therefore, it appears that further environmental assessments should be required. At a minimum, soil sampling. Also, since the proposed project is located in an area that is subject to liquefaction and will eventually require that specific study. For the benefit of, the residents and this neighborhood, the City of El Monte should require soil sampling and liquefaction studies on all three parcels prior to approving the project.

**Response 16.**

The reference to arsenic contamination was applicable to an area that was located within the former parking lot of the existing high school. The contamination was associated with a previous service station use. As part of the new expansion, this contamination was remediated with the removal of more than 950 tons of contaminated soil and two underground storage tanks. The Department of Toxic Substances Control (DTSC) was responsible for the oversight of the aforementioned cleanup. The DTSC subsequently determined that the remediation had been successful. A Phase 1 study, that included a site's inspection, was completed for the project site that indicated that no subsequent cleanup within the project site would be required. Soil sampling is required prior to the issuance of a building permit because of the import and recompaction of the site.

**Comment 17.**

The size and location of the proposed 23-housing project is NOT compatible with the City of El Monte General Plan objectives: Commit to restoring our natural environment and history; protect our neighborhoods from the impacts of urbanization; be compatible with culture, history and housing types of our residential neighborhoods; and, preserve the character and integrity of neighborhoods. The proposed project is an example of excess development and is not sustainable. We should not allow developers to transform our neighborhoods from Low Density to Medium or High Density. The development will divide an established community. Therefore, consideration should be given to reducing the number of units and the type of houses that will be allowed on this development site.

**Response 17.**

With the exception of the portion of the project site that is currently designated Public Facilities, the project site is designated R-1B. This zoning designation is the same as the surrounding residentially developed properties. The proposed project's use and density corresponds to that permitted under the City of El Monte General Plan. The project is proposed to meet low density standards which permit the proposed density and height of the new homes. It may seem to residents that it is much denser than the current pattern of the neighborhood but by comparison a medium density designation at this site would have permitted up to 44 homes. In fact, any future development within the site and surrounding area will likely conform to the required General Plan and Zoning.

**Comment 18.**

The special entitlements, concessions, waivers and PRD exceptions that are being afforded to the developer have in the past been denied to existing residents who have shown interest in developing their properties. The special considerations and density bonus options being proposed are not appropriate for this site nor do they benefit the City and its constituents.

**Response 18.**

Without knowing the details of the previous application, we cannot comment.

**Comment 19.**

I DO NOT SUPPORT the proposed development and believe that the MND study does not provide sufficient information to substantiate approval of the project.

I urge the City to deny the special entitlements and only approve a development that is compatible with the existing residences, 2-3 houses per lot.

**Response 19.**

Comment noted for the record.

Blanca Revelles  
4344 N. Bannister Avenue  
El Monte, CA 91732  
December 10, 2014

City of El Monte  
Economic Development Department  
Planning Division  
11333 Valley Blvd  
El Monte, CA 91732

RE: Mitigated Negative Declaration and Initial Study - Bannister Avenue Planned  
Development - November 10, 2014

In response to the proposed Bannister Development Study, the following concerns  
are in addition to those discussed at the Planning Division Community Meeting  
of December 3, 2014.

It is worth noting that there was confusion as to the addresses being considered for  
development. The Notice of Community Meeting and the Study describe the project  
location as 4422 and 4436 Bannister Ave. This may appear unrepresentative in itself,  
unless you have some familiarity with the process and/or read into the detailed specifics  
of the document. For this reason, the project location was misunderstood by many of  
us in the impacted area. We did not know that a third parcel (8545-025-900 without an  
assigned address) was also being considered as part of the development process. The  
cumulative impacts of a 23-housing project at the proposed location, will pose  
considerable and unfavorable impacts on our neighborhood, even with the  
recommended mitigation measures.

The large-scale-development will degrade the character and historic features of our  
neighborhood. The existing neighborhood provides a rural atmosphere, comprised of  
large lots with two or three houses and several of the last remaining ranches—a  
reminder of El Monte's equestrian and agricultural heritage. The project will greatly  
impact the residents and displace many horses/livestock that currently reside on the  
existing homes.

The Study indicates that no protected species will be impacted. However, it will  
displace an abundant amount of wildlife and flower fields, including California White  
poppies that are still existent in the river and spill over to the horse trail and vacant  
school lot behind our homes.

The proposed development will significantly affect our family directly, negatively impact  
and disrupt our home/ranch. The two-story homes will block our scenic view of the San  
Gabriel Mountains, horse trails and riverbank.

The concessions and yard setbacks being considered to facilitate the building of 23-  
new-houses will definitely impact our ability to maintain horses and livestock on our  
property. For example, the set back exception will place our horses within close

Mitigated Negative Declaration and Initial Study  
Bannister Avenue Planned Development

December 10, 2014

proximity of the new houses. This could possibly mean that we will have to reduce the number of horses/livestock that can be maintained on our ranch. The new houses will overlook our horse area, this has the potential of generating complaints from the new neighbors that may not be used to farm activity, smells, and other living conditions associated with horses/livestock. Access to the equine trails and riverbank will also be lost as a result of the new development on Lot 8545-025-900. The Study does not mention the impact to the horse-riding trail or accesses to the trail. Analysis on this issue is important because the horse trail runs beneath the paved bike trail, parallel to the river channel. Potential impacts should be explored further.

We need to know from the City, if the zoning changes and exceptions will impact our property and the ability to maintain the current level of equine/livestock that we are allowed on our yard. Given that the new houses will be closer to our horses, will it have an impact on rules/laws that are enforced by the Health Department, Animal Services and other entities that may negatively dictate upon our property if the zoning changes and exceptions requested by the developer are allowed.

The proposed development will significantly alter the existing drainage patterns of our property. We experience routine flooding problems during regular rain days. We experienced excessive flooding when the dam released water a few years back. We are very concerned that the proposed drainage alterations will create detrimental flooding and/or that the excess water runoff will overflow on our property thereby creating a severe hazard and exposing us to unnecessary liability. We don't think the mitigation measures recommended are sufficient to prevent flooding of our property. Also, of concern to us is the maintenance of the proposed drainage basins that will be built directly behind our back yard, this is substantiated by the reference in the study, it indicates that "...inadequate maintenance can also contribute to drainage problems and minor flood hazard".

Our existing fence will be removed; this will create a financial burden on us because we will need to put a new fence in the back yard. A new fence on our property line will be needed to keep our children, horses and pets from accessing the new development's drainage basins that will be directly behind their retaining wall between our properties. Any potential child and pet safety issues that may be associated with the type of drainage system that will be used should be appropriately addressed, i.e. can a child/pet's foot go through the grates, how much weight will it sustain—will it be enough for a horse to step on? etc. etc.

Primary access to the project site is through Lambert, which converts into Bannister. The unique configuration and limited access to the neighborhood deserves an actual real-time traffic analysis with adequate mitigation measures to ensure pedestrian safety.

The Study estimates that the new development would generate approximately 210 daily trips but only 17 trips during the morning peak hour traffic and 23 trips during the evening peak hour. These numbers do not seem realistic. Additional study should be required.

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Bannister and Lambert have very few sidewalks. For the most part, the combined street sidewalks are fragmented and probably represent less than 1% of safe walking area. For all practical reasons the sidewalks cannot be used because there is a mixture of surfaces i.e. concrete, dirt, grass, etc. making it difficult to use the few sidewalks. Therefore, school children, pedestrians and joggers use the street instead. Additional traffic will increase hazards that jeopardize the safety of the children and residents that walk on Bannister and Lambert. Late evening and night walks will become even more unsafe because of limited lighting on those streets and the added traffic.

Currently, street parking is a major problem on Bannister. In recent years, the lack of street parking has progressively become problematic because many homes are comprised of large families with adult children who now have cars thereby increasing the parking needs of the neighborhood.

The concession of parking reduction and no street parking for the proposed development will negatively impact the existing residents. The proposed new development should include a wider regular street inside the development complex to accommodate street parking on their private-internal-road. A designated visitor parking area should also be included as part of the mitigation measures for this project to assist with the current conditions of Bannister Avenue -- insufficient street parking.

The final determination as to whether the end of Bannister Avenue will reopen needs to be addressed prior to project approval. This issue is of great importance and impact to residents, pedestrians and traffic flow; resident would like this matter decided before moving forward with the proposed project.

The Study indicates that the project site area is poorly maintained and exhibits blight. As discussed at the Planning Meeting of December 3<sup>rd</sup>, the developer's property (4436 Bannister Ave), which consists of three houses has been vacant for over one year; those are the only houses that are blighted and have created a nuisance on Bannister. Therefore, it is a misrepresentation that the proposed project will contribute to the improvement of the area. Additionally, the modern architecture of the proposed development is not compatible with the existing ranches/homes.

According to the Phase I Environmental Site Assessment, a site inspection was not conducted on 4422 Bannister Avenue and Parcel 8545-025-900. It further states that the evaluation did not include subsurface exploration, soil sampling, etc. etc. Therefore, it appears that further environmental assessments should be required. At a minimum, soil sampling. Also, since the proposed project is located in an area that is subject to liquefaction and will eventually require that specific study. For the benefit of the residents and this neighborhood, the City of El Monte should require soil sampling and liquefaction studies on all three parcels prior to approving the project.

The size and location of the proposed 23-housing project is NOT compatible with the City of El Monte General Plan objectives: Commit to restoring our natural environment and history; protect our neighborhoods from the impacts of urbanization; be compatible with culture, history and housing types of our residential neighborhoods; and, preserve

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the character and integrity of neighborhoods. The proposed project is an example of excess development and is not sustainable. We should not allow developers to transform our neighborhoods from Low Density to Medium or High Density. The development will divide an established community. Therefore, consideration should be given to reducing the number of units and the type of houses that will be allowed on this development site.

The special entitlements, concessions, waivers and PRD exceptions that are being afforded to the developer have in the past been denied to existing residents who have shown interest in developing their properties. The special considerations and density bonus options being proposed are not appropriate for this site nor do they benefit the City and its constituents.

I DO NOT SUPPORT the proposed development and believe that the MND study does not provide sufficient information to substantiate approval of the project.

I urge the City to deny the special entitlements and only approve a development that is compatible with the existing residences, 2-3 houses per lot.

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**Letter Dated December 10, 2014**

**Christina Gomez**

**4334 Bannister Avenue**

**El Monte, CA 91732**

**Comment 1.**

This letter is a response and comment to the “Mitigated Negative Declaration and Initial Study” on the “Bannister Avenue Planned Development (4422 & 4436 Bannister Avenue. El Monte, California),” dated November 10, 2014, which is being facilitated and advocated for, on behalf of the developer (Don Cook, El Monte Homes LLC, W C Homes), by The City of El Monte. As expressed in the community meeting held on December 3, 2014, there are various areas of concern to the local property owners and constituents who will be impacted by the progression of the above proposed development.

**Response 1.**

Comment noted for the record.

**Comment 2.**

Issue must be taken with the initiation and development of the MND&IS itself. According to representatives at the Planning Division, the City of El Monte has been working continuously with the developer to facilitate this project for over a year. This implies that the City is advocating for the project with no consideration to the local, existing property owners' concerns. Valuable staff time and resources have already been expended over a long period of time to ensure that the project is approved without an equal opportunity for the community to provide input or express their concerns on the proposed project. One community meeting and insufficient staff with an inadequately sized room to accommodate all the meeting participants does not provide an equal amount of consideration to the community that is being impacted. Additionally, the lack of information on the City Council Agenda and subsequent rescheduling of the item to a Special Agenda, again, with an insufficient description, suggests questionable tactics in favor of the developer.

**Response 2.**

All development applications must be reviewed and processed by City Staff. Private property owners may elect to request a General Plan amendment, a Zone Change, or any other change to the existing land entitlement. This request by the property owner to consider a change in the entitlements does not guarantee that the request will be approved, and City staff does not offer a recommendation of approval or denial until all aspects of a project has been reviewed thoroughly. All development applications must be treated in a fair and a non-subjective fashion by City Staff.

**Comment 3.**

The MND&IS's proposed answers and solutions to its own questions are, in many cases subjective, in favor of the development project. An example is the issue of "Aesthetics." The report states that the loss of views

of the San Gabriel Mountains will have a "Less than Significant Impact" (p 32). However, since the development will be populated by 2-story homes, which will be placed above and at-level with existing 1-story homes, this is a point of view that clearly favors the new development. Additionally, the justification for stating that there will be "No Impact" by "substantially degrade[ing] the existing visual character or quality of the site and its surroundings" is a misrepresentation of the circumstances in favor of the developer (p 33). The justification given is that "the vacant, blighted, and un-maintained parts of the site" will be improved by the project, but what is not communicated is that the developer and School District have been allowed to perpetuate a blighted situation to provide a justification for the project (p 33). If the properties had been properly maintained and not allowed to become dilapidated, the facts could not be manipulated by the MND&IS to imply that the existing, surrounding property owners are the cause of the blighted situation by removing blame from the current owners of the properties in question. To claim that the development project is a solution to the conditions created by the developer and School District again disregards the surrounding property owners who have chosen to live and pay taxes in an area that contains rural and suburban charm, which is becoming scarce in the face of modern development.

**Response 3.**

The IS/MND in no way stated nor implied that the properties surrounding the project site were poorly maintained and blighted. The IS/MND makes every effort to avoid a subjective response with respect to the project's potential aesthetic impacts. For this reason, the zoning ordinance development standards are relied on to make a determination as to whether or not there is an impact. The potential units will conform to all pertinent development requirements related to building height, lot coverage, and other zoning standards. The three abandoned residences and the general maintenance of the property itself has contributed to an existing condition that will be remedied as part of the proposed development. As a result, the IS/MND determined that the proposed project would not result in any adverse aesthetic impacts. Finally, the City of El Monte Municipal Code does not contain any provisions related to the protection of views.

**Comment 4.**

The MND&IS does not address the issue of transforming a "Low-Density Residential" area into a High or Medium Density residential area (p 83). According to the "El Monte General Plan Land Use Policy Map," the areas of El Monte south of Ramona and South of Valley, between Peck and Durfee, are considered "Medium Density Residential." According to "The 2014 Guide to LA County Cities: Community Profiles," El Monte's median household income is \$42,041 with the average home sale price of \$300,000. Building high occupancy single-family homes will create a trend towards high-density residential areas, since demographics indicate that single families will not be able to afford homes that cost over \$500,000. Since the payments would be too high for the demographics, the evidence suggests that the large capacity, single-family dwellings will become detached multi-family homes – housing multiple families to make payments manageable. This situation will affect the MND&IS's anticipated residency exponentially. Instead of single-family occupancies, traffic and overcrowding will be the result of 23 homes containing multiple families in a condensed area that was not intended for residential use due to its current Public Facilities (PF) Zoning.

**Response 4.**

Conversions of this sort, done without comment, are prohibited by the Zoning Code and would be addressed by Code Enforcement procedures should it occur.

**Comment 5.**

The issue of traffic is an item that is of paramount concern to the residents as was expressed in the community meeting. When multiple families move into the proposed homes, the actual number of vehicles will be grossly underestimated by the MND&IS. Instead of 3 cars per household, the potential for 6 – 9 cars per household becomes a concern. This, in combination with the already limited parking on Bannister, absence of visitor parking within the development, and underestimation of garage/driveway parking is a combination for a traffic and safety hazard situation for the local residents. Additionally, it is well known by the local residents, as was stated in the meeting, that the curve at the transition between Bannister and Lambert and the straight-aways on each street leading to and from this curve are already a hazard in a "low-density" area (p 83). Adding 23 more homes that will be forced to use this portion of Bannister and Lambert as the only entrance and outlet is an unacceptable increase in additional traffic to an already hazardous situation.

**Response 5.**

As indicated previously, an independent traffic study was prepared for the proposed project. The trip generation rates that were referred to in the above comment were derived from rates developed by the Institute of Transportation Engineers (ITE) 9<sup>th</sup> Edition that are most commonly used by traffic engineers in traffic studies such as the one prepared for this project. These rates are used in all traffic studies because they were independently derived through observation and surveys. The independent nature of the ITE rates has resulted in their widespread use in traffic studies. The traffic analysis indicated that all the existing intersections in the area are currently operating at an "above acceptable" condition of LOS A, LOS B, or LOS C. In no case would the proposed project's traffic change the operating level of service to an LOS D. The analysis further found that the LOS would not change for the morning peak hour. The LOS for the evening peak hour would not change with the exception of Maxson Road and Lower Azusa Road. For this latter intersection, the LOS would change from B to C because the average delay time would decline by one second.

Each home in the project will have parking for four vehicles. There is no guest/visitor parking for single-family homes in the City of El Monte's Zoning Ordinance.

The traffic study concluded that there would not be any increased hazards at this location. However, the City may wish to review this curb situation to see if there are any improvements to be made. In addition, the recommended posted speed limit of 20 mph will also address the existing roadway hazards related to speeding vehicles.

**Comment 6.**

An aspect of the MND&IS that was particularly disturbing to the attending community members at the

meeting was the "methodology" utilized to determine "Existing [Traffic] Conditions" (p 142). Rather than using comprehensive data collection equipment and methods specific to the site (intersections) during the regular school year and over an extended period of time, an estimation was compiled from preexisting data sources and by non-specific means "in mid-July 2014 during a typical summer weekday" (p 142). A date for the data gathering was chosen that is representative of 1/4 the calendar year. This is during a time that school is not in session and families are taking vacations. A comprehensive study should be performed to provide an average of real data over a period of time (weeks or a month) during the school year, which represents 3/4 of the calendar year.

**Response 6.**

Existing traffic volumes were collected at the study intersections in mid-July 2014 during a typical summer weekday. There were four schools in the study area that were closed for the summer break: Durfee Elementary School to the north; La Primaria Elementary School and Fernando R. Ledesma Continuation High School to the south; and, Wright Elementary School to the west. Traffic related to those schools were estimated using trip rates from *Trip Generation, 9<sup>th</sup> Edition* (ITE), distributed on to the study area based on their assumed attendance boundaries, and added to the existing summer traffic volumes. This methodology is consistent with the protocols followed in the preparation of traffic studies where the baseline traffic counts were taken outside of school sessions. This approach also provides a "maximum" case estimate of baseline traffic volumes on local streets.

**Comment 7.**

Privacy and lighting conditions are other concerns expressed by residents at the meeting. The MND&IS addresses lighting only as a consideration as it relates to the actual development of the project. Post-development residential lighting impacts after the units are purchased and occupied are not an anticipated factor in the MND&IS. A 2-story development in a primarily 1-story residential area will create privacy issues for the existing property owners. Additionally, the assumptions that lighting will not be an impact due to mitigation measures to be implemented by the developer does not take into consideration the modifications that future property owners of the new development will make.

**Response 7.**

Sources of lighting in the area include lighting from buildings, the parking areas, commercial signage, and street lighting. Residential units that could be impacted by spillover lighting are located adjacent to the site. The perimeters of the project site would be surrounded by planted trees as part of the implementation of the proposed project. The following mitigation measures have been included in the IS/MND as a means to reduce the potential for light spillover:

- The Applicant shall ensure that all lighting meet the equipment and illumination standards of the City to the satisfaction of the Economic Development Department. The zoning code that pertains to the proposed project is 17.40.020.P, lighting systems, which states that for all sites serving three (3) or more dwelling units, the developer shall install an on-site lighting system in all parking areas, vehicular access ways and along major walkways. Such lighting shall be directed onto driveways and walkways within the project and away from dwelling units and adjacent properties.

Such lighting system shall be automated using either an electronic time switch device or photoelectric sensor device and the lighting device shall be equipped with vandal resistant covers. The Applicant must also submit an exterior lighting plan for review and approval by the Economic Development Department prior to the issuance of building permits.

- Light equipment shall be designed and installed so that light is directed away from light-sensitive receptors such as the nearby homes. In addition, light standards must be low (no more than 15 feet in height) to eliminate the potential for light trespass.

This will ensure that the proposed project's lighting does not spillover onto the adjacent lots. The homes immediately adjacent to the project, on the east side of Bannister, will likely have less privacy, although there will be an 8 foot high wall along with ample landscaping when trees have matured. A lighting plan is required prior to the issuance of a Certificate of Occupancy being issued.

**Comment 8.**

Environmental impacts should not be held to a minimum standard. Whenever development is promoted, there should be equal attention expended to promoting open, green space. Ignoring this aspect of community enhancement and preservation adds to the transition to a high-density population with fewer open, green spaces to enhance the quality of life for residents and property owners. Not considering this aspect of planning contradicts the "El Monte General Plan" and Goal LU-7.8 in reference to "River Frontage" to "improve adjacent residential neighborhoods" by "green[ing] the river banks along the San Gabriel River through the implementation of Emerald Necklace projects" (LU-33). Nurturing the equine trails is not only an opportunity to address environmental preservation as it relates to historical culture and wildlife in the area, but it is a symbiotic relationship intertwined in the drainage problem specific to the site under consideration. The sandy composition of the soil in the PF area in combination with the soft bottom design of The San Gabriel River contributes to higher water levels during rain events. Keeping the area free of development (concrete and limiting drainage) is vital to preventing increased liability and impact on the existing property owners. In relation to the soil, drainage is not the only issue.

**Response 8.**

The proposed residential development will be required to provide for landscaping and other amenities that would be required under the applicable Zoning Ordinance. The site plan calls for a landscaped linear strip including trees, along the project site's boundary with the San Gabriel River Trail. Additional landscaping will be provided along the Bannister Avenue frontage and in the private yard areas. Following development, the amount of landscaping will well exceed the amount currently provided within the project site.

The existing site conditions, with respect to drainage and surface runoff, will be improved with the installation of the new drainage infrastructure that is required as a part of the project's development. These new drainage improvements will ensure that surface runoff from the project site is maintained on the site and appropriately treated.

**Comment 9.**

I request that, in order to facilitate mitigation measures, a complete Environmental Impact Report is performed, inclusive of soil sampling. Only soil sampling can provide a true picture as to any contaminants that could possibly affect the local residents and environment. This step should be taken prior to the developer taking ownership of the complete project site as it contains public facilities and will therefore offer transparency prior to privatization. This is critical in protecting the residents as El Monte's proximity to various negative pre-existing environmental factors is an element to consider. The mining facilities located in the adjacent City of Irwindale are an air quality and particulate issue that has the potential to settle in the surrounding soil. The proximity to multiple major freeway interconnections (605, 10, 210, and the 60) creates a constant exposure to metals and emissions. The energy/power towers located along the 605 Freeway are known to expose residents to increased cancer risk factors. There may be reports that have navigated the bureaucratic process to claim that these projects individually pose "no/low impacts" to residents and the environment, but when viewed cumulatively, it is difficult to ignore common sense and the reality of the environmental hazards located in this specific area. Construction at a potentially contaminated site will add an additional environmental and health hazard to the already existing list of various exposures the community already experiences. The City needs to resist the temptation to fill every square inch of open space with additional homes. By preserving the larger residential lots from high-density development, not only will it create the potential for property values to soar in the future, as El Monte joins City's, such as, Arcadia, Glendora, and Covina in maintaining low-density residency, the City will also contribute to the preservation of our natural resources, such as, water.

**Response 9.**

The air emissions associated with the proposed project's construction and subsequent occupancy were thoroughly analyzed in the IS/MND. The comment that the City should not permit the development of underutilized or vacant parcels in the city is infeasible for El Monte to implement. Any privately owned property may be developed according to the corresponding General Plan and/or Zoning Designation. The City is not permitted to restrict development of a privately owned property pursuant to State planning law. Such a restriction would constitute inverse condemnation.

The Phase I environmental site assessment did not identify arsenic from the school site as a concern. The project team contacted the Department of Toxic Substances Control (DTSC) to ascertain whether the existence of the arsenic contamination could be confirmed. The site that was subject to the contamination was historically used as a gas station, an auto repair shop, and as a rail line. This area was previously a paved parking lot located at the Valle Lindo High School. The earlier site investigation detected elevated levels of arsenic. The DTSC developed a draft Removal Action Workplan (RAW) for the school site. This RAW addressed the removal and off-site disposal of contaminated soil at the site. The subsequent removal action resulted in the removal of approximately 940 tons of impacted soil and two remnant underground storage tanks.

The standards, or thresholds, are established by the State pursuant to CEQA. This project does not meet the required thresholds for the preparation of an EIR.

**Comment 10.**

The City is claiming to promote water conservation; however, with the transition to high-density residential areas, more water will be utilized. This project in particular will not only add more people to the area, but those people will be using more water resources. The proposed plan shows lawns being installed, which will take more water to maintain. If this project is allowed to progress, it should be altered to implement requirements to build self-sustaining homes. Landscaping should promote drainage, while simultaneously utilizing native, drought-resistant plants. Solar panels should be required. Electric vehicle charging stations should be included in the garages. To promote upward mobility of El Monte demographics, these types of requirements and a reduction in the project scope should be addressed to preserve open, green spaces and address drainage issues specific to this location. Preserving and enhancing the recreation horse trail is a project that can assist in addressing the quality of life that open spaces offer and help mitigate the project scope by enhancing the recreational options of El Monte.

**Response 10.**

Comment noted. The City is in agreement with the above comment stating that water conservation is a priority in the review of future development. The project will be required to conform to all pertinent requirements calling for energy and water conservation. The City of El Monte Zoning Ordinance does not require electrical charging stations for electrical vehicles. However, homeowners that use electrical vehicles will be able to utilize conventional electrical outlets provided in closed garages. This is not a high density project, but rather it is in line with lower density single family residential development standards. The proposed project will not extend to the river and the adjacent horse trail. The current horse trail along the San Gabriel River (below the embankment) varies in width and extends into the project site property in some areas. After development, the horse trail will be a consistent 11 feet in width, and this will be a reduction in some areas. The project will not extend into any publicly owned property along the river channel.

**Comment 11.**

The City cannot hide behind meeting bare minimum requirements for assessing a project's impact if the ultimate goal is to elevate the standard of living in El Monte. Holding major development projects up to a higher standard is essential in establishing a higher standard for the City as a whole. I am requesting that the critiques in this request be implemented by either denying the development or by holding the developer to a higher standard and reducing the scope of work. The local community residents should also be allowed equal time and staffing to address its concerns that the developer has been afforded. Additionally, I would like the City to provide me with a written response to how they are going to proceed with the issues I have outlined, in addition to any written public comment it has received, including all the concerns expressed by the constituents at the public meeting.

**Response 11.**

The City staff, in its review of the IS/MND, did not use arbitrary measures to identify a significant impact. The determination as to whether a significant impact would occur relied on quantitative or qualitative standards commonly used by other public agencies in the environmental review process. These standards

are not minimum standards established by the City, but rather are standards identified in Appendix G of the California Environmental Quality Act (CEQA). The Zoning Ordinance establishes regulations that govern various development requirements. These standards, whether minimum or maximum, are applicable to all development in the City.

No community meeting was required. Staff held a community meeting attended by 45 members of the public on December 3, 2014. The project hearing was then postponed until January 22, 2015 in order to consider community concerns from that meeting. This allowed an additional 7 weeks of review. The Mitigated Negative Declaration was revised to incorporate comments and responses, even though this is not required by CEQA.

Christina Gomez  
4334 Bannister Avenue  
El Monte, California 91732

December 10, 2014

City of El Monte  
Economic development Department  
Planning Division  
11333 Valley Boulevard  
El Monte, California 91731

To Whom It May Concern:

REQUEST FOR A WRITTEN RESPONSE TO COMMENTS ON THE BANNISTER AVENUE PLANNED DEVELOPMENT MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY (MND&IS).

This letter is a response and comment to the "Mitigated Negative Declaration and Initial Study" on the "Bannister Avenue Planned Development (4422 & 4436 Bannister Avenue, El Monte, California)," dated November 10, 2014, which is being facilitated and advocated for, on behalf of the developer (Don Cook, El Monte Homes LLC, W C Homes), by The City of El Monte. As expressed in the community meeting held on December 3, 2014, there are various areas of concern to the local property owners and constituents who will be impacted by the progression of the above proposed development.

Issue must be taken with the initiation and development of the MND&IS itself. According to representatives at the Planning Division, The City of El Monte has been working continuously with the developer to facilitate this project for over a year. This implies that the City is advocating for the project with no consideration to the local, existing property owners' concerns. Valuable staff time and resources have already been expended over a long period of time to ensure that the project is approved without an equal opportunity for the community to provide input or express their concerns on the proposed project. One community meeting and insufficient staff with an inadequately sized room to accommodate all the meeting participants does not provide an equal amount of consideration to the community that is being impacted. Additionally, the lack of information on the City Council Agenda and subsequent rescheduling of the item to a Special Agenda, again, with an insufficient description, suggests questionable tactics in favor of the developer.

The MND&IS's proposed answers and solutions to its own questions are, in many cases subjective, in favor of the development project. An example is the issue of "Aesthetics." The report states that the loss of views of the San Gabriel Mountains will have a "Less than Significant Impact" (p 32). However, since the development will be populated by 2-story homes, which will be placed above and at-level with existing 1-story homes, this is a point of view that clearly favors the new development. Additionally, the justification for stating that there will be "No Impact" by "substantially degrade[ing] the existing visual character or quality of the site and its surroundings" is a misrepresentation of the

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The MND&IS does not address the issue of transforming a "Low-Density Residential" area into a High or Medium Density residential area (p 83). According to the "El Monte General Plan Land Use Policy Map," the areas of El Monte south of Ramona and South of Valley, between Peck and Durfee, are considered "Medium Density Residential." According to "The 2014 Guide to LA County Cities: Community Profiles," El Monte's median household income is \$42,041 with the average home sale price of \$300,000. Building high occupancy single-family homes will create a trend towards high-density residential areas, since demographics indicate that single families will not be able to afford homes that cost over \$500,000. Since the payments would be too high for the demographics, the evidence suggests that the large capacity, single-family dwellings will become detached multi-family homes – housing multiple families to make payments manageable. This situation will affect the MND&IS's anticipated residency exponentially. Instead of single-family occupancies, traffic and overcrowding will be the result of 23 homes containing multiple families in a condensed area that was not intended for residential use due to its current Public Facilities (PF) Zoning.

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Environmental impacts should not be held to a minimum standard. Whenever development is promoted, there should be equal attention expended to promoting open, green space. Ignoring this aspect of community enhancement and preservation adds to the transition to a high-density population with fewer open, green spaces to enhance the quality of life for residents and property owners. Not considering this aspect of planning contradicts the "El Monte General Plan" and Goal LU-7.8 in reference to "River Frontage" to "improve adjacent residential neighborhoods" by "green[ing] the river banks along the San Gabriel River through the implementation of Emerald Necklace projects" (LU-33). Nurturing the equine trails is not only an opportunity to address environmental preservation as it relates to historical culture and wildlife in the area, but it is a symbiotic relationship intertwined in the drainage problem specific to the site under consideration. The sandy composition of the soil in the PF area in combination with the soft bottom design of The San Gabriel River contributes to higher water levels during rain events. Keeping the area free of development (concrete and limiting drainage) is vital to preventing increased liability and impact on the existing property owners. In relation to the soil, drainage is not the only issue.

I request that, in order to facilitate mitigation measures, a complete Environmental Impact Report is performed, inclusive of soil sampling. Only soil sampling can provide a true picture as to any contaminants that could possibly affect the local residents and environment. This step should be taken prior to the developer taking ownership of the complete project site as it contains public facilities and will therefore offer transparency prior to privatization. This is critical in protecting the residents as El Monte's proximity to various negative pre-existing environmental factors is an element to consider. The mining facilities located in the adjacent City of Irwindale are an air quality and particulate issue that has the potential to settle in the surrounding soil. The proximity to multiple major freeway interconnections (605, 10, 210, and the 60) creates a constant exposure

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to metals and emissions. The energy/power towers located along the 605 Freeway are known to expose residents to increased cancer risk factors. There may be reports that have navigated the bureaucratic process to claim that these projects individually pose "no/low impacts" to residents and the environment, but when viewed cumulatively, it is difficult to ignore common sense and the reality of the environmental hazards located in this specific area. Construction at a potentially contaminated site will add an additional environmental and health hazard to the already existing list of various exposures the community already experiences. The City needs to resist the temptation to fill every square inch of open space with additional homes. By preserving the larger residential lots from high-density development, not only will it create the potential for property values to soar in the future, as El Monte joins City's, such as, Arcadia, Glendora, and Covina in maintaining low-density residency, the City will also contribute to the preservation of our natural resources, such as, water.

The City is claiming to promote water conservation; however, with the transition to high-density residential areas, more water will be utilized, This project in particular will not only add more people to the area, but those people will be using more water resources. The proposed plan shows lawns being installed, which will take more water to maintain. If this project is allowed to progress, it should be altered to implement requirements to build self-sustaining homes. Landscaping should promote drainage, while simultaneously utilizing native, drought-resistant plants. Solar panels should be required. Electric vehicle charging stations should be included in the garages. To promote upward mobility of El Monte demographics, these types of requirements and a reduction in the project scope should be addressed to preserve open, green spaces and address drainage issues specific to this location. Preserving and enhancing the recreation horse trail is a project that can assist in addressing the quality of life that open spaces offer and help mitigate the project scope by enhancing the recreational options of El Monte.

The City cannot hide behind meeting bare minimum requirements for assessing a project's impact if the ultimate goal is to elevate the standard of living in El Monte. Holding major development projects up to a higher standard is essential in establishing a higher standard for the City as a whole. I am requesting that the critiques in this request be implemented by either denying the development or by holding the developer to a higher standard and reducing the scope of work. The local community residents should also be allowed equal time and staffing to address its concerns that the developer has been afforded. Additionally, I would like the City to provide me with a written response to how they are going to proceed with the issues I have outlined, in addition to any written public comment it has received, including all the concerns expressed by the constituents at the public meeting.

Sincerely,



Christina Gomez  
El Monte Constituent

**Letter Dated December 9, 2014**

**Roy Revelles**

**4338 N. Bannister Ave.**

**El Monte, CA 91732**

**Comment 1.**

Please be advised that I have read your Mitigated Negative Declaration Report for the Bannister Avenue Planned Development and find it to be incomplete and without sufficient substantive data that fully address Environmental, General Plan, Capital Improvement Plan, and Building and Safety Code concerns.

**Response 1.**

Comment noted for the record.

**Comment 2.**

Many of the issues were discussed at the community meeting held on December 3, 2014, at City Hall. At that meeting the City Planning staff was provided a written description of some concerns. Many residents and property owners were represented at this meeting and City staff promised to provide all those present a written response to our concerns, those requested in writing and those talked about at the meeting.

**Response 2.**

Comment noted. Written comments to the comments raised in the Community Workshop are provided in this section.

**Comment 3.**

Specifics addressing such details as:

Liquefaction zones and earthquake potential consequences as it relates to building codes and location of the proposed project; the lack of geological analysis and reluctance to discuss such prerequisites and the confidentiality conditions in the property purchase agreement about such analysis and inspection reports.

Increased density that negatively effect such resources as water supply, water pressure; increase of traffic making it difficult for emergency vehicles to navigate narrow streets, higher ratio of residents that reduce emergency response time and creating greater service loads, like sewer service and storm drains — high potential for flooding.

Environmental effects of and safety including air, noise, access to existing recreational amenities, threat to wildlife, security associate with homeless and drug activity on the river; safety to pedestrians and school children with the added traffic, etc. etc.

**Response 3.**

The project's impacts on geology and liquefaction were addressed in the IS/MND in Section 3.6. Exhibits are included in the section that indicates the location of the area subject to liquefaction. All new construction will be required to comply with the current California Building Code that has specific requirements related to ground shaking and liquefaction. The Flood Zone Map included in Section 3.9 indicates the project is outside of a designated flood zone. This information is provided through the Federal Emergency Management Agency's Flood Insurance Rate Mapping (FIRM) program. The other issues mentioned in the aforementioned comment (air, noise, wildlife) were analyzed in the IS/MND. As indicated by the project Applicant, as well as members of the surrounding area, the vacant buildings that occupy the site have been poorly maintained and have been occupied by transients.

The elimination of the existing buildings of the subsequent development of the project site will address the current problems related to vagrants and the site's maintenance. In addition, City staff has required the Applicant to undertake a twice weekly site visit to ensure the security of the property. This requirement is directly related to the community's concerns that were raised at the December 3, 2014 Community Meeting.

The installation of the new sidewalks associated with the proposed project's implementation will improve pedestrian safety for that segment of Bannister Avenue located along the project site's frontage.

**Comment 4.**

The above and many other factors were addressed previously. Unless all the points are dealt with responsibly prior to approval of the project, I cannot consider the full scope of the proposed project. The project has specific negative effects on my property that jeopardizes its full potential, the reason I bought it was for its agricultural use —horses, and my ability to maximize it. I also feel the size of the development will lower the property value because of environmental and code/zoning changes (waivers, entitlements, modifications, density) that are being adopted to accommodate the new development.

**Response 4.**

The proposed project will not preclude the neighboring property owners to use their properties pursuant to the applicable zoning and General Plan designations.

**Comment 5.**

At this juncture, I CANNOT SUPPORT THE PROJECT OR CONCUR WITH THE Negative Declaration in question.

**Response 5.**

Comment noted for the record.

Roy Revelles  
4338 N. Bannister Ave  
El Monte, CA 91732  
December 9, 2014

City of El Monte  
Economic Development Department  
Planning Division  
11333 Valley Boulevard  
El Monte, California 91731

Re: Public Continents In Connection With The Mitigated Negative Declaration and Initial Study  
For the Bannister Avenue Planned Development

Please be advised that I have read your Mitigated Negative Declaration Report for the Bannister Avenue Planned Development and find it to be incomplete and without sufficient substantive data that fully address Environmental, General Plan, Capital Improvement Plan, and Building and Safety Code concerns.

Many of the issues were discussed at the community meeting held on December 3, 2014, at City Hall. At that meeting the City Planning staff was provided a written description of some concerns. Many residents and property owners were represented at this meeting and City staff promised to provide all those present a written response to our concerns, those requested in writing and those talked about at the meeting.

Specifics addressing such details as:

Liquefaction zones and earthquake potential consequences as it relates to building codes and location of the proposed project; the lack of geological analysis and reluctance to discuss such prerequisites and the confidentiality conditions in the property purchase agreement about such analysis and inspection reports.

Increased density that negatively effect such resources as water supply, water pressure; increase of traffic making it difficult for emergency vehicles to navigate narrow streets, higher ratio of residents that reduce emergency response time and creating greater service loads, like sewer service and storm drains — high potential for flooding.

Environmental effects of and safety including air, noise, access to existing recreational amenities, threat to wildlife, security associate with homeless and drug activity on the river; safety to pedestrians and school children with the added traffic, etc. etc.

The above and many other factors were addressed previously. Unless all the points are dealt with responsibly prior to approval of the project, I cannot consider the full scope of the proposed project. The project has specific negative effects on my property that jeopardizes its full potential, the reason I bought it was for its agricultural use —horses, and my ability to maximize it. I also feel the size of the development will lower the property value because of environmental and code/zoning changes (waivers, entitlements, modifications, density) that are being adopted to accommodate the new development.

At this juncture, I CANNOT SUPPORT THE PROJECT OR CONCURE WITH THE Negative Declaration in question.

**Letter Dated December 3, 2014**

**The Property Owners and Residents of Bannister and Lambert Avenue**

**Comment 1.**

Be advised that the Property Owners and Residents of Bannister and Lambert Avenue find the City's Mitigated Negative Declaration does not contain sufficient substantive data, which supports approval of the proposed housing development. Our findings are:

**Response 1.**

Comment is noted for the record.

**Comment 2.**

The City has failed to justify the construction of 23 two-story homes that will negatively affect our neighborhood, culture and environment. The City of El Monte, in its report, targets approximately 350' of easement/private dirt road at the end of Bannister. The report references this area of our neighborhood as Urban and Blighted. For the most part our community is far from Urban. It is not in close proximity to any City or industrial, retail or governmental complex. The term was intended to dramatize the influence of the inner city and residential conditions.

**Response 2.**

The reference specifically applied to the proposed project site that is currently occupied by three vacant, dilapidated, residential structures with the remainder being largely underutilized. The project site and the surrounding area were described as being developed and the site's location is within a larger developed area.

**Comment 3.**

The term Blight was coined by the U.S. Department of Housing Urban Development. It defined Blight as conditions that demonstrated unsound, unsafe, unhealthy or dilapidated buildings. Density is also an important element. There is evidence that indicates elements of Blight do appear to be present and this point is made in the City's report. What the report does not reflect is that the housing element that fits the Blighted definition is in fact a problem caused by the Developer involved in the proposed project and the City of El Monte. The developer owns the three houses that are considered Blighted. Since the developer purchased these homes they have been left vacant and have taken on the appearance of being dilapidated. The City has the responsibility to prevent this kind of Blight from occurring. El Monte Municipal Code Section 8.60 provides the city a mechanism for preventing such a circumstance. The City has been aware that the houses have been vacant since the developer purchased the property.

**Response 3.**

Comment noted. The preparers of the IS/MND concur that only the project site in its present state is poorly maintained. At the community meeting, City Staff noted the community's concern regarding the site's general lack of maintenance and required twice weekly upkeep by the developer.

**Comment 4.**

The report references the demolition of certain structures in addition to the vacant houses at the riverside section of the proposed development. These structures contribute to the appearance of the Blight suggested by the City. Here again the School District, the owner of the parcel to be developed, allowed this public property to be used in its present fashion. The structures that house horses/livestock are still in use. Displacement and impact of this area is not addressed in the report.

**Response 4.**

The preparers of the IS/MND concur with the above statement concerning the condition of the project site. The land that is occupied by the horse stables are leases from the school district. The stables will be required to relocate at the conclusion of the sale of the property. Other improvements may be located on the school property without the current property owner's formal consent, and these are not legal structures. As such, they will be required to be removed.

**Comment 5.**

The City's report refers to the easement/private road at the end of Bannister Avenue as a street and that its appearance has a blighted effect. In the same breath the City indicates they have asked the Fire Department to consider the easement a "Public Safety Hazard" in order to establish legal cause/ authority, to forcibly install curbs, gutters, driveways and a street (will **EMINENT DOMAIN** be forced upon the owners/residents?). Residents on the improved section of Bannister Avenue have long indicated to the City that the dust and parking conditions should be looked into regarding the easement but we also recognize the property owners on this easement have long insisted in keeping their homes "country style", including the road. The road should not suddenly become an issue simply to accommodate the proposed development or a developer. The existing property owner should be the first consideration.

**Response 5.**

In the review of the project, the City has requested the Applicant to improve that segment of Bannister Avenue that has frontage along the project site and continuing further south. As indicated previously, this segment of Bannister Avenue is a privately owned street with ownership applied to the individual property owners that abut the street. Any future improvement to Bannister Avenue would require the permission of the individual property owners. The Applicant has indicated that should this permission be granted, they would improve Bannister Avenue with a new roadway surface, curbs, and gutters. The Fire Department has also indicated that the barrier that separates the northern and southern segments of Bannister Avenue be removed to facilitate emergency access. The revised site plan now shows the barrier being removed,

allowing a through street, with a 3-way stop sign at the project entrance. In addition, the posted speed limit along Bannister Avenue will be 20 MPH.

**Comment 6.**

The City's report indicates that the development will accommodate 132 vehicles. The immediate negative effect is to the unimproved section of Bannister Avenue, the properties adjacent to that easement/private road. The *additional* potential traffic represents almost a 300% increase in traffic for those residents. The increased traffic to the entire improved section of Bannister and Lambert Avenue is substantial. If the City as a whole is used as a comparison, the quantitative data gets saturated and does not accurately illustrate dimension or the serious consequences. The report does not account for traffic that will be generated by visitors to the new development; delivery, service vehicles and public resource vehicles (i.e. police, fire, mail, trash, etc.). No mitigating alternative is offered to address the traffic problem. Minimally, the City should address the opening of the easement/private road through to Star Avenue in the report. It would at least suggest that some of the traffic could be diverted and could positively influence the traffic problem. Traffic levels enumerated as a result of construction phase over ten months is understated.

**Response 6.**

Weekday daily, A.M. and P.M. peak hour trip generation estimates for the proposed project were developed using trip rates provided in the Institute of Transportation Engineers (ITE) Trip Generation, 9th Edition. According to the ITE rates, the proposed project would generate approximately 219 daily trips, 17 a.m. peak hour trips (4 inbound and 13 outbound), and 23 p.m. peak hour trips (14 outbound and 9 outbound). The traffic study indicates the level of service would not significantly change at any of the study intersections (refer to Table 3-15). Based on the Existing plus Project LOS analysis, all study area intersections would continue to operate with satisfactory LOS (LOS D or better) with addition of traffic from the proposed project. The trip generation rates used in the traffic study assumed total trip generation that included trips generated by residents and visitors. Other types of trips may include, but is not limited to, deliveries, etc.

**Comment 7.**

Pollution has serious implication. AQMD citywide data used by the City to illustrate that in their judgment there is no foreseeable health consequences to the residents is unacceptable. The emissions of an additional 132 vehicles to neighborhood may not be significant to the City as whole but to a concentrated area/neighborhood on a cul-de-sac, it has serious implications. The City's report failed to mention air borne pollutants generated by the rock queries, queries used as dump sites, the 605 freeway that runs parallel to Bannister and even more closely to the proposed development, Ramona Blvd.

**Response 7.**

The air quality analysis included in the IS/MND followed the methodology defined by the SCAQMD in the preparation of air quality studies for CEQA reports. The analysis utilized a computer model developed for the SCAQMD to estimate construction related and operational air emissions. The air quality analysis identified the projected emissions related to the proposed project's construction as well as those

anticipated to result once the development is occupied. The analysis determined that the air emissions would not exceed any thresholds that have been established by the SCAQMD.

**Comment 8.**

Noise hazards were not adequately considered. Like airborne hazards a noise forecast of after-built circumstances must be factored in as part of the analysis.

**Response 8.**

The comment is not specific in terms of the nature and extent of the deficiency in the analysis. Noise measurements were taken at the project site. The average noise levels at the measurement location in front of the project site along Bannister Avenue facing west was 66.2 dBA. The average noise level for the second measurement located in the same area but facing east was 67.5 dBA. As indicated in Section 3.16, the project would not result in a significant impact related to traffic noise since it typically requires a doubling of traffic volumes to register a perceptible change in noise levels. In addition, the proposed use would be required to comply with the City of El Monte Noise Control Ordinance. The project site is exposed to high levels of noise generated by the I-605 freeway and mitigation was identified in order to protect the future residents from the generation of excess noise.

**Comment 9.**

Pedestrian safety and traffic should have been given significant attention by the City in its report since there are no sidewalks on Bannister and Lambert Avenue.

**Response 9.**

No sidewalks are proposed and no parking would be permitted on both sides of the new private street. Bannister Avenue, in front of the proposed project, would be improved. A 5-foot dedication will also be provided along the project site's frontage with Bannister Avenue. Currently, there is a permanent road-block (bicycle and pedestrian access is permitted) that obstructs vehicular traffic on Bannister Avenue. This obstruction is located mid-way between Star Street and Lambert Avenue, north and adjacent to the northern boundary of the proposed project. The new sidewalks on Bannister Avenue, project driveway and the private street would be designed to meet the City's design standards. The project Applicant has also committed to improving (repaving and the installation of curb and gutters) the segment of Bannister Avenue that is currently a private street, to City standards. The existing barrier on Bannister Avenue prevents emergency vehicles from traveling unobstructed on this roadway. The removal of this barrier would facilitate emergency access and improve emergency response over the present condition. The installation of a 3-way stop at the project entry and a reduction in the posted speed limit to 20 MPH would result in traffic calming along the Bannister Avenue segments. Finally, the Applicant has agreed to install sidewalks along both sides of that segment of Bannister Avenue that is located west of the project site. The installation of these new sidewalks will enhance pedestrian safety over the existing condition.

**Comment 10.**

The actual Housing Development presents specific problems, such as: The use, need for or lack of existing resources to support the 32 additional housing structures. The Development has no sewer; it will rely on pumping all its waste up the Bannister Avenue sewer line including gray and drainage water. It's possible that the existing system may not have the capacity to handle the additional sewage or may require more maintenance, a cost that will be passed on to existing property owners. Water, electricity and gas utilities may also fit the same scenario. It is not clear how the City can recommend an increase demand of water resources when residents are currently rationing water. The City makes no recommendations to mitigate such an issue or address other environmental solutions like solar power, alternative desert landscape approaches, etc.

**Response 10.**

The Lead Agency acknowledges the current conditions with respect to the Statewide drought. Towards this end, the IS/MND indicated the proposed project will be required to adhere to all water conserving regulations that are designed to address the short fall. The analysis of utilities impacts is provided in Section 3.17 of the IS/MND. The review of the proposed project by the City engineer concluded that there is sufficient capacity and infrastructure to serve the site. Furthermore, the project site's development corresponds to that envisioned in the City of El Monte General Plan, which served as a baseline document for the Master Plan for sewer and water systems.

**Comment 11.**

The proposed retaining wall, drainage system between the wall and existing Bannister homes, influence on recreational facilities on top (bike and pedestrian trails) and below (horse back riding trails) the San Gabriel river channel presents liability issues for the current residents and new development. It influences many environmental changes that are not addressed in the City's report.

**Response 11.**

The maintenance of both the retaining walls and the drainage system will be the responsibility of the developer to install, and the responsibility of the HOA for the maintenance. There will be no liability on the adjacent property owners regarding the installation and maintenance of this infrastructure.

**Comment 12.**

The proposed development introduces a high density element to a neighborhood which may have long-term negative implication.

**Response 12.**

Comment noted for the record. As indicated previously, the proposed use and density of future development corresponds to the General Plan and Zoning Designations that applicable to the project site. The proposed project will conform to low density, single family residential development standards. The

project is proposed to meet low density standards, which governs the density and height of the new homes. It may seem to residents that it is denser than the current pattern of the neighborhood, but by comparison, a medium density designation at the site would have permitted the construction up to 44 homes.

**Comment 13.**

The project location sets off the development as a private "gated" community—an image that has no positive impact for the rest of the neighborhood.

**Response 13.**

The proposed project will not be gated.

**Comment 14.**

The proposed project will disrupt and degrade our neighborhood environment. The City's report does not reflect a meaningful concern for existing residents.

**Response 14.**

The project is proposed to meet low density standards which permit the proposed density and height of the new homes. It may seem to residents that it is much denser than the current pattern of the neighborhood but by comparison a medium density designation at this site would have permitted up to 44 homes. In fact, any future development within the site and surrounding area will likely conform to the required General Plan and Zoning.

Notice to the City of El Monte to Rescind  
It's Mitigated Negative Declaration and Initial Study dated November 10, 2014 for  
Bannister Avenue Planned Development.

Date: December 3, 2014

To: City of El Monte – Economic Development  
Department, Planning Division

Submitted By: The Property Owners and Residents  
Of Bannister and Lambert Avenue

Be advised that the Property Owners and Residents of Bannister and Lambert Avenue find the City's Mitigated Negative Declaration does not contain sufficient substantive data, which supports approval of the proposed housing development. Our findings are:

The City has failed to justify the construction of 23 two-story homes that will negatively affect our neighborhood, culture and environment. The City of El Monte, in its report, targets approximately 350' of easement/private dirt road at the end of Bannister. The report references this area of our neighborhood as Urban and Blighted. For the most part our community is far from Urban. It is not in close proximity to any City or industrial, retail or governmental complex. The term was intended to dramatize the influence of the inner city and residential conditions.

The term Blight was coined by the U.S. Department of Housing Urban Development. It defined Blight as conditions that demonstrated unsound, unsafe, unhealthy or dilapidated buildings. Density is also an important element. There is evidence that indicates elements of Blight do appear to be present and this point is made in the City's report. What the report does not reflect is that the housing element that fits the Blighted definition is in fact a problem caused by the Developer involved in the proposed project and the City of El Monte. The developer owns the three houses that are considered Blighted. Since the developer purchased these homes they have been left vacant and have taken on the appearance of being dilapidated. The City has the responsibility to prevent this kind of Blight from occurring. El Monte Municipal Code Section 8.60 provides the city a mechanism for preventing such a circumstance. The City has been aware that the houses have been vacant since the developer purchased the property.

The report references the demolition of certain structures in addition to the vacant houses at the riverside section of the proposed development. These structures contribute to the appearance of the Blight suggested by the City. Here again the School District, the owner of the parcel to be developed, allowed this public property to be used in its present fashion. The structures that house horses/livestock are still in use. Displacement and impact of this area is not addressed in the report.

The City's report refers to the easement/private road at the end of Bannister Avenue as a street and that its appearance has a blighted effect. In the same breath the City indicates they have asked the Fire Department to consider the easement a "Public Safety Hazard" in order to establish legal cause/ authority, to forcibly install

curbs, gutters, driveways and a street (will **EMINENT DOMAIN** be forced upon the owners/residents?). Residents on the improved section of Bannister Avenue have long indicated to the City that the dust and parking conditions should be looked into regarding the easement but we also recognize the property owners on this easement have long insisted in keeping their homes "country style", including the road. The road should not suddenly become an issue simply to accommodate the proposed development or a developer. The existing property owner should be the first consideration.

The City's report indicates that the development will accommodate 132 vehicles. The immediate negative effect is to the unimproved section of Bannister Avenue, the properties adjacent to that easement/private road. The additional potential traffic represents almost a 300% increase in traffic for those residents. The increased traffic to the entire improved section of Bannister and Lambert Avenue is substantial. If the City as a whole is used as a comparison, the quantitative data gets saturated and does not accurately illustrate dimension or the serious consequences. The report does not account for traffic that will be generated by visitors to the new development; delivery, service vehicles and public resource vehicles (i.e. police, fire, mail, trash, etc.). **No** mitigating alternative is offered to address the traffic problem. Minimally, the City should address the opening of the easement/private road through to Star Avenue in the report. It would at least suggest that some of the traffic could be diverted and could positively influence the traffic problem. Traffic levels enumerated as a result of construction phase over ten months is understated.

Pollution has serious implication. AQMD citywide data used by the City to illustrate that in their judgment there is no foreseeable health consequences to the residents is unacceptable, The emissions of an additional 132 vehicles to neighborhood may not be significant to the City as whole but to a concentrated area/neighborhood on a cul-de-sac, it has serious implications. The City's report failed to mention air borne pollutants generated by the rock queries, queries used as dump sites, the 605 freeway that runs parallel to Bannister and even more closely to the proposed development, Ramona Blvd.

Noise hazards were not adequately considered. Like airborne hazards a noise forecast of after-built circumstances must be factored in as part of the analysis.

Pedestrian safety and traffic should have been given significant attention by the City in its report since there are no sidewalks on Bannister and Lambert Avenue.

The actual Housing Development presents specific problems, such as: The use, need for or lack of existing resources to support the 32 additional housing structures. The Development has no sewer; it will rely on pumping all its waste up the Bannister Avenue sewer line including gray and drainage water. Its possible that the existing system may not have the capacity to handle the additional sewage or may require more maintenance, a cost that will be passed on to existing property owners. Water, electricity and gas utilities may also fit the same scenario. It is not clear how the City can recommend an increase demand of water resources when residents are currently rationing water. The City makes no recommendations to mitigate such an issue or

address other environmental solutions like solar power, alternative desert landscape approaches, etc.

The proposed retaining wall, drainage system between the wall and existing Bannister homes, influence on recreational facilities on top (bike and pedestrian trails) and below (horse back riding trails) the San Gabriel river channel presents liability issues for the current residents and new development. It influences many environmental changes that are not addressed in the City's report.

The proposed development introduces a high density element to a neighborhood which may have long-term negative implication.

The project location sets off the development as a private "gated" community—an image that has no positive impact for the rest of the neighborhood.

The proposed project will disrupt and degrade our neighborhood environment. The City's report does not reflect a meaningful concern for existing residents.

**E-Mail Dated December 11, 2014**

**Janye Iberri**

**4420 N. Bannister Avenue**

**El Monte, CA 91732**

**Comment 1.**

Thank you for allowing the homeowners to give feedback at the Dec. 3rd meeting. I know you were fervently taking notes and am wondering if the spoken concerns will serve as our individual/collaborative response as the deadline for comment is today.

**Response 1.**

Comment noted. Responses have been prepared for all of the letters and emails that were received concerning the IS/MND. In addition, comments received at the Community Workshop were responded to, and these comments and responses are included at the end of this section (Section 6).

**Comment 2.**

I would also appreciate the opportunity to discuss my options to keep horses on my property or adjacent area by lease renewal or the like. I paid \$400/mo. for years to lease the land that my horses are stabled on. We were completely deceived at the time of purchase, 1974, when we were told the property continued all the way back to fence that runs parallel and near bridle path. We were never able to resolve the issue because the realtor and sellers became impossible to locate.

**Response 2.**

The project that is presently envisioned for the property in question does not contemplate the keeping of horses within the property. In the event the subdivision map is approved, the individual parcels will not be sufficient in size that would permit the keeping of horses. Under the present zoning, a minimum of 1/2 acre is required for the keeping of horses. City staff examined the zoning information related to the keeping of horses. Their findings are summarized below:

*Keeping of horses on lots having an area of one-half acre (twenty-one thousand seven hundred eighty (21,780) square feet) or more, provided that the number of horses on any one lot shall not exceed one horse for every one quarter acre.*

The City staff then estimated acreage figures for the commentor's property and came up with this:

- 4410 (4414) Bannister Avenue (APN 8545-025-015) – 110 X 209 = 22,990 square feet (if there is a dedication this could reduce this total lot area). Two horses are permitted.
- 4408 (4400) Bannister Avenue (APN 8545-025-014) - 110 X 203 = 22,330 square feet (if there is a dedication this could reduce this total lot area). Two horses are permitted.

- No other lots on that side of Bannister have 1/2 acre.

**Comment 3.**

Thank you for reading some of my concerns and please consider the views related to homeowners' fears of excessively high density housing, traffic congestion, negative impact on our quality of life, etc., to be views I also share.

**Response 3**

The Lead Agency and the Preparers of the IS/MND appreciated all of the community input received during the review period.

**E-Mail Dated December 8, 2014**

**M. Pina**

**N. Bannister Avenue**

**El Monte, CA 91732**

**Comment 1.**

The lot shown as 4436 Bannister has a drive way on the north side of the "gate/slope." If the "gate/slope" will not be removed, why not enter on one side of the "gate/slope" and exit on the other. This would alleviate traffic on both sides of the "gate/slope."

**Response 1.**

The elimination of the gate will permit access from both the north and the south sides of Bannister for all the units. The revisions to the overall internal roadway cited in the comment would require the elimination of several units, while overall, the roadway level of service would not change.

**Comment 2.**

A better solution would be to flip the development so that the cul-de-sac backs onto Bannister Ave with the entrance at Ramona Blvd. This would require an easement to share a widened driveway with Ladesma School to Ramona Blvd.

**Response 2.**

A future vehicular access that would connect the project site to Ramona Boulevard is not feasible because of the existing school building that would obstruct this potential access.

**Comment 3.**

Eliminate one of the proposed units in the development near the entrance to provide for guest parking.

**Response 3.**

The proposed project meets the City's off-street parking requirements. In addition to the two enclosed spaces within the individual garages, additional parking is possible within the driveway aprons. Furthermore, on-street parking along Bannister Avenue by the future tenants will not be permitted.

## **COMMENTS FROM THE COMMUNITY MEETING (DECEMBER 3, 2014) AND THE LEAD AGENCY'S RESPONSES**

### **Comment 1.**

There are concerns regarding whether the new zoning will still allow the keeping of horses.

### **Response 1.**

The only portion of the project site that will be rezoned is that area that is presently owned by the school district. The school property and the balance of the project site will be rezoned to R-1B, the same zoning that is applicable to the surrounding properties. The proposed project site's rezoning will not preclude the keeping of horses on the adjacent properties. The keeping of horses is permitted within the R-1B Zone pursuant to the pertinent standards.

### **Comment 2.**

Bannister Avenue is congested due to school traffic.

### **Response 2.**

The *existing* school related traffic on Bannister (north and south of the existing gate) is generated by the existing homes. The proposed project will result in approximately 5 elementary school students, 3 middle school students, and 3 high school students. These enrollment rates were derived from student generation factors provided by the local school districts. Given the relatively close distance of the school to the project site, many of the future students will likely walk to school. This is especially true of the respective elementary school students that will attend Durfee Elementary School which is located next to the project site. This project will not add substantial traffic to existing school traffic.

### **Comment 3.**

There are crucial impacts regarding Bannister Avenue and its traffic and the impact of the removal of the gate.

### **Response 3.**

An independent traffic study was prepared for the proposed project. The trip generation rates that were referred to in the above comment were derived from rates developed by the Institute of Transportation Engineers (ITE) 9<sup>th</sup> Edition. These rates are used in all traffic studies because they were independently derived through observation and surveys. The independent nature of the ITE rates has resulted in their widespread use in traffic studies. The analysis of traffic indicates that the proposed 23 units will generate 219 daily trips. Of this total, 17 trips will occur during the morning peak hour and 23 trips will occur during the evening peak hour. The additional traffic will not measurably affect the level of service on nearby roadways or intersection.

The traffic analysis indicated that all the existing intersections in the area are currently operating at an “above acceptable” condition of LOS A, LOS B, or LOS C. In no case would the proposed project’s traffic change the operating level of service to an LOS D. The analysis further found that the LOS would not change for the morning peak hour. The LOS for the evening peak hour would not change with the exception of Maxson Road and Lower Azusa Road. For this latter intersection, the LOS would change from B to C because the average delay time would decline by one second.

**Comment 4.**

There are concerns regarding arsenic contamination.

**Response 4.**

A Phase I Environmental Site Assessment was completed as part of the school district’s disposal of its property. The reference to arsenic contamination was applicable to an area that was located within the former parking lot of the existing high school. The contamination was associated with a previous service station use. As part of the new expansion, this contamination was remediated with the removal of more than 950 tons of contaminated soil and two underground storage tanks. The Department of Toxic Substances Control (DTSC) was responsible for the oversight of the aforementioned cleanup. The DTSC subsequently determined that the remediation had been successful. A Phase 1 study was completed for the project site that indicated that no subsequent cleanup within the project site would be required.

**Comment 5.**

New homes are at a greater elevation. The citizens are concerned if the new housing will block the view of the mountains (affect the scenic vista).

**Response 5.**

Even though the units will be two stories, they will not exceed the development requirements for the City. The grade of the project site next to the three existing homes that have frontage along Bannister will essentially be the same. Following the site preparation, the grade of the project site will be equal to or less than, the grade of the existing lots located to the west of the project site. The new development will also be beneficial in that the existing conditions within the project site will be eliminated. In addition, the El Monte Municipal Code does not include any regulations related to view shed protection.

**Comment 6.**

The river has a dedicated horse trail by the County. The citizens are concerned that the equestrian trail will be removed.

**Response 6.**

According to the Los Angeles County Department of Parks and Recreation there are no county dedicated equestrian trails located in the City of El Monte. The Peck Road Water Conservation Park is the closest site

that contains multi-use trails. The proposed project will be limited to the current site that is fenced off and will not extend into the existing unofficial horse trail located along the west side of the bicycle trail. The current horse trail along the San Gabriel River (below the embankment) varies in width and extends into the project site property in some areas. After development the horse trail will be a consistent 11 feet in width, and this will be a reduction in some areas. The project will not extend into any publicly owned property along the river channel.

**Comment 7.**

In the IS/MND, the horse trail is not addressed.

**Response 7.**

Refer to Response 6.

**Comment 8.**

There are concerns regarding the new houses' impact upon the neighboring horses' ability to get water from the river.

**Response 8.**

The proposed project site is privately owned and the existing horse stables are located in that portion of the project site that is currently owned by the school district. There are no existing easements that provide access to the aforementioned trail.

**Comment 9.**

There was a concern that the two-story houses will block the view shed.

**Response 9.**

Please refer to Response 5.

**Comment 10.**

There was a concern that the horse trail will be removed.

**Response 10.**

Refer to Response 6.

**Comment 11.**

There was a general concern expressed regarding the public comment period was too short. He also wants to know if the review period can be extended.

**Response 11.**

The Planning Commission hearing has been rescheduled to January 22, 2015, and the Final MND will be available on January 12, 2015. The review process was expanded to provide an additional 7 week review.

**Comment 12.**

There was a concern that Durfee Elementary School will be impacted.

**Response 12.**

As indicated previously, the future 23 housing units will include approximately 5 elementary students. The School District did not indicate that the potential increase in enrollments would result in a significant impact. The proposed project will also be required to pay the pertinent development fees to the District.

**Comment 13.**

There was a concern that the project will change their quality of life for the worse.

**Response 13.**

Comment noted. The project will involve the removal of the existing conditions present within the site. Furthermore, the future zoning for the entire site will be the same as that applicable to the existing surrounding properties. The land use designation that will be applicable to the entire site (R-1B) is the same as that of the adjacent residentially developed properties. This will ensure that the future development is compatible with the surrounding area.

**Comment 14.**

There was a concern that property taxes will increase to accommodate the development.

**Response 14.**

The proposed project's implementation will not involve any reassessment of surrounding properties. The only change in the assessed evaluation will involve the proposed project site itself.

**Comment 15.**

Increasing traffic will negatively impact children walking to school.

**Response 15.**

As indicated previously, the proposed project will involve limited traffic impact in the area. The 23 units are anticipated to generate 17 trips during the morning peak traffic period and 23 trips during the evening peak hour period. In addition, the proposed project will, at a minimum, involve the installation of new sidewalks along the project's Bannister Avenue frontage. The Applicant has also agreed to the installation of new sidewalks along the opposite side.

**Comment 16.**

There are concerns regarding the traffic study that was conducted during the summer. It did not take into account the school year.

**Response 16.**

Existing traffic volumes were collected at the study intersections in mid-July 2014 during a typical summer weekday. There were four schools in the study area that were closed for the summer break: Durfee Elementary School to the north; La Primaria Elementary School and Fernando R. Ledesma Continuation High School to the south; and, Wright Elementary School to the west. Traffic related to those schools were estimated using trip rates from *Trip Generation, 9<sup>th</sup> Edition* (ITE), distributed on to the study area based on their assumed attendance boundaries, and added to the existing summer traffic volumes. As a result, school traffic was factored into the baseline traffic conditions.

**Comment 17.**

The curbs have no sidewalks.

**Response 17.**

As indicated previously, the proposed project will, at a minimum, involve the installation of new sidewalks along the project's Bannister Avenue frontage. The Applicant has also agreed to the installation of new sidewalks along the opposite side.

**Comment 18.**

Construction traffic will cause accidents.

**Response 18.**

Traffic signs will be posted to alert oncoming traffic as to the current construction road conditions. In addition, there will be flag men standing on the street directing traffic.

**Comment 19.**

There are concerns about privacy.

**Response 19.**

The IS/MND acknowledges that the proposed project will result in a change over the existing condition of the property. The project site, which includes three existing unoccupied homes and a largely vacant property that contains a horse stable, will be replaced by the proposed residential development. The project is consistent with the Zoning, both in terms of setbacks and building height. In addition, retaining walls and additional landscaping will be provided and will serve as ample privacy protection.

**Comment 20.**

There are concerns regarding easements.

**Response 20.**

There are no recorded easements that would impair the improvement and/or access to Bannister Avenue that is currently a privately owned street.

**Comment 21.**

There are concerns that the fire department sees the roadblock as a safety hazard.

**Response 21.**

The Fire Department has indicated that the “opening” of Bannister Avenue is required to provide an adequate emergency vehicle because of emergency response times.

**Comment 22.**

The document does not see sewers as a concern because they are not addressed. It was also commented that the sewers are old.

**Response 22.**

The Utilities section of the IS/MND was reviewed by the City Engineer. The City Engineer believes that the pipes have adequate capacity to accommodate future increases and that the age of the pipes is not a concern. The City Engineer was further contacted to ascertain whether the age of the water and sewer lines would be a problem. The City Engineer indicated that given the relatively modest flows, the proposed project would not accelerate or otherwise exacerbate any constraints.

**Comment 23.**

There are concerns about the payment for the improvements to the street and the sewer line. They are concerned about who will be the ones paying for it, if not themselves.

**Response 23.**

The developer will be required to fully fund any improvements that are directly related the proposed project's needs. Maintenance of the project-related improvements will be provided by the future HOA. Therefore, neighboring residents will not be responsible for funding the construction and maintenance of any and all street and utilities improvements designed to serve the proposed project. In fact, the developer has offered to improve Bannister Avenue at their own expense. The responsibility of the roadway's maintenance would continue to be the responsibility of the property owners.

**Comment 24.**

There are concerns that the City will charge them for the excess sewer generation and water consumption.

**Response 24.**

There will be meters incorporated into every unit which will keep track of that particular unit's utilities consumption. It is that particular unit's responsibility to pay all charges they incur. However, the sewer and water lines have adequate capacity to accommodate future generation consumption. They will not operate overcapacity, but if the instance occurs, no residents residing outside of the proposed project will have to pay more to accommodate the excess generation. Therefore, the proposed project will not impact utilities cost to those who do not reside within the new units.

**Comment 25.**

The study does not address parking.

**Response 25.**

The project Applicant will be required to adhere to all City standards regarding parking. As indicated in the IS/MND, each unit will be equipped with a 2-car garage and a driveway apron that will accommodate 2 additional cars. The parking required corresponds to the City's off-street parking requirements.

**Comment 26.**

There was a desire to make the roadway (Bannister Avenue) "bigger."

**Response 26.**

With regards to the private portion of Bannister, the developer has indicated a willingness to improve Bannister with new pavement, curbs, gutters, and sidewalks. Because this segment of the roadway is private, it would require the consent of the affected homeowners.

**Comment 27.**

The study does not address visitors, service vehicles, parking, etc.

**Response 27.**

Please refer to Response 25. The proposed project exceeds the City's parking requirements. All surplus parking will accommodate any and all visitors and service vehicle parking.

**Comment 28.**

There are concerns regarding traffic and noise issues.

**Response 28.**

Issues regarding traffic were covered in the Traffic section of the IS/MND. According to the traffic study that was provided to our staff, the proposed project will result in a generation of approximately 219 new daily trips with 17 AM peak hour trips and 23 PM peak hour trips. A rate of 9.5 trips per single family detached home was used. The project trip generation estimates were generated using trip rates provided by the Institute of Transportation Engineers (ITE). The traffic study also analyzed the impact the 219 new daily trips would have on six intersections in the vicinity of the project site. The proposed project will add no more than a half second delay for all 6 intersections studied. Construction vehicles will be clearly identified and must obey all local and State traffic laws. Traffic signs warning oncoming traffic regarding current construction will be in place for safety measures. In addition, dedicated flag men will be present on Bannister to assist with vehicular flow and access.

Once implemented, the proposed project will be required to adhere to all City noise laws. Construction must take place between the hours of 7 AM and 6 PM on weekdays and between the hours of 9 AM and 5 PM on Saturdays. No construction activities will be conducted on Sundays or Federal holidays. The Applicant must notify the nearby residents on Bannister Avenue as to the days and times of construction activities. In addition, signage will be placed on the construction security fences identifying a contact person citizens may call to complain about construction related noise issues. Lastly, the resulting trip generations during the proposed project's operational lifetime will not result in a significant traffic noise impact.

**Comment 29.**

No one will buy a citizen's property because property values will decrease.

**Response 29.**

The new development will not likely affect property values in the neighborhood because the new development will be an improvement over the existing site condition.

**Comment 30.**

The only ingress and egress to Durfee Avenue is Lambert Avenue.

**Response 30.**

The developer would not be able to address ingress and egress issues to Durfee Avenue. The City engineer and Planning Department will be better equipped to address these problems regarding access to Durfee Avenue.

**Comment 31.**

There is a blind corner present on the Durfee Avenue and Lambert Avenue intersection.

**Response 31.**

The proposed project will not exacerbate the existing condition related to this intersection's configuration. This is an existing condition that is independent of the proposed project.

**Comment 32.**

There are visibility concerns.

**Response 32.**

Refer to Response 31.

**Comment 33.**

There are concerns regarding pedestrian access.

**Response 33.**

The proposed project will involve the installation of a new sidewalk along both sides of Bannister Avenue thus improving pedestrian access along the project site's frontage.

**Comment 34.**

There are concerns regarding the chain of title for easements on the private road.

**Response 34.**

Refer to Response 20.

**Comment 35.**

The citizens were concerned about the seizing of property.

**Response 35.**

No residents will be subject eminent domain. Any improvements made to the street will require the consent of the residents whose property line abuts the private portion of Bannister Avenue which is a private street.

**Comment 36.**

There are concerns regarding cars driving down the dirt road if the street is not paved.

**Response 36.**

If the homeowners abutting the private portion of Bannister wish to maintain the road in its current state, cars will continue to drive down a dirt road.

**Comment 37.**

There are concerns of whether or not the development will have access to their private street.

**Response 37.**

The development will be restricted to just to the project site. The developer has no right to improve or seize any potential easements located throughout the private portion of Bannister unless given consent by the affected property owner.

**Comment 38.**

Some are not opposed to the project, but are concerned about the project density.

**Response 38.**

The proposed project will conform to low density, single family residential development standards. The project is proposed to meet low density standards, which governs the density and height of the new homes. It may seem to residents that it is denser than the current pattern of the neighborhood, but by comparison, a medium density designation at the site would have permitted the construction up to 44 homes. The land use designation that will be applicable to the entire site (R-1B) is the same as that of the adjacent residentially developed properties. This will ensure that the future development densities and uses are compatible with the surrounding area.

**Comment 39.**

The citizens do not want 23 units to use the private road (in front of the individual properties).

**Response 39.**

Comment noted for the record.

**Comment 40.**

There are concerns regarding the existing maintenance of the site and three vacant homes. Homeless people are living in the backyards of vacant houses.

**Response 40.**

On-site maintenance is an issue that will be addressed by the developer. In addition, any crime or suspicious activity should be reported to the El Monte Police Department. Once implemented, the proposed project will involve the demolition of the three existing vacant houses in the preparation of the site. The construction phase will remove any undesirable elements present on site. Security fencing will be placed around the construction site to prohibit any unauthorized access. The City is now requiring biweekly visits to the project site to ensure the property is adequately maintained.

**Comment 41.**

The houses are blighted.

**Response 41.**

Comment noted. Once implemented, the proposed project will remove all existing structures present on site.

**Comment 42.**

The developer is leaving the property blighted.

**Response 42.**

Comment noted. As indicated previously, any concerns requiring site maintenance should be raised to the developer.

**Comment 43.**

There are concerns regarding 24-hour security.

**Response 43.**

The proposed project will include a total of 23 single family detached units and will remove the existing vacant units. The City is now requiring the property owner to conduct biweekly visits to ensure that the site is maintained and is not occupied by transients.

**Comment 44.**

Traffic by Durfee Avenue is bad especially during the rain.

**Response 44.**

Comment noted. Since Durfee Avenue is not a through street, vehicles from the proposed development are not anticipated to go up Durfee Avenue. The proposed project will not significantly increase traffic in the surrounding area.

**Comment 45.**

Children have been killed.

**Response 45.**

Comment noted. The proposed project will not lead to any unsafe conditions for pedestrians. The project will involve the installation of sidewalks on one or both sides of Bannister Avenue which will improve pedestrian safety. If owners will allow Bannister to be improved, sidewalks will be installed there as well. This would actually improve pedestrian safety for both children and adults.

**Comment 46.**

There are requests to have construction avoid school hours.

**Response 46.**

Comment noted. Caltrans requested that construction traffic avoid the peak traffic periods. This requirement will be incorporated as a standard condition of approval for the CUP.

**Comment 47.**

There are concerns regarding major issues to traffic.

**Response 47.**

As indicated previously, the proposed project is anticipated to add 219 total daily trips, 17 AM peak hour trips, and 23 PM peak hour trips. In addition, the proposed project will not add more than a second delay to six of the intersections studied in is IS/MND.

**Comment 48.**

With the addition of 23 more units, there will be more children going to school, increasing the student generation.

**Response 48.**

As indicated in a previous comment, the student generation rate for the elementary school children would be around 5 students.

**Comment 49.**

As traffic becomes more congested, people will be making U-turns in property owners' driveways.

**Response 49.**

Comment noted. The proposed project's implementation will not likely lead to more people making U-turns on adjacent properties since the majority of the units will be located along the new private street.

**Comment 50.**

There will be congestion on Star Street.

**Response 50.**

As indicated previously, the proposed project is not anticipated to create significant traffic impacts. In addition, if Bannister opens up, much of these issues should be alleviated. The traffic analysis indicates the proposed project's impact to Star Street and the adjacent intersections. As stated in traffic study, no significant changes in the operating levels of service would result. With the reopening of Bannister Avenue, the proposed project would potentially result 7 morning peak hours trips and 9 evening peak hour trips using that segment of Bannister that connects with Star Street. This additional traffic volume will not result in any significant or measurable changes in the existing traffic conditions.

**Comment 51.**

Bannister Avenue will not be able to support the increase in traffic.

**Response 51.**

Bannister Avenue will be able to accommodate the increase in traffic because the proposed project is not expected to generate an excess in trip generation. This is based on the traffic study that was prepared for the proposed project by a certified traffic engineer.

**Comment 52.**

Bannister Avenue had been closed due to speeding vehicles.

**Response 52.**

As indicated previously, the installation of a 3-way stop at the project entrance and a posted speed limit of 20 MPH will be effective in reducing overall vehicle speed along this segment of Bannister Avenue.

**Comment 53.**

There are requests to not open the roadblock.

**Response 53.**

Comment noted.

**Comment 54.**

There are requests to leave the gate the way it is.

**Response 54.**

Comment noted. Please see Response 53.

**Comment 55.**

Some citizens expressed concerns regarding traffic backup if the gate remains closed.

**Response 55.**

As indicated previously, the proposed project is not expected to significantly increase traffic on Bannister Avenue.

**Comment 56.**

There are people on Bannister Avenue that need another outlet.

**Response 56.**

Bannister, as a through street, will improve overall site access compared to the existing condition.

**Comment 57**

There were concerns about the street being dangerous. One example was child fatalities because of speeding.

**Response 57.**

Refer to Response 52.

**Comment 58.**

There are desires to force the developer to create an alternative exit.

**Response 58.**

An alternative access is not feasible. There is single family development abutting the project site to the west that is not owned by the developer. In addition, Fernando R Ledesma High School, located to the south of the project site, completely restricts access to Ramona Boulevard. Lastly, there is not enough space located between the eastern edge of the property and the bicycle lane to accommodate the development of a new street. Ramona Boulevard will not be able to support a new ingress and egress because Ramona Boulevard becomes a bridge adjacent to the high school.

**Comment 59.**

There was a concern that Bannister Avenue remain a private road.

**Response 59.**

Whether or not the road remains private or becomes public is a separate matter and is beyond the scope of this project.

**Comment 60.**

A citizen expressed wanting the project to die and the City should give up because of the concerns that were raised.

**Comment 61.**

There were concerns about “boxing” in horse properties with a twelve foot wall.

**Response 61.**

The proposed project will not preclude the keeping of horses within those adjacent properties where such activities are permitted under the current zoning. In addition, the *maximum* height of the project site’s walls will be 8 feet though the height will vary around the project.

**Comment 62.**

There were concerns regarding horse setbacks.

**Response 62.**

Please see Response 61.

**Comment 63.**

There were concerns regarding drainage issues.

**Response 63.**

The proposed project will be adequately drained since there will be 10 inch drainage easements located adjacent to the single family detached units, along the east side of the site. New water pipes will be constructed underneath the private internal roadway. In addition, storm water treatment chamber to facilitate percolation will be installed along the project site's east boundary. The installation of the drainage improvements will translate into an improvement compared to the existing on-site conditions.

**Comment 64.**

There were concerns about having to create ditches to retain flooding on the street.

**Response 64.**

The developer would be able to address this issue if permission is given by the affected residents to improve Bannister Avenue. If Bannister Avenue were to remain in its current state, problems regarding ponding may persist. The proposed project is required to retain surface runoff within the property, and the on-site storm drain system will convey water into an underground treatment chamber. As a result, storm water runoff that would be conveyed onto Bannister Avenue will be minimal. As indicated previously, the installation of the drainage improvements will translate into an improvement compared to the existing on-site conditions.

**Comment 65.**

There were additional concerns about utilities, especially regarding old pipes.

**Response 65.**

Please see Response 22. The City Engineer reviewed the Utilities Section of the IS/MND and was not concerned about the carrying capacity and age of the pipes.

**Comment 66.**

There were concerns regarding ground water.

**Response 66.**

Construction of the proposed project will not deplete or disturb a local aquifer. In addition, water runoff will flow to a new water treatment chamber which will recycle the water and facilitate percolation.

**Comment 67.**

The adjacent sewer main is not big enough his 3 unit Planned Unit Development (PUD) that he proposed.

**Response 67.**

We do not know how the City responded to the aforementioned application and why such a conclusion was raised. However, this is an entirely different project, and the City staff and the Project Engineer evaluated the proposed project's impacts to sewage generation and the existing sewer lines are well prepared to accommodate excess generation.

**Comment 68.**

There were concerns regarding arsenic in the soil.

**Response 68**

Phase I site assessment was provided by Athanor Environmental Services Inc. The Phase 1 indicated that there was no evidence found to indicate that hazardous waste was disposed on the subject property. In addition, since the property that is suspected of arsenic contamination is a school site, they would have been required to notify State and Federal authorities. The reference is related to a school parking lot that was previously occupied by a service station. This condition was remediated through DTSC oversight.

**Comment 69.**

There were concerns regarding whether or not soil sampling was utilized.

**Response 69.**

Please refer to response 68.

**Comment 70.**

The school has an EIR that identifies arsenic as a risk factor.

**Response 70.**

Please refer to response 68.

**Comment 71.**

The citizens desire a soil sample.

**Response 71.**

Comment noted. Please refer to response 68.

**Comment 72.**

The project affects people on Lambert Avenue.

**Response 72.**

As stated previously, the project will not generate a substantial influx of traffic on Lambert Avenue.

**Comment 73.**

There were concerns about crime.

**Response 73.**

The issues of the three vacant houses being a magnet for crime have been noted. It is the responsibility of the developer to maintain the project site and to take the necessary measures to prevent trespassing and criminal activity from taking place on site. Once the attractants (vacant buildings, etc) for vandalism and vagrancy are removed, the proposed project will not increase criminal in the area. In addition, the City is now requiring the Applicant to conduct biweekly site visits to ensure the site is properly maintained and to eliminate vagrancy and vandalism.

**Comment 74.**

A citizen wanted to know why exemptions haven't been granted for her property.

**Response 74.**

The issue regarding this particular person's request for planning/building related exemptions is independent from the proposed project, and it is an issue that should be raised to the City itself. The City staff examines each project and request on a case by case basis. The exemptions that are being requested by the developer are discretionary actions, which may only be implemented upon the approval of the Planning Commission and City Council.

**Comment 75.**

There were concerns regarding wildlife which included peacocks, chickens, hawks, etc.

**Response 75.**

Under CEQA, impacts to special status species must be examined in the Biological Resources section. There are no threatened, endangered, or local special status animals located on site or in the surrounding areas. In addition, there are no trees protected under the City's Tree Preservation ordinance present on site. Any animals that may be present on site are either introduced non-native species, or are species that are not of special status. The animals present on site will likely relocate accordingly with the assistance of animal control.

**Comment 76.**

There were requests to extend the public review.

**Response 76.**

The review period was extended. The Planning Commission meeting is now scheduled for January 22, 2015.

**Comment 77.**

The citizens expressed questions on why the document stated the site was urban instead of suburban.

**Response 77.**

Comment noted. The IS/MND acknowledged the developed character of the site and surrounding area.

**Comment 78.**

This type of development will not be tolerated in Arcadia, Glendora, etc.

**Response 78.**

Comment noted for the record.

**Comment 79.**

The study is generic.

**Response 79.**

The environmental consulting staff tried to address every section in a meaningful way. The environmental analysis was tailored to this specific project at the specific location identified in the preliminary site plans and City applications. In addition, extra steps were taken to ensure the quality and accuracy of the document. The IS/MND went through multiple peer reviews organized by the City. City staff also reviewed the document multiple times for quality control and to provide staff input.

**Comment 80.**

The citizens desire the study to look at the impacts to the existing neighborhood.

**Response 80.**

The IS/MND examined the potential impacts to not only the future residents, but also to the existing neighborhood.

**Comment 81.**

There needs a certain distance to make a cul-de-sac in the private road.

**Response 81.**

The Fire Department will review the site plan to ensure that sufficient turn-around room is provided and the hydrant spacing meets code requirements.

**Comment 82.**

There were concerns that the existing home owners will experience liability.

**Response 82.**

The proposed project's implementation, including the proposed improvements to Bannister Avenue, will not affect the liability of the adjacent homeowners. The roadway will continue to remain under private ownership and any improvements that will be made must be done so with the individual property owner's consent.

**Email Dated January 8, 2015**

**Roy Revelles**

**4338 N. Bannister Ave.**

**El Monte, CA 91732**

**Comment 1.**

Could you tell me what the status is regarding the proposed Bannister Housing Development Project?

**Response 1.**

It is scheduled for public hearing on January 22, 2015. Public notices will be mailed out today.

**Comment 2.**

Does the City have an Application submitted by the owner or some legal instrument that allows the Buyer to initiate of the Development Process?

**Response 2.**

We are reviewing your previous email on this subject. I can let you know more once we are done reviewing internally.

**Comment 3.**

Has the Planning Staff completed its response to the list of resident concerns raised about the “draft” Negative Declaration?

**Response 3.**

Yes, this was completed by the environmental consultant (who spoke at the meeting) as part of the revised MND and this document will be available on Monday, January 12.

**Comment 4.**

There to, it was understood that the Planning Department would respond in writing to the residents present at the City’s meeting held several weeks ago and before any other action was taken or meeting conducted. Further, you must be aware by now that Mr. Hodson has found the contaminated soil data. The City should have some kind of permit process that not only allowed for the removal of the hazardous material, the transporting of such material on City of El Monte Streets but other data relating to the inspections during construction of the high school. This latter is an environmental and a Public Health concern. The City and the School District are now clearly aware. Both Public Agencies have a greater responsibility (more stringent standards) for the health and welfare of the Public. This information should be disclosed to the buyer/developer and the tenants currently using the parcel(s) that are part of the

proposed development. I would think that the Negative Declaration must also recognize the contaminated soil issue and reflect on the previous and potential problems.

**Response 4.**

The environmental consultant did more work on this issue and the answers to this are included in the revised MND.

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## **APPENDICES**

**APPENDIX A – TRAFFIC STUDY**

**APPENDIX B - NOISE MEASUREMENT ANALYSIS**

**APPENDIX C - AIR QUALITY (CALEEMOD) WORKSHEETS**

**APPENDIX D – PHASE I HAZARDOUS MATERIALS AND HAZARDS  
ASSESSMENT**

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## **APPENDIX A - TRAFFIC STUDY**

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# TRAFFIC IMPACT ANALYSIS



TENTATIVE TRACT MAP 72192

WC HOMES

City of El Monte, CA

**arch beach**  
CONSULTING

August 14, 2014

## TRAFFIC IMPACT ANALYSIS

### TENTATIVE TRACT MAP 72192 WC HOMES

City of El Monte, California

*Prepared by*



Project No. 14-026  
August 14, 2014

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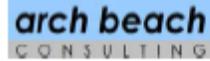
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- Appendix A – Raw Traffic Volume Count Sheets
- Appendix B – Existing Traffic Volume Adjustment Worksheets
- Appendix C – Intersection Level of Service Worksheets
- Appendix D – Cumulative Projects Traffic Data



## 1.0 INTRODUCTION

The following presents the Traffic Impact Analysis (TIA) prepared by Arch Beach Consulting for a proposed 23 dwelling unit (DU) single-family detached home development (proposed project) along the west side of the San Gabriel River in the eastern side El Monte (City). The proposed project site sits on a mostly vacant 3.16 acre parcel with some agricultural uses between Bannister Avenue and the San Gabriel River. The project site is bounded by single-family homes to the north and south; the San Gabriel River Trail and River to the east; and, single-family homes and Bannister Avenue to the west.

This TIA has been prepared consistent with the requirements of the City's Public Works Department, the Los Angeles County *Traffic Impact Analysis Report Guidelines* (1997), and application provisions of the California Environmental Quality Act (CEQA). The Lead Agency of the proposed project is the City of El Monte.

### **Purpose and Objectives of the Traffic Study**

The purpose of this traffic study is to evaluate the traffic and circulation impacts of the proposed project. The study objectives of this traffic study include:

- Documentation of existing traffic conditions and future traffic conditions corresponding to the "Existing plus Project" scenario (consisting of existing year 2014 plus project conditions), and "Opening Year" (2016 consisting of existing plus ambient growth plus cumulative projects).
- Determination of additional circulation system features and system management actions needed to achieve the City's levels of service requirements with implementation of the proposed project.

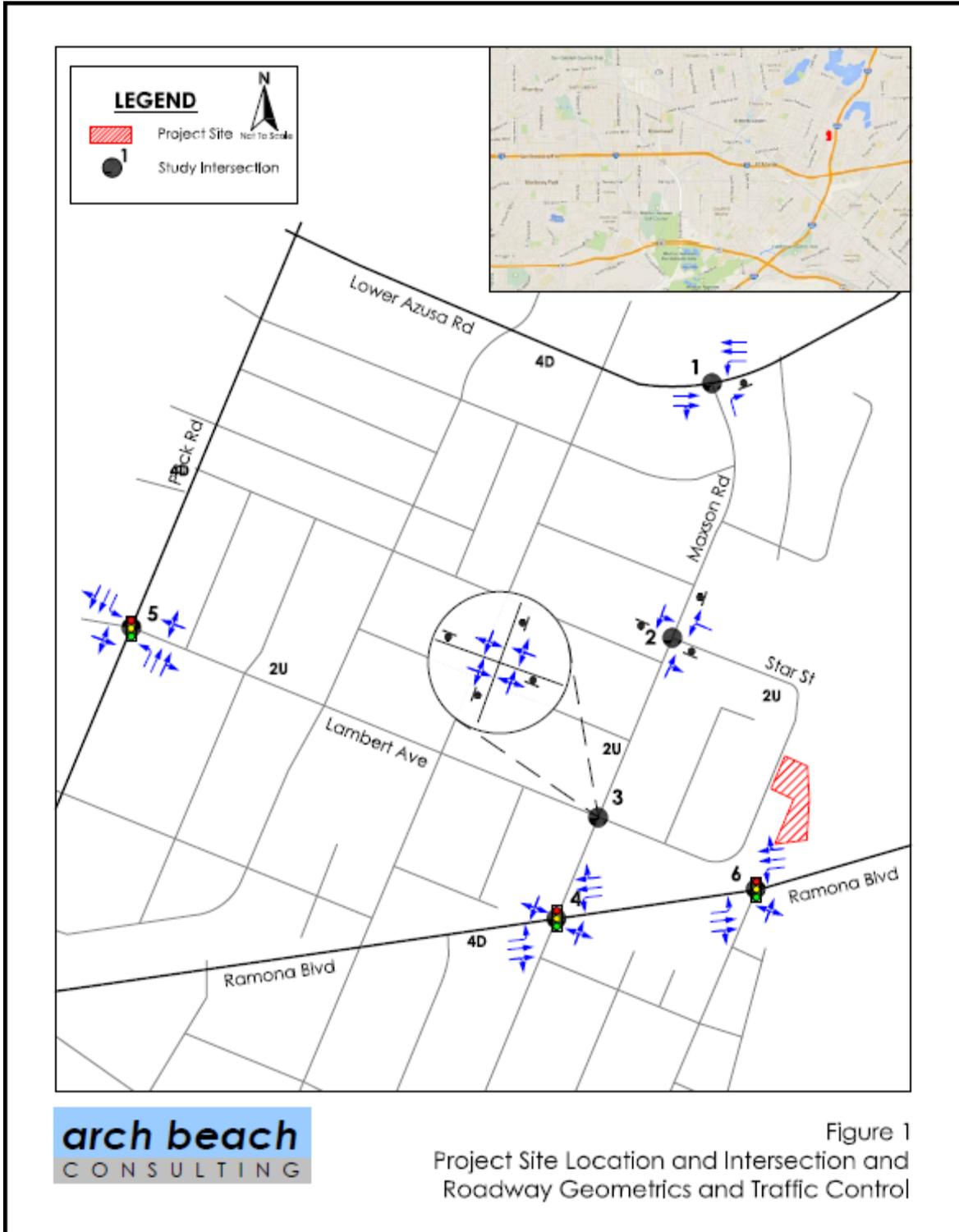
Per review of the 2010 Los Angeles County Congestion Management Program (CMP), the nearest CMP facilities in the project vicinity are Interstate 605 (I-605) and its interchanges at Ramona Boulevard and Lower Azusa Road. Per review of Appendix B of the CMP, *Guidelines for CMP Transportation Impact Analysis*, a regional CMP-level traffic analysis is not required for the proposed project since it would not add 50 or more weekday peak hour trips to the nearest CMP roadways/ramps, or 150 peak hour trips to the nearest CMP freeways.

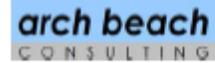
### **Site Location and Study Area**

Figure 1 illustrates the project site location and study area, including the study area intersections and traffic control. Regional access to the project site is provided by Interstate 605 (I-605) via its interchange with Ramona Boulevard and Lower Azusa Road. Local access is provided by Maxson Road, Bannister Avenue, and Lambert Avenue. Per direction from the City, the study area intersections are as follows:

1. Maxson Road/Lower Azusa Road
2. Maxson Road/Star Street
3. Maxson Road/Lambert Avenue
4. Maxson Road/Ramona Boulevard
5. Peck Road/Lambert Avenue
6. Gilman Road/Ramona Boulevard

All study area intersections are within the jurisdiction of the City.





**Methodology**

The study area intersections were analyzed using the *Intersection Capacity Utilization (ICU)* methodology for signalized intersections, or the *Highway Capacity Manual (HCM)* "Operations" methodology for unsignalized intersections. The ICU method determines the volume-to-capacity (V/C) ratio on a critical lane basis and determines LOS associated with each critical V/C ratio at the signalized intersection. The unsignalized intersection was analyzed using the HCM methodology. The HCM method determines the average control delay a driver may experience at the intersection.

The degree of congestion at an intersection is described by the level of service, which ranges from LOS A to LOS F, with LOS A representing free-flow conditions with little delay and LOS F representing over-saturated traffic flow throughout the peak hour. A complete description of the meaning of level of service can be found in the Highway Research Board Special Report 209, *Highway Capacity Manual (HCM 2000)*. Brief descriptions of the six levels of service for signalized intersections are shown in Table A.

**Table A – Level of Service Definitions**

Level of Service	V/C Ratio or ICU (signalized)	Control Delay in Seconds (unsignalized)
A	0.00 – 0.60	0.0 – 10.0 seconds
B	0.61 – 0.70	10.1 – 15.0 seconds
C	0.71 – 0.80	15.1 – 25.0 seconds
D	0.81 – 0.90	25.1 – 35.0 seconds
E	0.91 – 1.00	35.1 – 50.0 seconds
F	1.01 or greater	50.1 seconds or greater

Table B provides a description of each specific level of service grade (LOS A through LOS F).

**Significance Criteria**

Per the City's General Plan Circulation Element (2011), the City desires to maintain LOS D throughout the City, except that LOS E may occur in the following circumstances:

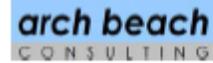
- Intersections/roadways at, or adjacent to, freeway ramps
- Intersections/roadways on major corridors and transit routes
- Intersections/roadways on truck routes
- Intersections/roadways in, or adjacent to, commercial districts

Therefore, a project would have a significant impact if it resulted in an increase in the V/C ratio of an intersection operating at LOS E or F per the increases noted below in Table C.

**Table C – Significance Criteria**

Level of Service	Final V/C Ratio	Project-Related Increase in V/C
E, F	> 0.900	equal to or greater than 0.010

For intersections significantly impacted by the project in the weekday a.m. and/or p.m. peak hours, mitigation measures will be provided to bring the intersection LOS back to baseline (i.e., "before project") LOS levels.



**Table B – Level of Service Descriptions**

LOS	Description
A	No approach phase is fully utilized by traffic, and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily, and nearly all drivers find freedom of operation.
B	This service level represents stable operation, where an occasional approach phase is fully utilized and a substantial number are nearing full use. Many drivers begin to feel restricted within platoons of vehicles.
C	This level still represents stable operating conditions. Occasionally drivers may have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so.
D	This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
E	Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection approach can accommodate. Full utilization of every signal cycle is seldom attained no matter how great the demand.
F	This level describes forced flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from a restriction downstream. Speeds are reduced substantially, and stoppages may occur for short or long periods of time due to the congestion. In the extreme case, both speed and volume can drop to zero.

Source: Highway Capacity Manual, Transportation Research Board, Special Report No. 209, Washington, D.C., 2000.

Once an unsignalized intersection is found to operate at LOS E or F, a traffic signal warrant consistent with the *Manual of Uniform Traffic Control Devices (MUTCD)* would need to be prepared to determine whether signalization of the intersections would be warranted. If the proposed project causes a traffic signal warrant to be met, that would be considered a significant impact.

### Traffic Analysis Scenarios

This traffic study analyzed the following traffic scenarios:

#### Existing Condition

Existing traffic volumes were collected at the study intersections in mid-July 2014 during a typical summer weekday. There were four schools in the study area that were closed for the summer break: Durfee Elementary School to the north; La Primaria Elementary School and Fernando Ledesma Continuation High School to the south; and, Wright Elementary School to the west. Traffic related to those schools were estimated using trip rates from *Trip Generation, 9th Edition* from the Institute of Transportation Engineers (ITE), distributed on to the study area based on their assumed attendance boundaries, and added to the existing summer traffic volumes. This adjusted existing traffic scenario constitutes the environmental setting in accordance with the CEQA analysis at the time that the hearing body reviews the proposed project.



#### **Existing plus Project Condition**

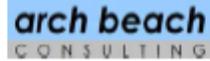
The Existing plus Project Condition traffic was developed by adding the proposed project traffic to the Existing (adjusted) Condition. This scenario was the basis for determining project-specific impacts and mitigation measures.

#### **Opening Year 2016 Baseline Condition**

The proposed project is anticipated to be built and occupied by year 2016. Opening year traffic in this scenario was forecast for 2016 by applying an annual ambient growth rate to the existing traffic volumes. In addition to the ambient growth rate, traffic from approved and pending projects (i.e. cumulative projects) in the project's vicinity has been added.

#### **Opening Year 2016 plus Project Condition**

The Opening Year 2016 plus Project Condition traffic was developed by adding the proposed project traffic to the Opening Year Baseline Condition. This scenario was also the basis for determining project-specific impacts and mitigation measures.



## 2.0 PROJECT DESCRIPTION AND TRAFFIC GENERATION

The following section provides information on the permanent operation of the proposed project relative to the local and regional circulation network.

### **Project Size and Description**

Figure 2 illustrates the site plan of the proposed project. The proposed project is the development of 23 single-family detached homes along the west side of the San Gabriel River in the eastern side of the City of El Monte. The project site sits on a mostly vacant 3.16 acre parcel with some agricultural uses between Bannister Avenue and the San Gabriel River. The project site is bounded by single-family homes to the north and south; the San Gabriel River Trail and River to the east; and, single-family homes and Bannister Avenue to the west.

Per the City Zoning Code, the project site is zoned for "R-1B" (residential) and "PF" (public facility). Therefore, the parking requirement per zone R-1B is "two (2) parking spaces within a fully enclosed garage for the first 1,200 square feet of gross floor area. A three-car garage is required for a dwelling unit with a gross floor area greater than 2,000 square feet or having more than four bedrooms. For units with more than four bedrooms, one open parking space shall be required for each bedroom after the first four bedrooms." Based on review of the site plan, the proposed project would be designed to Code with all dwelling units providing three-car garages, and three open spaces (at three cars in width) on each driveway, for a total of 138 parking spaces.

Vehicular access to the proposed project would be provided from a new driveway on the east side of Bannister Avenue which would become a private street/cul-de-sac at 26 feet in width. No sidewalks proposed, and no parking would be permitted on both sides of the street.

Currently, there is a permanent vehicular road-block (bicycle and pedestrian access is permitted) for traffic on Bannister Avenue, midway between Star Street and Lambert Avenue, north and adjacent to the northern boundary of the proposed project. The proposed project would enhance the south side of the road-block by curving Bannister Avenue into the project's driveway, and building a continuous sidewalk on both sides of Bannister Avenue, and enhancing the walkway through the road-block.

### **Project Traffic**

This section describes the trip generation, distribution, and assignment of the proposed project's traffic volumes on the study area transportation network facilities.

#### **Trip Generation**

Weekday daily, a.m. and p.m. peak hour trip generation estimates for the proposed project were developed using trip rates provided in the Institute of Transportation Engineers (ITE) *Trip Generation, 9<sup>th</sup> Edition*. Summaries of the trip generation rates and resulting vehicle trips for the proposed project are presented in Table D.

According to the table, the proposed project would generate approximately 219 daily trips, 17 a.m. peak hour trips (4 inbound and 13 outbound), and 23 p.m. peak hour trips (14 inbound and 9 outbound).

**arch beach**  
CONSULTING

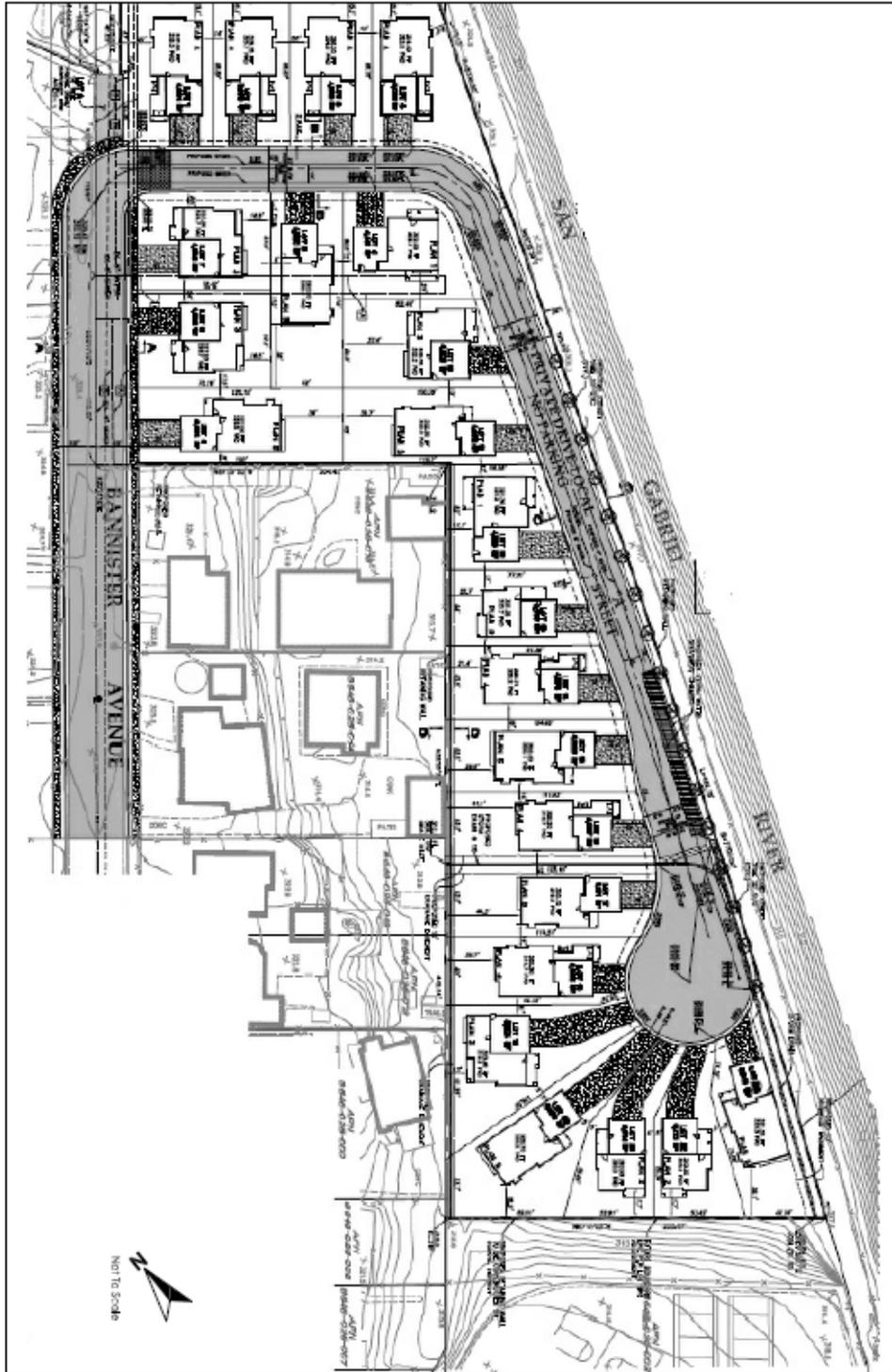


Figure 2  
Project Site Plan





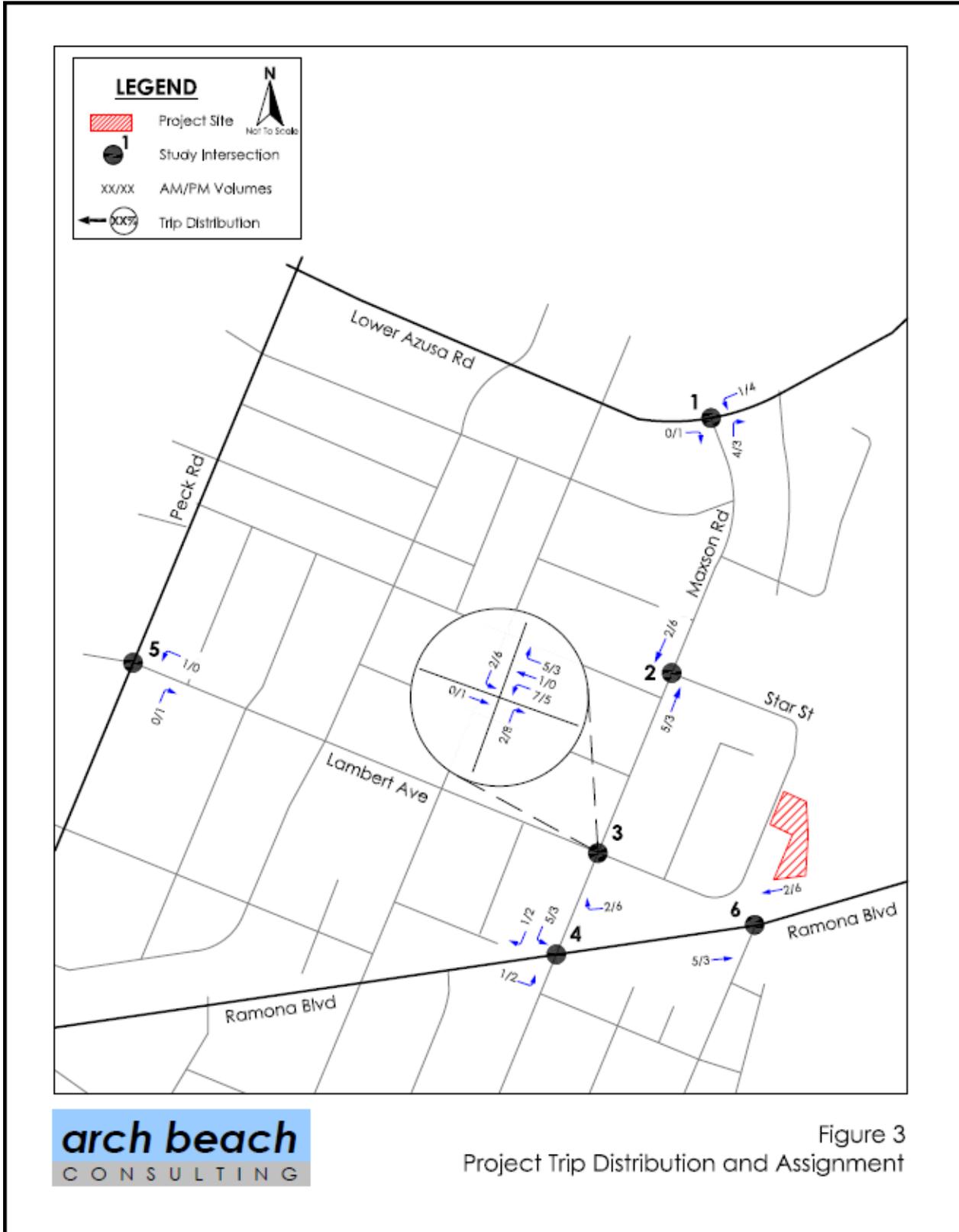
Table D – Project Trip Generation Estimates

Land Use	Size/Units	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
<b>TRIP RATES</b>								
Single-Family Detached Homes	per DU	9.52	0.19	0.56	0.75	0.63	0.37	1.00
<b>TRIP GENERATION</b>								
Single-Family Detached Homes	23 DUs	219	4	13	17	14	9	23

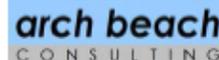
Note: Trip rates from *Trip Generation, 9<sup>th</sup> Edition*, Institute of Transportation Engineers, 2012.

### ***Trip Distribution and Assignment***

Regional and local trip distribution percentages for the proposed project were based on logical peak hour commute patterns. Figure 3 illustrates the trip distribution percentages for the proposed project. The trip distribution percentages at each intersection were applied to the proposed project's weekday daily, a.m. and p.m. peak hour trip generation estimates to calculate the project trip assignment. The resulting weekday daily, a.m. and p.m. peak hour trip assignments are also shown on Figure 3.







### 3.0 EXISTING CONDITIONS ANALYSIS

The following section describes the existing traffic conditions in the project study area. Existing traffic volumes were collected at the study intersections in mid-July 2014 during a typical summer weekday. There were four schools in the study area that were closed for the summer break: Durfee Elementary School to the north; La Primaria Elementary School and Fernando Ledesma Continuation High School to the south; and, Wright Elementary School to the west. Traffic related to those schools were estimated using trip rates from *Trip Generation, 9<sup>th</sup> Edition* (ITE), distributed on to the study area based on their assumed attendance boundaries, and added to the existing summer traffic volumes. This section describes the traffic conditions related to the following traffic scenarios:

- Existing (adjusted) Conditions
- Existing(adjusted) plus Project

#### *Existing Traffic Conditions*

##### **Roadways**

Regional access to the project site is provided by Interstate 605 (I-605) via its interchange with Ramona Boulevard and Lower Azusa Road. Local access is provided by Maxson Road, Bannister Avenue, and Lambert Avenue. The following describes the roadways in the study area:

##### **Lower Azusa Road**

Lower Azusa Road is designated as a Secondary Arterial and Truck Route in the City's *General Plan, Circulation Element*. Lower Azusa Road provides east-west regional and local access throughout the City of El Monte starting at its intersection with Rosemead Boulevard (SR 19) to the west, and where it becomes Los Angeles Street in Baldwin Park, east of I-605. In the vicinity of the study area, Lower Azusa Road is a divided four-lane roadway with a painted median serving as a two-way left-turn lane (TWLTL). On-street parking is permitted on both sides of the street, and the posted speed limit is 35 miles per hour (MPH). In addition, Foothill Transit operates a bus route along Lower Azusa with a stop on the south side of the street, before Durfee Avenue.

##### **Ramona Boulevard**

Ramona Boulevard is designated as a Secondary Arterial, Truck Route, and Mid Valley Transit Corridor in the City's *General Plan, Circulation Element*. Ramona Boulevard provides east-west regional and local access throughout the City of El Monte starting at its intersection with Santa Anita Avenue to the west, and where it becomes San Bernardino Road in Baldwin Park, at its intersection with Puente Avenue. In the vicinity of the study area, Ramona Boulevard is a divided four-lane roadway with a painted median serving as a two-way left-turn lane (TWLTL). On-street parking is not permitted on either side of the street, and the posted speed limit is 35 MPH. In addition, Foothill Transit operates a bus route along Ramona Boulevard with stops on both sides of Ramon Boulevard at Maxson Road.

##### **Maxson Road**

Maxson Road is designated as a part of the Backbone Street System in the City's *General Plan, Circulation Element*. Maxson Road provides north-south local access between Lower Azusa Road and Ramona Boulevard. In the vicinity of the study area, Maxson Road is an undivided



two-lane roadway. On-street parking is permitted on both sides of the street, and the posted speed limit is 25 MPH.

#### **Bannister Avenue**

Bannister Avenue provides north-south local access between Star Street and its mid-block road-block, and the road-block and Lambert Avenue. Only pedestrian and bicycle access is allowed through the road-block. Bannister Avenue is an undivided two-lane roadway, and on-street parking is permitted on both sides of the street.

Currently, there is a permanent vehicular road-block for traffic on Bannister Avenue, midway between Star Street and Lambert Avenue, north and adjacent to the northern boundary of the proposed project. The proposed project would enhance the south side of the road-block by curving Bannister Avenue into the project's driveway, and building a continuous sidewalk on both sides of Bannister Avenue, and enhancing the walkway through the road-block.

#### **Intersection Geometrics and Traffic Volumes**

Figure 1, shown previously, illustrates the existing traffic controls and lane geometrics at the study area intersections and roadway segments. Existing traffic volumes were collected at the study area intersections in mid-July 2014 during a typical summer weekday. There were four schools in the study area that were closed for the summer break: Durfee Elementary School to the north; La Primaria Elementary School and Fernando Ledesma Continuation High School to the south; and, Wright Elementary School to the west. Traffic related to those schools were estimated using trip rates from *Trip Generation, 9<sup>th</sup> Edition* (ITE), distributed on to the study area based on their assumed attendance boundaries, and added to the existing summer traffic volumes.

Figure 4 shows the (adjusted) existing daily, a.m. and p.m. peak hour traffic volumes at the study intersections. The raw traffic volume count sheets are provided in Appendix A. Appendix B contains the worksheets that show the trip generation, manual addition, and distribution of school traffic volumes from the four schools in the study area.

#### **Levels of Service**

##### **Intersections**

Based on the analysis methodology described in Section 1.0, the existing a.m. and p.m. peak hour traffic volumes were input into the *Trafix* LOS software to determine the existing intersection delay and LOS values. The existing field-calculated peak hour factors (PHF) were adjusted to account for the short peaking traffic characteristics of the drop-off/pick-up operations of the adjacent schools. Table E presents the results of the existing intersection LOS analysis, while the LOS calculation sheets are provided in Appendix C.

Based on the existing LOS analysis, the existing study area intersections are currently operating with satisfactory LOS (LOS D or better) during both peak hours.



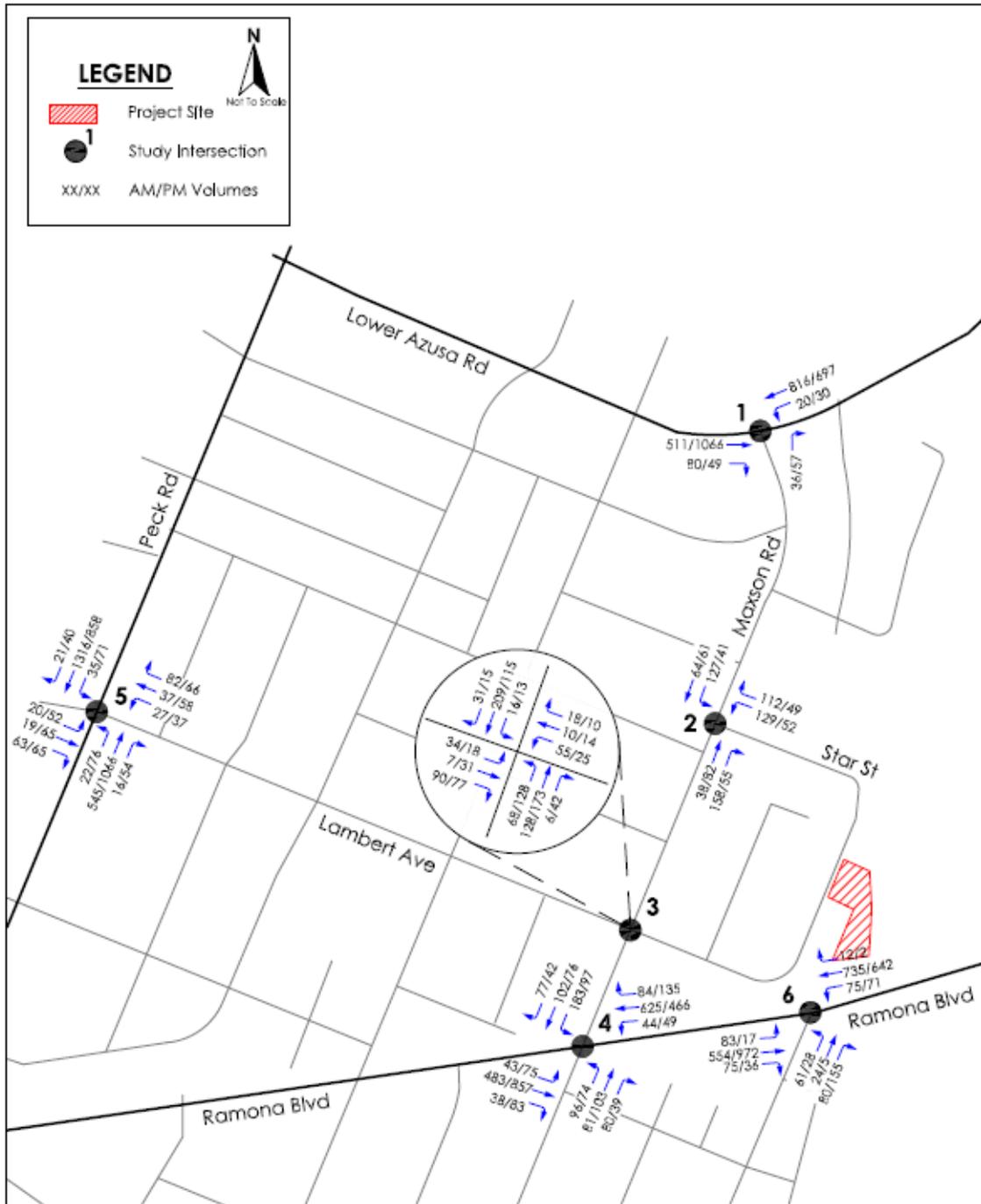


Figure 4  
Existing AM and PM Peak Hour  
Traffic Volumes



**Table E – Existing (adjusted) Condition Intersection Level of Service Summary**

Intersection	Control	Existing Condition			
		AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
1. Maxson Road/Lower Azusa Road	1-way stop	10.9 sec	B	14.3 sec	B
2. Maxson Road/Star Street	all-way stop	10.3 sec	B	8.1 sec	A
3. Maxson Road/Lambert Avenue	all-way stop	10.3 sec	B	10.4 sec	B
4. Maxson Road/Ramona Boulevard	signal	0.708	C	0.657	B
5. Peck Avenue/Lambert Avenue	signal	0.706	C	0.691	B
6. Gilman Road/Ramona Boulevard	signal	0.544	A	0.607	B

Notes: LOS for signalized intersections based on Intersection Capacity Utilization (ICU); LOS for unsignalized intersections based on Highway Capacity Manual (HCM).

**Bold value indicates intersection is operating with unsatisfactory LOS, at LOS E or F.**

### Pedestrian and Bicycle Facilities

There are three basic categories of pedestrian and bicycle facilities as defined by the City. Class I Bikeway/Trails involve designs which are completely separated from traffic lanes. Class II Bike Lanes are on-street paths that are located along the edge of a street with a striped lane denoting this bike path. Class III Bike Boulevards also are located along a street edge, but are not striped. These paths are identified by street signs only.

Currently, there are continuous sidewalks along both sides of Bannister Avenue, except for an approximately 330 foot segment from the project driveway, south to where the existing sidewalks terminate. The proposed project would construct sidewalks on both sides of the street to connect with the project driveway and the existing road-block (pedestrian/bicycle access). In addition, there are existing sidewalks on both sides of Maxson Road through its entire length. There is an existing signalized intersection at Maxson Road/Ramona Boulevard with pedestrian phases.

Currently, Lower Azusa Road, Cogswell Road, and Ranchito Street are designated as Class III Bike Boulevards. There is also a planned connection to the adjacent San Gabriel River Trail near Star Street (Durfee Elementary School). The San Gabriel River Trail provides regional pedestrian and bicycle access along the west side of the San Gabriel River.

### Transit

Foothill Transit operates three bus routes in the project vicinity: Routes 178, 190/194, and 488. Route 178 travels along Lower Azusa Road with a stop on the south side of Lower Azusa Road, west of Durfee Avenue. When traveling eastbound, this route is destined to the Puente Hills Mall with stops in the City of Baldwin Park. When traveling westbound this route is destined to the El Monte Transit Station. Route 190/194 travels along Ramona Boulevard with stops on both sides of Ramona Boulevard, at Maxson Road. When traveling eastbound, this route is destined to Cal Poly Pomona, and when traveling westbound, this route is also destined to the El Monte Transit Station. Route 488 travels along Ramona Boulevard with stops on both sides of Ramona Boulevard, at Maxson Road (same stops as Route 190/194). When traveling eastbound, this route is destined to Citrus College and the City of Glendora, and when traveling westbound, this route is also destined to the El Monte Transit Station.





### **Existing plus Project**

Traffic generated by the proposed project was added to the existing scenario and the project impacts on the circulation system were analyzed. This scenario would determine project-specific impacts and mitigation measures (if required) with project traffic added to existing traffic volumes.

### **Traffic Volumes**

The proposed project trip assignment shown in Figure 3 was added to the existing traffic volumes in Figure 4 which resulted in the Existing plus Project traffic volumes. Figure 5 illustrates the Existing plus Project daily, a.m. and p.m. peak hour traffic volumes.

### **Levels of Service**

#### **Intersections**

Based on the analysis methodology described in Section 1.0, the Existing plus Project a.m. and p.m. peak hour traffic volumes were input into the *Traffix* LOS software to determine the intersection delay and LOS values. The existing field-calculated peak hour factors (PHF) were adjusted to account for the short peaking traffic characteristics of the drop-off/pick-up operations of the adjacent schools. Table F presents the results of the Existing plus Project intersection LOS analysis, while the LOS calculation sheets are provided in Appendix C.

Based on the Existing plus Project LOS analysis, all study area intersections would continue to operate with satisfactory LOS (LOS D or better) with addition of traffic from the proposed project.

### **Mitigation Measures**

No mitigation measures are required.

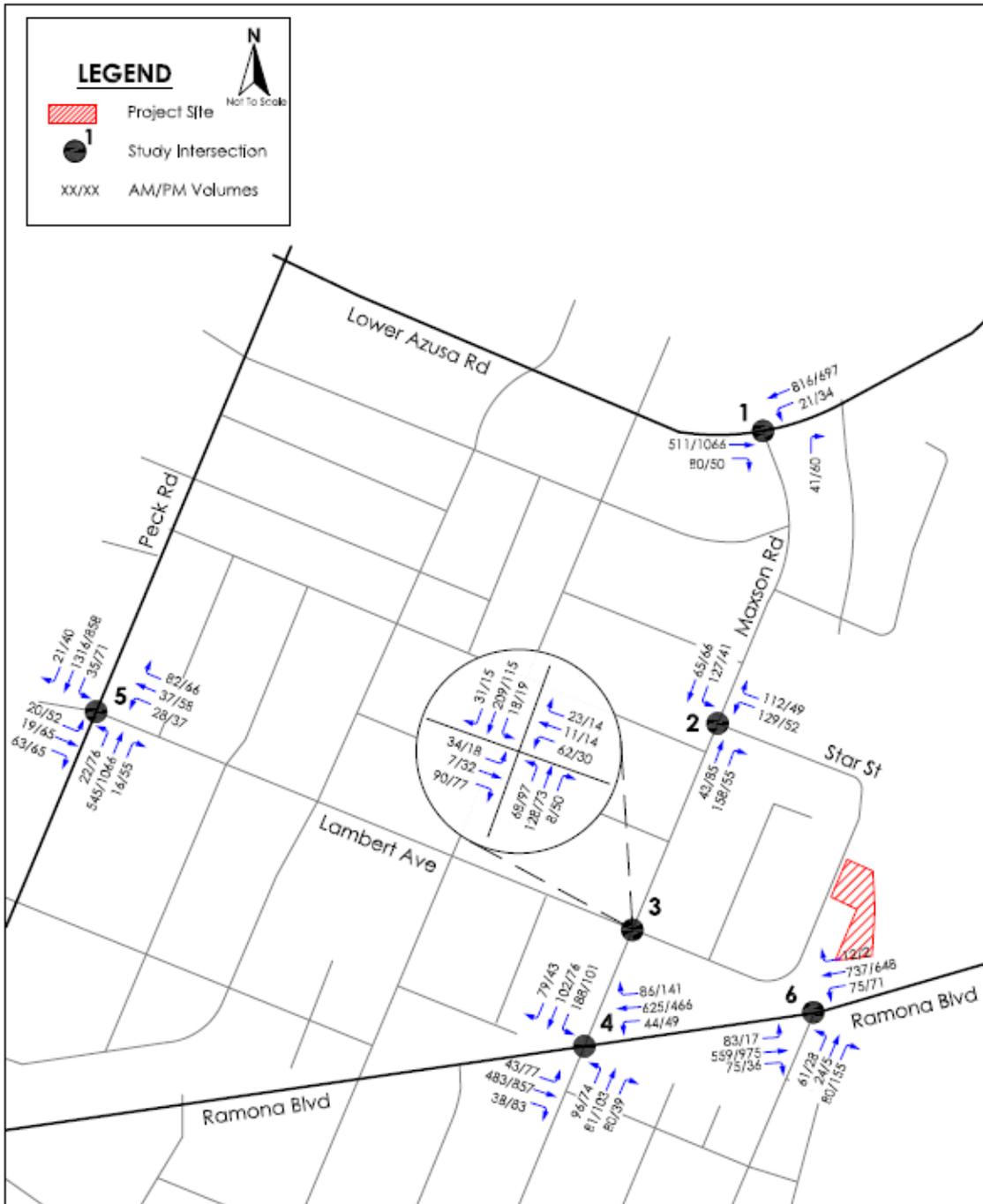


Figure 5  
 Existing plus Project AM and PM Peak Hour  
 Traffic Volumes



Table F – Existing (adjusted) plus Project Intersection Level of Service Summary

Intersection	Control	Existing Condition				Existing plus Project				Difference		Impact?
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM	PM	
		Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS			
1. Maxson Road/Lower Azusa Road	1-way stop	10.9 sec	B	14.3 sec	B	11.0 sec	B	14.4 sec	B	+0.1 sec	+0.1 sec	no
2. Maxson Road/Star Street	all-way stop	10.3 sec	B	8.1 sec	A	11.7 sec	B	8.4 sec	A	+1.4 sec	+0.3 sec	no
3. Maxson Road/Lambert Avenue	all-way stop	10.3 sec	B	10.4 sec	B	11.0 sec	B	10.6 sec	B	+0.7 sec	+0.2 sec	no
4. Maxson Road/Ramona Boulevard	signal	0.708	C	0.657	B	0.714	C	0.660	B	+0.006	+0.003	no
5. Peck Avenue/Lambert Avenue	signal	0.706	C	0.691	B	0.707	C	0.691	B	+0.001	0.000	no
6. Gilman Road/Ramona Boulevard	signal	0.544	A	0.607	B	0.545	A	0.608	B	+0.001	+0.001	no

Notes: LOS for signalized intersections based on Intersection Capacity Utilization (ICU); LOS for unsignalized intersections based on Highway Capacity Manual (HCM).

**Bold** value indicates intersection is operating with unsatisfactory LOS, at LOS E or F.

**Italic** value indicates significant project impact per the appropriate City's LOS significance criteria.





## 4.0 OPENING YEAR 2016 TRAFFIC CONDITIONS

### Opening Year 2016 Baseline Condition

This scenario is comprised of the existing (2014) traffic conditions, plus two years of ambient traffic growth (2014 to 2016), plus traffic from cumulative (approved and/or pending) developments in the study area. A conservative ambient traffic growth rate of two (2) percent per year was applied to the existing (adjusted) traffic volumes to forecast up to Opening Year 2016. The growth rates in the LA County CMP indicate less than one percent annual growth in the San Gabriel Valley area.

Cumulative development projects in the project vicinity were obtained from the City's *Economic Development and Redevelopment* website in July 2014. Appendix D contains the detailed information for the cumulative projects used in this TIA.

### Traffic Controls and Intersection Geometrics

There no improvements planned for the study area roadways and intersections through the 2016 project opening year. Therefore, the existing intersection traffic controls and geometrics were assumed for those intersections in the 2016 level of service analysis.

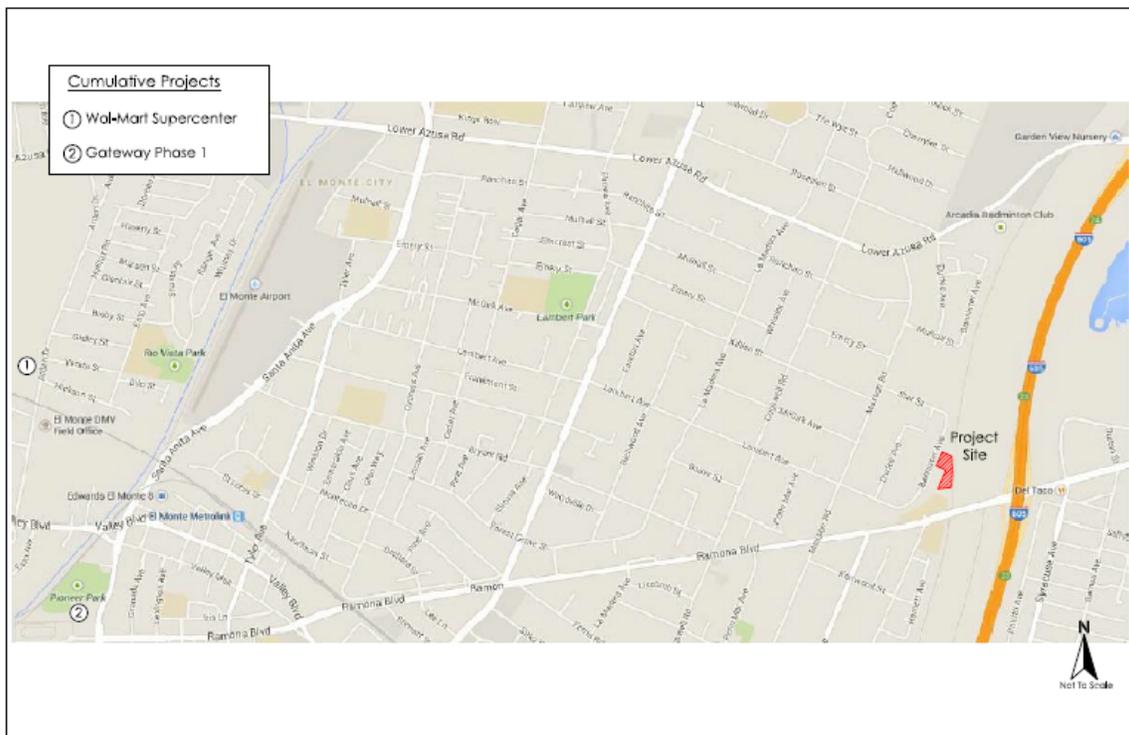
### Traffic Volumes

As discussed above, Opening Year 2016 baseline traffic volumes were forecast by applying a conservative annual growth rate of two (2) percent per year, plus the addition of traffic from cumulative development. Table G presents the list of cumulative developments in the study area, and their anticipated trip generation estimates, while Figure 6 illustrates the locations of the cumulative projects relative to the proposed project site.

Table G – Cumulative Projects Trip Generation Estimates

Land Use	Size/Units	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
<b>TRIP RATES</b>								
Apartment (ITE 220)	per DU	6.65	0.10	0.41	0.51	0.40	0.22	0.62
Shopping Center (ITE 820)	per T3F	ITE	ITE equation used			ITE equation used		
Free-Standing Discount Superstore (ITE 813)	per T3F	50.75	1.04	0.81	1.85	2.13	2.22	4.35
<b>TRIP GENERATION</b>								
<b>1. Gateway Phase 1</b>								
Apartment	480 DUs	3,192	49	196	245	193	104	298
Shopping Center	25,000 T3F	2,758	41	25	67	114	123	237
	Pass-by trips (58%)	-1,609	-24	-15	-39	-66	-72	-138
	<b>Total Trip Generation</b>	<b>4,341</b>	<b>66</b>	<b>206</b>	<b>273</b>	<b>241</b>	<b>155</b>	<b>396</b>
<b>2. Wal-Mart Supercenter</b>								
Free-Standing Discount Superstore	186,782 T3F	9,479	194	152	346	398	414	813
	Pass-by trips (28%)	-2,654	-54	-43	-97	-111	-116	-228
	<b>Total Trip Generation</b>	<b>6,825</b>	<b>139</b>	<b>109</b>	<b>249</b>	<b>287</b>	<b>298</b>	<b>585</b>
	<b>TOTAL CUMULATIVE PROJECTS TRIP GENERATION</b>	<b>11,166</b>	<b>206</b>	<b>316</b>	<b>521</b>	<b>527</b>	<b>454</b>	<b>981</b>
Notes:								
Trip generation rates based on <i>Trip Generation, 9th Edition</i> , Institute of Transportation Engineers (ITE), 2012.								
Pass-by percentages for retail uses based on <i>Trip Generation Handbook, Second Edition</i> , ITE 2004.								

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**arch beach**  
CONSULTING

Figure 6  
Locations of  
Cumulative Projects





Based on the table, the cumulative projects in the study area would generate a total of approximately 11,166 daily trips, 521 a.m. peak hour trips, and 981 p.m. peak hour trips. Those trips were distributed appropriately through the study area based on logical travel and commute corridors.

The trip assignments of the cumulative projects, and the ambient growth rate were applied to the existing (adjusted) traffic volumes which derived the Opening Year (2016) Baseline traffic volumes. Figure 7 illustrates the Opening Year (2016) Baseline daily, a.m. and p.m. peak hour volumes.

## Levels of Service

### Intersections

Based on the analysis methodology described in Section 1.0, the Opening Year 2016 Baseline a.m. and p.m. peak hour traffic volumes were input into the Synchro LOS software to determine the existing intersection delay and LOS values. The existing field-calculated peak hour factors (PHF) were adjusted to account for the short peaking traffic characteristics of the drop-off/pick-up operations of the adjacent elementary school. Table H presents the results of the Opening Year 2016 Baseline intersection LOS analysis, while the LOS calculation sheets are provided in Appendix D.

**Table H – Opening Year 2016 Baseline Intersection Level of Service Summary**

Intersection	Control	Opening Year Baseline Condition			
		AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
1. Maxson Road/Lower Azusa Road	1-way stop	11.1 sec	B	15.0 sec	B
2. Maxson Road/Star Street	all-way stop	12.2 sec	B	8.4 sec	A
3. Maxson Road/Lambert Avenue	all-way stop	11.2 sec	B	10.9 sec	B
4. Maxson Road/Ramona Boulevard	signal	0.743	C	0.694	B
5. Peck Avenue/Lambert Avenue	signal	0.745	C	0.747	C
6. Gilman Road/Ramona Boulevard	signal	0.570	A	0.644	B

Notes: LOS for signalized intersections based on Intersection Capacity Utilization (ICU); LOS for unsignalized intersections based on Highway Capacity Manual (HCM).

**Bold value** indicates intersection is operating with unsatisfactory LOS, at LOS E or F.

Based on the Opening Year 2016 Baseline LOS analysis, the study area intersections are forecast to continue to operate with satisfactory LOS (LOS D or better) during both peak hours.

### Opening Year 2016 plus Project

Traffic generated by the proposed project was added to the Opening Year 2016 Baseline scenario and the project impacts on the circulation system were analyzed. This scenario would determine project-specific impacts and mitigation measures (if required) with project traffic added to the Opening Year 2016 Baseline traffic volumes.

### Traffic Volumes

The proposed project trip assignment shown in Figure 3 was added to the Opening Year 2016 Baseline traffic volumes in Figure 7 which resulted in the Opening Year 2016 plus Project traffic volumes. Figure 8 illustrates the Opening Year plus Project daily, a.m. and p.m. peak hour traffic volumes.

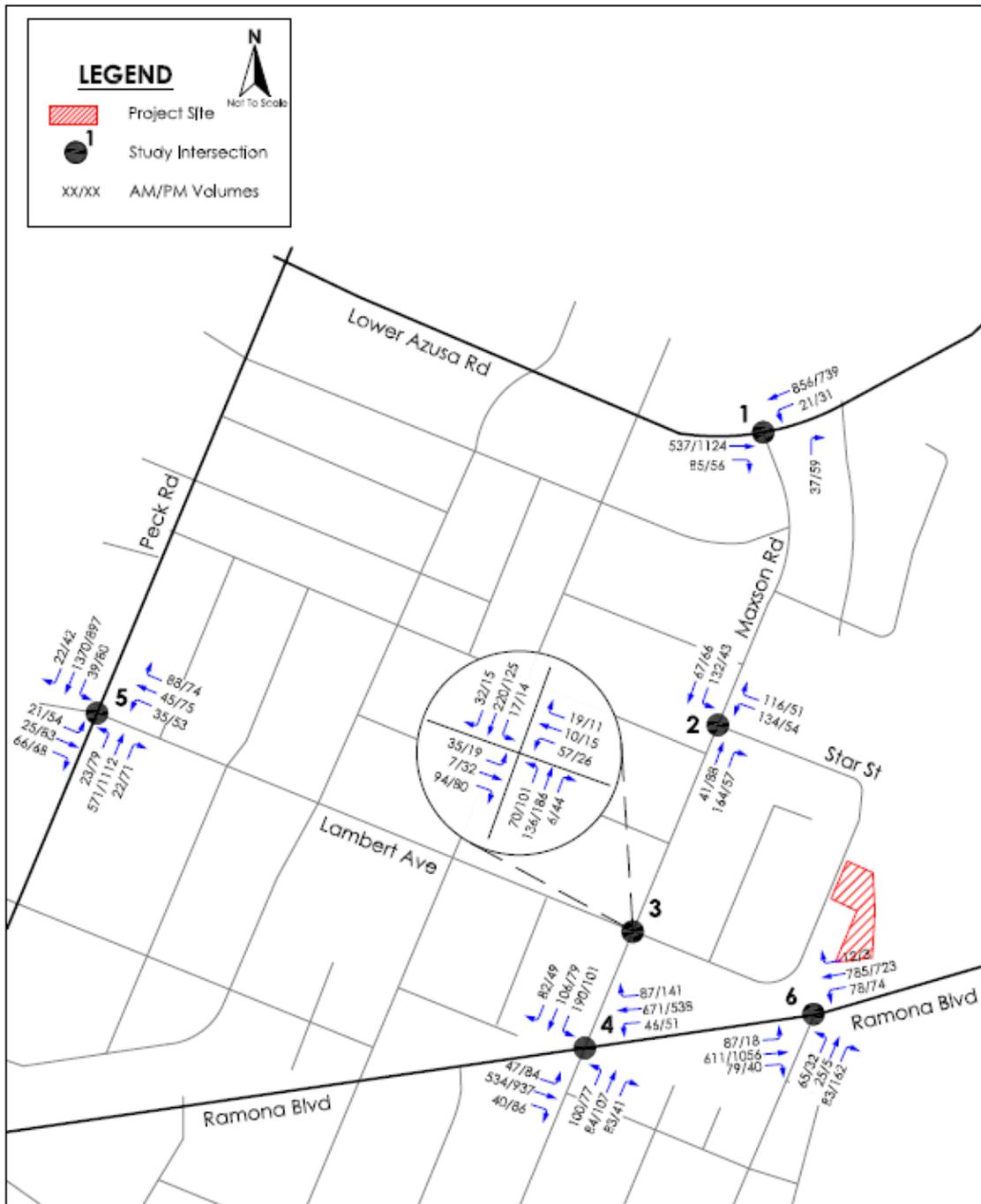


Figure 7  
 Opening Year 2016 Baseline AM and PM Peak Hour  
 Traffic Volumes



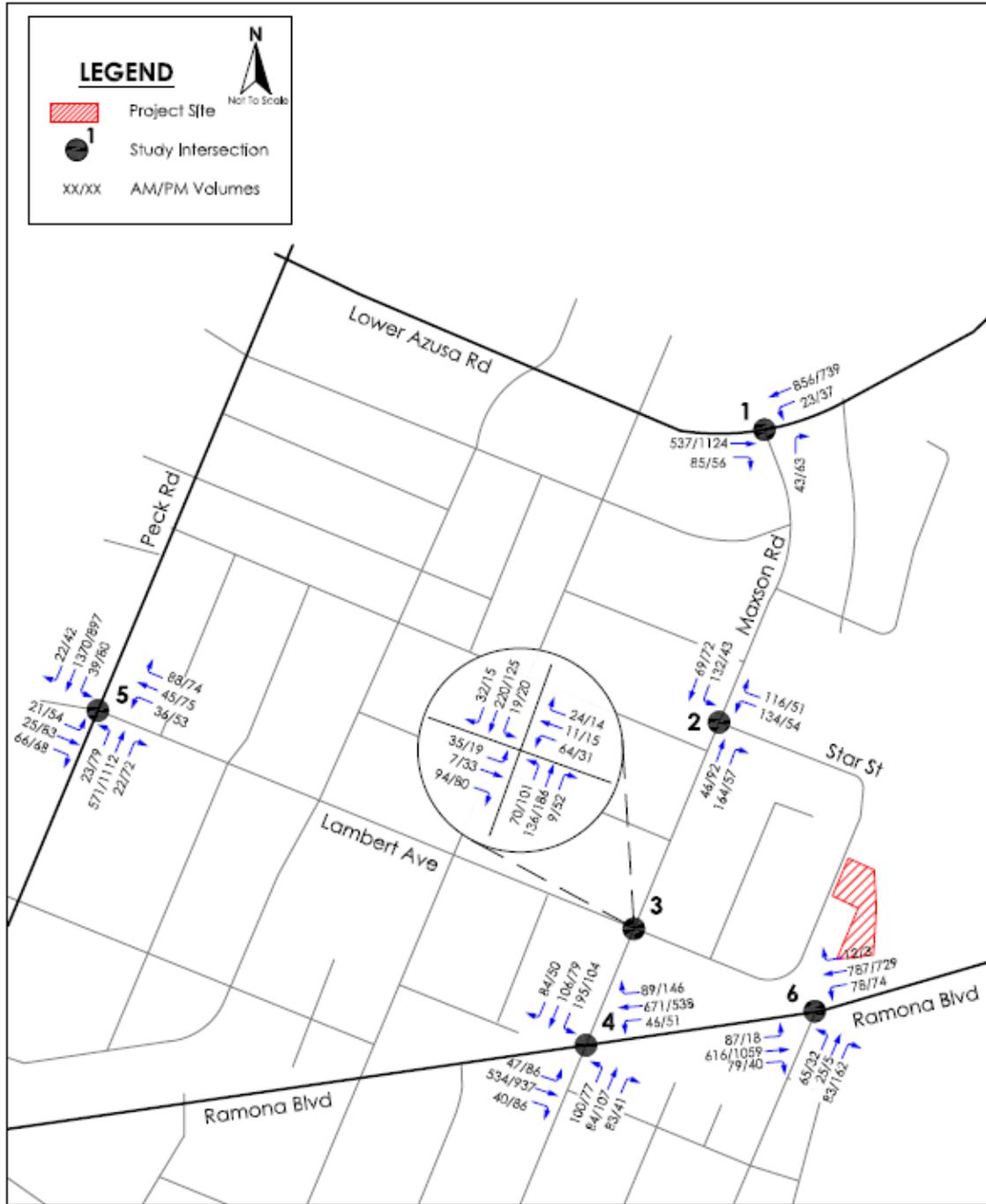


Figure 8  
 Opening Year 2016 plus Project AM and PM  
 Peak Hour Traffic Volumes



## Levels of Service

### Intersections

Based on the analysis methodology described in Section 1.0, the Opening Year 2016 plus Project a.m. and p.m. peak hour traffic volumes were input into the *Trafix* LOS software to determine the intersection delay and LOS values. The existing field-calculated peak hour factors (PHF) were adjusted to account for the short peaking traffic characteristics of the drop-off/pick-up operations of the adjacent elementary school. Table I presents the results of the Opening Year 2016 plus Project intersection LOS analysis, while the LOS calculation sheets are provided in Appendix D.

Based on the Opening Year 2016 plus Project LOS analysis, all study area intersections are forecast to continue to operate with satisfactory LOS (LOS D or better) with addition of traffic from the proposed project.

### Mitigation Measures

No mitigation measures are required.

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Table I – Opening Year 2016 plus Project Intersection Level of Service Summary

Intersection	Control	Opening Year Baseline Condition				Opening Year plus Project				Difference		Impact?
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM	PM	
		Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS			
1. Maxson Road/Lower Azusa Road	1-way stop	11.1 sec	B	15.0 sec	B	11.2 sec	B	15.1 sec	C	+0.1 sec	+0.1 sec	no
2. Maxson Road/Star Street	all-way stop	12.2 sec	B	8.4 sec	A	12.3 sec	B	8.5 sec	A	+0.1 sec	+0.1 sec	no
3. Maxson Road/Lambert Avenue	all-way stop	11.2 sec	B	10.9 sec	B	11.4 sec	B	11.1 sec	B	+0.2 sec	+0.2 sec	no
4. Maxson Road/Ramona Boulevard	signal	0.743	C	0.694	B	0.749	C	0.697	B	+0.006	+0.003	no
5. Peck Avenue/Lambert Avenue	signal	0.745	C	0.747	C	0.745	C	0.748	C	0.000	+0.001	no
6. Gilman Road/Ramona Boulevard	signal	0.570	A	0.644	B	0.571	A	0.645	B	+0.001	+0.001	no

Notes: LOS for signalized intersections based on Intersection Capacity Utilization (ICU); LOS for unsignalized intersections based on Highway Capacity Manual (HCM).

**Bold** value indicates intersection is operating with unsatisfactory LOS, at LOS E or F.

**bold** value indicates significant project impact per the appropriate City's LOS significance criteria.



## 5.0 PROJECT ACCESS, CIRCULATION AND PARKING

The following section discusses the proposed project's access and circulation characteristics, and parking requirements. If required, mitigation measures will be proposed to mitigate impacts to less than significant levels.

### ***Project Access and Circulation***

Vehicular access to the proposed project would be provided from a new driveway on the east side of Bannister Avenue which would become a private street/cul-de-sac at 26 feet in width. No sidewalks proposed, and no parking would be permitted on both sides of the street.

Currently, there is a permanent vehicular road-block (bicycle and pedestrian access is permitted) for traffic on Bannister Avenue, midway between Star Street and Lambert Avenue, north and adjacent to the northern boundary of the proposed project. The proposed project would enhance the south side of the road-block by curving Bannister Avenue into the project's driveway, and building a continuous sidewalk on both sides of Bannister Avenue, and enhancing the walkway through the road-block.

The new sidewalks on Bannister Avenue, project driveway, and private street will be designed to meet the City's design standards.

### ***Parking***

Per the City Zoning Code, the project site is zoned for "R-1B" (residential) and "PF" (public facility). Therefore, the parking requirement per zone R-1B is "two (2) parking spaces within a fully enclosed garage for the first 1,200 square feet of gross floor area. A three-car garage is required for a dwelling unit with a gross floor area greater than 2,000 square feet or having more than four bedrooms. For units with more than four bedrooms, one open parking space shall be required for each bedroom after the first four bedrooms." Based on review of the site plan, the proposed project would be designed to Code with all dwelling units providing three-car garages, and three open spaces (at three cars in width) on each driveway, for a total of 138 parking spaces.

### ***Mitigation Measures***

No mitigation measures are required.



## 6.0 CONCLUSIONS AND RECOMMENDATIONS

The following section provides the conclusions and recommendations (if any) for the traffic analysis of the proposed project as noted above in Sections 3.0 – Existing Conditions, 4.0 – Opening Year 2016, 5.0 – Project Access, Circulation and Parking.

### ***Project Trip Generation***

The proposed project is the development of 23 single-family detached homes along the west side of the San Gabriel River in the eastern side of the City of El Monte. Per ITE trip rates, the proposed project would generate approximately 219 daily trips, 17 a.m. peak hour trips (4 inbound and 13 outbound), and 23 p.m. peak hour trips (14 inbound and 9 outbound).

### ***Existing plus Project***

Based on the Existing plus Project LOS analysis, the study area intersections would continue to operate with satisfactory LOS (LOS D or better) with addition of traffic from the proposed project.

No mitigation measures are required.

### ***Opening Year 2016 plus Project***

Based on the Opening Year plus Project LOS analysis, the study area intersections would continue to operate with satisfactory LOS (LOS D or better) with addition of traffic from the proposed project.

No mitigation measures are required.

### ***Project Access, Circulation and Parking***

Vehicular access to the proposed project would be provided from a new driveway on the east side of Bannister Avenue which would become a private street/cul-de-sac at 26 feet in width. No sidewalks proposed, and no parking would be permitted on both sides of the street.

Currently, there is a permanent vehicular road-block (bicycle and pedestrian access is permitted) for traffic on Bannister Avenue, midway between Star Street and Lambert Avenue, north and adjacent to the northern boundary of the proposed project. The proposed project would enhance the south side of the road-block by curving Bannister Avenue into the project's driveway, and building a continuous sidewalk on both sides of Bannister Avenue, and enhancing the walkway through the road-block.

The new sidewalks on Bannister Avenue, project driveway, and private street will be designed to meet the City's design standards.

Per the City Zoning Code, the project site is zoned for "R-1B" (residential) and "PF" (public facility). Therefore, the parking requirement per zone R-1B is "two (2) parking spaces within a fully enclosed garage for the first 1,200 square feet of gross floor area. A three-car garage is required for a dwelling unit with a gross floor area greater than 2,000 square feet or having more than four bedrooms. For units with more than four bedrooms, one open parking space shall be required for each bedroom after the first four bedrooms." Based on review of the site plan, the proposed project would be designed to Code with all dwelling units providing three-car garages, and three open spaces (at three cars in width) on each driveway, for a total of 138 parking spaces.

No mitigation measures are required.



## 7.0 REFERENCES

City of El Monte, *General Plan*, 2011.

City of El Monte, *Municipal Code, Zoning Ordinance*.

Institute of Transportation Engineers, *Trip Generation, 9<sup>th</sup> Edition*, 2012.

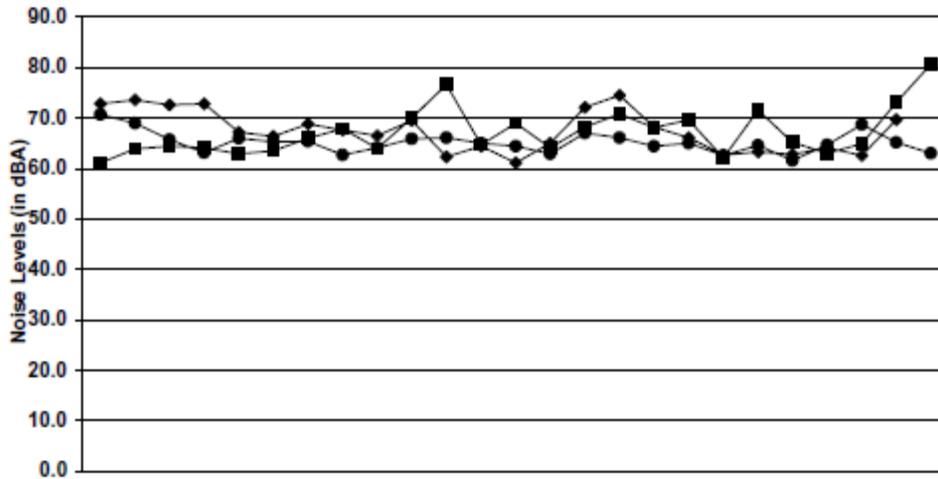
Transportation Research Board, *Highway Capacity Manual, Special Report No. 209*, Washington, D.C., 2000.

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## **APPENDIX B - NOISE MEASUREMENT ANALYSIS**

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Actual Noise Levels During Measurement				Noise Measurement Results in Leq%				
1-25	26-50	51-75	76-100	L%	1-25	26-50	51-75	76-100
68.4	72.8	61.1	70.7	L <sub>99</sub>	77.0	74.5	80.7	70.7
65.8	73.6	63.9	69.0		75.7	73.6	76.6	69.0
63.6	72.6	64.4	65.7	L <sub>90</sub>	74.5	72.8	73.1	68.7
64.1	72.8	64.1	63.1		72.8	72.8	71.6	67.0
68.2	67.2	62.9	66.0		71.3	72.6	70.8	66.1
64.5	66.4	63.5	65.3		70.6	72.1	70.0	66.1
65.0	68.8	66.0	65.4		69.7	69.7	69.6	66.0
67.2	67.6	67.9	62.7		68.4	69.5	69.0	65.9
72.8	66.5	64.0	64.1		68.2	68.8	68.2	65.7
74.5	69.5	70.0	65.9		67.2	68.2	68.1	65.4
65.7	62.3	76.6	66.1		66.8	67.6	67.9	65.3
71.3	64.4	64.7	65.0	L <sub>50</sub>	66.0	67.2	66.0	65.2
75.7	61.1	69.0	64.4		66.0	66.5	65.2	65.0
65.6	65.0	64.1	62.9		65.8	66.4	64.9	65.0
69.7	72.1	68.2	67.0		65.7	66.1	64.7	64.7
70.6	74.5	70.8	66.1		65.6	65.0	64.4	64.6
77.0	68.2	68.1	64.4		65.6	64.4	64.1	64.4
66.0	66.1	69.6	65.0		65.0	64.1	64.1	64.4
64.2	62.7	62.1	62.6		65.0	63.3	64.0	64.1
64.9	63.3	71.6	64.6	L <sub>25</sub>	64.9	63.3	63.9	63.1
65.0	62.8	65.2	61.6		64.6	62.8	63.5	63.0
66.8	64.1	63.0	64.7		64.5	62.7	63.0	62.9
65.6	62.6	64.9	68.7	L <sub>10</sub>	64.2	62.6	62.9	62.7
64.6	69.7	73.1	65.2		64.1	62.3	62.1	62.6
66.0	63.3	80.7	63.0		63.6	61.1	61.1	61.6



**Exhibit 3-8**  
**Noise Measurements**

Source: Blodgett/Baylosis Associates, Inc.

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## **APPENDIX C - AIR QUALITY (CALEEMOD) WORKSHEETS**

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**Bannister Avenue Homes**  
Los Angeles-South Coast County, Summer

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Single Family Housing	23.00	Dwelling Unit	2.46	107,225.00	66

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	33
<b>Climate Zone</b>	9			<b>Operational Year</b>	2016
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MWhr)</b>	630.89	<b>CH4 Intensity (lb/MWhr)</b>	0.029	<b>N2O Intensity (lb/MWhr)</b>	0.00617

**1.3 User Entered Comments & Non-Default Data**

- Project Characteristics -
- Land Use - Lot acreage and squarefootage reflect the lots 1-23 square footage value given by the developer.
- Construction Phase - These are the dates provided in the IS/MND
- Grading - Actual amount of import. 26,000 cubic yards will be recompacted. To
- Architectural Coating - Coating are restricted to 100 gr/L.
- Construction Off-road Equipment Mitigation -

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Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	250.00	100.00
tblArchitecturalCoating	EF_Nonresidential_Interior	250.00	100.00
tblConstructionPhase	NumDays	10.00	23.00
tblConstructionPhase	NumDays	220.00	110.00
tblConstructionPhase	NumDays	20.00	22.00
tblConstructionPhase	NumDays	6.00	21.00
tblConstructionPhase	NumDays	10.00	21.00
tblConstructionPhase	NumDays	3.00	22.00
tblConstructionPhase	PhaseEndDate	10/30/2015	10/31/2015
tblConstructionPhase	PhaseEndDate	5/29/2015	5/31/2015
tblGrading	AcresOfGrading	10.50	3.16
tblGrading	AcresOfGrading	33.00	3.16
tblGrading	MaterialImported	0.00	19,800.00
tblLandUse	LandUseSquareFeet	41,400.00	107,225.00
tblLandUse	LotAcreage	7.47	2.46
tblProjectCharacteristics	N2OIntensityFactor	0.006	0.00617
tblProjectCharacteristics	OperationalYear	2014	2016

**2.0 Emissions Summary**

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**2.1 Overall Construction (Maximum Daily Emission)**

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2015	36.9156	68.7183	46.4595	0.1102	8.4521	2.3700	10.8221	3.9351	2.1803	6.1153	0.0000	11,261.25 23	11,261.25 23	0.7546	0.0000	11,277.09 91
Total	36.9156	68.7183	46.4595	0.1102	8.4521	2.3700	10.8221	3.9351	2.1803	6.1153	0.0000	11,261.25 23	11,261.25 23	0.7546	0.0000	11,277.09 91

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2015	36.9152	68.6997	46.4410	0.1101	35.7803	2.3684	38.1487	9.5448	2.1788	11.7236	0.0000	11,259.26 63	11,259.26 63	0.7539	0.0000	11,275.09 92
Total	36.9152	68.6997	46.4410	0.1101	35.7803	2.3684	38.1487	9.5448	2.1788	11.7236	0.0000	11,259.26 63	11,259.26 63	0.7539	0.0000	11,275.09 92

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	1.0023e-003	0.0417	0.0099	0.0182	-323.3314	0.0679	-262.6081	-142.6684	0.0679	-91.7084	0.0000	0.0176	0.0176	0.0914	0.0000	0.0177

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**2.2 Overall Operational**

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	8.4403	0.1754	13.4847	0.0185		1.7673	1.7673		1.7670	1.7670	215.4391	417.4167	632.8558	0.6460	0.0146	650.9540
Energy	0.0203	0.1731	0.0736	1.1000e-003		0.0140	0.0140		0.0140	0.0140		220.9256	220.9256	4.2300e-003	4.0500e-003	222.2701
Mobile	2.7881	2.6485	10.9049	0.0256	1.6819	0.0390	1.7209	0.4497	0.0359	0.4856		2,253.623 1	2,253.623 1	0.0933		2,255.591 3
Total	11.2488	2.9970	24.4833	0.0462	1.6819	1.8203	3.6022	0.4487	1.8189	2.2868	215.4391	2,891.986 4	3,107.404 6	0.7434	0.0187	3,128.806 4

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	8.4403	0.1754	13.4847	0.0185		1.7673	1.7673		1.7670	1.7670	215.4391	417.4167	632.8558	0.6460	0.0146	650.9540
Energy	0.0203	0.1731	0.0736	1.1000e-003		0.0140	0.0140		0.0140	0.0140		220.9256	220.9256	4.2300e-003	4.0500e-003	222.2701
Mobile	2.7881	2.6485	10.9049	0.0256	1.6819	0.0390	1.7209	0.4497	0.0359	0.4856		2,253.623 1	2,253.623 1	0.0933		2,255.591 3
Total	11.2488	2.9970	24.4833	0.0462	1.6819	1.8203	3.6022	0.4487	1.8189	2.2868	215.4391	2,891.986 4	3,107.404 6	0.7434	0.0187	3,128.806 4

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

**3.0 Construction Detail**

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	3/1/2015	3/31/2015	5	22	
2	Site Preparation	Site Preparation	4/1/2015	4/30/2015	5	22	
3	Grading	Grading	5/1/2015	5/31/2015	5	21	
4	Building Construction	Building Construction	6/1/2015	10/31/2015	5	110	
5	Paving	Paving	11/1/2015	11/30/2015	5	21	
6	Architectural Coating	Architectural Coating	12/1/2015	12/31/2015	5	23	

OffRoad Equipment

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Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	255	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	174	0.41
Site Preparation	Scrapers	1	8.00	361	0.48
Site Preparation	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Grading	Graders	1	8.00	174	0.41
Grading	Rubber Tired Dozers	1	8.00	255	0.40
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Building Construction	Cranes	1	8.00	226	0.29
Building Construction	Forklifts	2	7.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Paving	Cement and Mortar Mixers	1	8.00	9	0.56
Paving	Pavers	1	8.00	125	0.42
Paving	Paving Equipment	1	8.00	130	0.36
Paving	Rollers	2	8.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

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Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class	
Demolition		5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation		3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading		4	10.00	0.00	2,475.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction		8	8.00	2.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving		6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating		1	2.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**

- Use Soil Stabilizer
- Water Exposed Area
- Clean Paved Roads

**3.2 Demolition - 2015**

Unmitigated Construction On-Site

Acres of Grading: 3.16

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.0666	29.6778	22.0566	0.0246		1.8651	1.8651		1.7469	1.7469		2,509.0599	2,509.0599	0.6357		2,522.4104
<b>Total</b>	<b>3.0666</b>	<b>29.6778</b>	<b>22.0566</b>	<b>0.0246</b>		<b>1.8651</b>	<b>1.8651</b>		<b>1.7469</b>	<b>1.7469</b>		<b>2,509.0599</b>	<b>2,509.0599</b>	<b>0.6357</b>		<b>2,522.4104</b>

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**3.2 Demolition - 2015**

Unmitigated Construction Off-Site

Acres of Grading: 3.16

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2936	0.0806	0.9940	1.8900e-003	0.1463	1.4500e-003	0.1468	0.0386	1.3300e-003	0.0399		165.2848	165.2848	9.4300e-003		165.4829
<b>Total</b>	<b>0.2936</b>	<b>0.0806</b>	<b>0.9940</b>	<b>1.8900e-003</b>	<b>0.1463</b>	<b>1.4500e-003</b>	<b>0.1468</b>	<b>0.0386</b>	<b>1.3300e-003</b>	<b>0.0399</b>		<b>165.2848</b>	<b>165.2848</b>	<b>9.4300e-003</b>		<b>165.4829</b>

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.0637	29.6506	22.0364	0.0246		1.8634	1.8634		1.7453	1.7453	0.0000	2,506.7580	2,506.7580	0.6352		2,520.0962
<b>Total</b>	<b>3.0637</b>	<b>29.6506</b>	<b>22.0364</b>	<b>0.0246</b>		<b>1.8634</b>	<b>1.8634</b>		<b>1.7453</b>	<b>1.7453</b>	<b>0.0000</b>	<b>2,506.7580</b>	<b>2,506.7580</b>	<b>0.6352</b>		<b>2,520.0962</b>

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**3.2 Demolition - 2015**

Mitigated Construction Off-Site

Acres of Grading: 3.16

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2935	0.0806	0.9940	1.8900e-003	0.1453	1.4500e-003	0.1468	0.0385	1.3300e-003	0.0399		165.2848	165.2848	9.4300e-003		165.4829
<b>Total</b>	<b>0.2935</b>	<b>0.0806</b>	<b>0.9940</b>	<b>1.8900e-003</b>	<b>0.1453</b>	<b>1.4500e-003</b>	<b>0.1468</b>	<b>0.0385</b>	<b>1.3300e-003</b>	<b>0.0399</b>		<b>165.2848</b>	<b>165.2848</b>	<b>9.4300e-003</b>		<b>165.4829</b>

**3.3 Site Preparation - 2015**

Unmitigated Construction On-Site

Acres of Grading: 3.16

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.1523	0.0000	0.1523	0.0165	0.0000	0.0165			0.0000			0.0000
Off-Road	2.8203	32.4699	18.6797	0.0239		1.5973	1.5973		1.4695	1.4695		2,508.1983	2,508.1983	0.7488		2,523.9231
<b>Total</b>	<b>2.8203</b>	<b>32.4699</b>	<b>18.6797</b>	<b>0.0239</b>	<b>0.1523</b>	<b>1.5973</b>	<b>1.7496</b>	<b>0.0165</b>	<b>1.4695</b>	<b>1.4860</b>		<b>2,508.1983</b>	<b>2,508.1983</b>	<b>0.7488</b>		<b>2,523.9231</b>

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**3.3 Site Preparation - 2015**

**Unmitigated Construction Off-Site**

Acres of Grading: 3.16

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1806	0.0496	0.6117	1.1600e-003	0.0894	8.9000e-004	0.0903	0.0237	8.2000e-004	0.0245		101.7137	101.7137	5.8000e-003		101.8356
<b>Total</b>	<b>0.1806</b>	<b>0.0496</b>	<b>0.6117</b>	<b>1.1600e-003</b>	<b>0.0894</b>	<b>8.9000e-004</b>	<b>0.0903</b>	<b>0.0237</b>	<b>8.2000e-004</b>	<b>0.0245</b>		<b>101.7137</b>	<b>101.7137</b>	<b>5.8000e-003</b>		<b>101.8356</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0594	0.0000	0.0594	6.4100e-003	0.0000	6.4100e-003			0.0000			0.0000
Off-Road	2.8177	32.4401	18.8626	0.0239		1.5958	1.5958		1.4682	1.4682	0.0000	2,606.8971	2,606.8971	0.7481		2,621.6075
<b>Total</b>	<b>2.8177</b>	<b>32.4401</b>	<b>18.8626</b>	<b>0.0239</b>	<b>0.0594</b>	<b>1.5958</b>	<b>1.6552</b>	<b>6.4100e-003</b>	<b>1.4682</b>	<b>1.4748</b>	<b>0.0000</b>	<b>2,606.8971</b>	<b>2,606.8971</b>	<b>0.7481</b>		<b>2,621.6075</b>

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**3.3 Site Preparation - 2015**

Mitigated Construction Off-Site

Acres of Grading: 3.16

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1806	0.0496	0.6117	1.1600e-003	0.0894	8.9000e-004	0.0903	0.0237	8.2000e-004	0.0245		101.7137	101.7137	5.9000e-003		101.8356
<b>Total</b>	<b>0.1806</b>	<b>0.0496</b>	<b>0.6117</b>	<b>1.1600e-003</b>	<b>0.0894</b>	<b>8.9000e-004</b>	<b>0.0903</b>	<b>0.0237</b>	<b>8.2000e-004</b>	<b>0.0245</b>		<b>101.7137</b>	<b>101.7137</b>	<b>5.9000e-003</b>		<b>101.8356</b>

**3.4 Grading - 2015**

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.2883	0.0000	6.2883	3.3436	0.0000	3.3436			0.0000			0.0000
Off-Road	2.9656	31.2611	20.2019	0.0206		1.7524	1.7524		1.6122	1.6122		2,164.1012	2,164.1012	0.6461		2,177.6687
<b>Total</b>	<b>2.9656</b>	<b>31.2611</b>	<b>20.2019</b>	<b>0.0206</b>	<b>6.2883</b>	<b>1.7524</b>	<b>8.0407</b>	<b>3.3436</b>	<b>1.6122</b>	<b>4.9558</b>		<b>2,164.1012</b>	<b>2,164.1012</b>	<b>0.6461</b>		<b>2,177.6687</b>

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**3.4 Grading - 2015**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	5.1207	37.3953	25.4930	0.0881	2.0520	0.6165	2.6685	0.5618	0.5670	1.1288		8,970.0090	8,970.0090	0.0729		8,971.5405
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2258	0.0620	0.7646	1.4500e-003	0.1118	1.1200e-003	0.1129	0.0296	1.0200e-003	0.0307		127.1422	127.1422	7.2600e-003		127.2948
<b>Total</b>	<b>5.3465</b>	<b>37.4573</b>	<b>26.2576</b>	<b>0.0881</b>	<b>2.1638</b>	<b>0.6178</b>	<b>2.7814</b>	<b>0.5914</b>	<b>0.5680</b>	<b>1.1594</b>		<b>9,097.1512</b>	<b>9,097.1512</b>	<b>0.0802</b>		<b>9,098.8361</b>

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.4524	0.0000	2.4524	1.3040	0.0000	1.3040			0.0000			0.0000
Off-Road	2.9629	31.2324	20.1834	0.0206		1.7508	1.7508		1.6108	1.6108		2,162.1157	2,162.1157	0.6455		2,175.6708
<b>Total</b>	<b>2.9629</b>	<b>31.2324</b>	<b>20.1834</b>	<b>0.0206</b>	<b>2.4524</b>	<b>1.7508</b>	<b>4.2033</b>	<b>1.3040</b>	<b>1.6108</b>	<b>2.9148</b>		<b>2,162.1157</b>	<b>2,162.1157</b>	<b>0.6455</b>		<b>2,175.6708</b>

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**3.4 Grading - 2015**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	5.1207	37.3953	25.4930	0.0881	33.2161	0.6165	33.8325	8.2112	0.5670	8.7782		8,970.009 0	8,970.009 0	0.0729		8,971.540 6
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.2258	0.0520	0.7546	1.4500e-003	0.1118	1.1200e-003	0.1129	0.0296	1.0200e-003	0.0307		127.1422	127.1422	7.2600e-003		127.2945
<b>Total</b>	<b>5.3465</b>	<b>37.4673</b>	<b>26.2678</b>	<b>0.0888</b>	<b>33.3278</b>	<b>0.6178</b>	<b>33.9464</b>	<b>8.2408</b>	<b>0.5680</b>	<b>8.8088</b>		<b>9,097.161 2</b>	<b>9,097.161 2</b>	<b>0.0802</b>		<b>9,098.896 1</b>

**3.5 Building Construction - 2015**

Unmitigated Construction On-Site

Acres of Paving: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	4.0268	25.8389	17.0465	0.0249		1.7597	1.7597		1.6870	1.6870		2,364.079 7	2,364.079 7	0.5662		2,375.970 1
<b>Total</b>	<b>4.0268</b>	<b>25.8389</b>	<b>17.0465</b>	<b>0.0249</b>		<b>1.7597</b>	<b>1.7597</b>		<b>1.6870</b>	<b>1.6870</b>		<b>2,364.079 7</b>	<b>2,364.079 7</b>	<b>0.5662</b>		<b>2,375.970 1</b>

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**3.5 Building Construction - 2015**

Unmitigated Construction Off-Site

Acres of Paving: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0343	0.1978	0.2221	4.4000e-004	0.0125	3.3100e-003	0.0158	3.5500e-003	3.0500e-003	6.5900e-003		44.5238	44.5238	3.6000e-004		44.5313
Worker	0.1806	0.0496	0.6117	1.1600e-003	0.0894	8.9000e-004	0.0903	0.0237	8.2000e-004	0.0245		101.7137	101.7137	5.8000e-003		101.8355
<b>Total</b>	<b>0.2149</b>	<b>0.2474</b>	<b>0.8337</b>	<b>1.6000e-003</b>	<b>0.1019</b>	<b>4.2000e-003</b>	<b>0.1061</b>	<b>0.0273</b>	<b>3.8700e-003</b>	<b>0.0311</b>		<b>146.2376</b>	<b>146.2376</b>	<b>8.1600e-003</b>		<b>146.3889</b>

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	4.0231	25.8152	17.0309	0.0249		1.7581	1.7581		1.6855	1.6855	0.0000	2,361.910 8	2,361.910 8	0.5657		2,373.790 3
<b>Total</b>	<b>4.0231</b>	<b>25.8152</b>	<b>17.0309</b>	<b>0.0249</b>		<b>1.7581</b>	<b>1.7581</b>		<b>1.6855</b>	<b>1.6855</b>	<b>0.0000</b>	<b>2,361.910 8</b>	<b>2,361.910 8</b>	<b>0.5657</b>		<b>2,373.790 3</b>

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**3.5 Building Construction - 2015**

Mitigated Construction Off-Site

Acres of Paving: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0343	0.1978	0.2221	4.4000e-004	0.0125	3.3100e-003	0.0158	3.5500e-003	3.0500e-003	6.5900e-003		44.5238	44.5238	3.6000e-004		44.5313
Worker	0.1806	0.0496	0.5117	1.1600e-003	0.0894	8.9000e-004	0.0903	0.0237	8.2000e-004	0.0245		101.7137	101.7137	5.8000e-003		101.8356
<b>Total</b>	<b>0.2148</b>	<b>0.2474</b>	<b>0.8337</b>	<b>1.8000e-003</b>	<b>0.1018</b>	<b>4.2000e-003</b>	<b>0.1081</b>	<b>0.0273</b>	<b>3.8700e-003</b>	<b>0.0311</b>		<b>146.2376</b>	<b>146.2376</b>	<b>8.1800e-003</b>		<b>148.3889</b>

**3.6 Paving - 2015**

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.9443	19.7532	12.2652	0.0176		1.2418	1.2418		1.1437	1.1437		1,823.2763	1,823.2763	0.5345		1,834.5006
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>1.9443</b>	<b>19.7532</b>	<b>12.2652</b>	<b>0.0176</b>		<b>1.2418</b>	<b>1.2418</b>		<b>1.1437</b>	<b>1.1437</b>		<b>1,823.2763</b>	<b>1,823.2763</b>	<b>0.5345</b>		<b>1,834.5006</b>

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**3.6 Paving - 2015**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.3387	0.0930	1.1469	2.1800e-003	0.1677	1.6800e-003	0.1693	0.0445	1.5300e-003	0.0460		190.7132	190.7132	0.0109		190.9418
<b>Total</b>	<b>0.3387</b>	<b>0.0930</b>	<b>1.1469</b>	<b>2.1800e-003</b>	<b>0.1677</b>	<b>1.6800e-003</b>	<b>0.1693</b>	<b>0.0445</b>	<b>1.5300e-003</b>	<b>0.0460</b>		<b>190.7132</b>	<b>190.7132</b>	<b>0.0109</b>		<b>190.9418</b>

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.9425	19.7350	12.2540	0.0176		1.2407	1.2407		1.1427	1.1427	0.0000	1,821.6036	1,821.6036	0.5340		1,832.5175
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>1.9425</b>	<b>19.7350</b>	<b>12.2540</b>	<b>0.0176</b>		<b>1.2407</b>	<b>1.2407</b>		<b>1.1427</b>	<b>1.1427</b>	<b>0.0000</b>	<b>1,821.6036</b>	<b>1,821.6036</b>	<b>0.5340</b>		<b>1,832.5175</b>

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**3.6 Paving - 2015**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.3387	0.0930	1.1469	2.1800e-003	0.1677	1.6900e-003	0.1693	0.0445	1.5300e-003	0.0460		190.7132	190.7132	0.0109		190.9418
<b>Total</b>	<b>0.3387</b>	<b>0.0930</b>	<b>1.1469</b>	<b>2.1800e-003</b>	<b>0.1677</b>	<b>1.6900e-003</b>	<b>0.1693</b>	<b>0.0445</b>	<b>1.5300e-003</b>	<b>0.0460</b>		<b>190.7132</b>	<b>190.7132</b>	<b>0.0109</b>		<b>190.9418</b>

**3.7 Architectural Coating - 2015**

Unmitigated Construction On-Site

Residential Indoor: 217,131; Residential Outdoor: 72,377; Non-Residential Indoor: 0; Non-Residential Outdoor: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	36.4639					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.4066	2.5703	1.9018	2.9700e-003		0.2209	0.2209		0.2209	0.2209		281.4481	281.4481	0.0367		282.2177
<b>Total</b>	<b>36.8706</b>	<b>2.5703</b>	<b>1.9018</b>	<b>2.9700e-003</b>		<b>0.2209</b>	<b>0.2209</b>		<b>0.2209</b>	<b>0.2209</b>		<b>281.4481</b>	<b>281.4481</b>	<b>0.0367</b>		<b>282.2177</b>

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**3.7 Architectural Coating - 2015**

Unmitigated Construction Off-Site

Residential Indoor: 217,131; Residential Outdoor: 72,377; Non-Residential Indoor: 0; Non-Residential Outdoor: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0462	0.0124	0.1629	2.9000e-004	0.0224	2.2000e-004	0.0226	5.9300e-003	2.0000e-004	6.1300e-003		25.4284	25.4284	1.4500e-003		25.4589
<b>Total</b>	<b>0.0462</b>	<b>0.0124</b>	<b>0.1629</b>	<b>2.9000e-004</b>	<b>0.0224</b>	<b>2.2000e-004</b>	<b>0.0226</b>	<b>6.8300e-003</b>	<b>2.0000e-004</b>	<b>6.1300e-003</b>		<b>25.4284</b>	<b>25.4284</b>	<b>1.4600e-003</b>		<b>25.4688</b>

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	36.4639					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.4062	2.5680	1.9000	2.9700e-003		0.2207	0.2207		0.2207	0.2207	0.0000	281.1898	281.1898	0.0366		281.9597
<b>Total</b>	<b>36.8701</b>	<b>2.5680</b>	<b>1.9000</b>	<b>2.9700e-003</b>		<b>0.2207</b>	<b>0.2207</b>		<b>0.2207</b>	<b>0.2207</b>	<b>0.0000</b>	<b>281.1898</b>	<b>281.1898</b>	<b>0.0366</b>		<b>281.8687</b>

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3.7 Architectural Coating - 2015

Mitigated Construction Off-Site

Residential Indoor: 217,131; Residential Outdoor: 72,377; Non-Residential Indoor: 0; Non-Residential Outdoor: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0452	0.0124	0.1529	2.9000e-004	0.0224	2.2000e-004	0.0226	5.9300e-003	2.0000e-004	6.1300e-003		25.4284	25.4284	1.4500e-003		25.4589
<b>Total</b>	<b>0.0462</b>	<b>0.0124</b>	<b>0.1529</b>	<b>2.9000e-004</b>	<b>0.0224</b>	<b>2.2000e-004</b>	<b>0.0228</b>	<b>6.8300e-003</b>	<b>2.0000e-004</b>	<b>6.1300e-003</b>		<b>25.4284</b>	<b>25.4284</b>	<b>1.4500e-003</b>		<b>25.4589</b>

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.7881	2.6485	10.9049	0.0256	1.6819	0.0390	1.7209	0.4497	0.0359	0.4856		2,253,623 1	2,253,623 1	0.0933		2,255,581 3
Unmitigated	2.7881	2.6485	10.9049	0.0256	1.6819	0.0390	1.7209	0.4497	0.0359	0.4856		2,253,623 1	2,253,623 1	0.0933		2,255,581 3

4.2 Trip Summary Information

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Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Single Family Housing	220.11	231.84	201.71	748,893	748,893
<b>Total</b>	<b>220.11</b>	<b>231.84</b>	<b>201.71</b>	<b>748,893</b>	<b>748,893</b>

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

4.4 Fleet Mix

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.533598	0.058434	0.178244	0.125508	0.038944	0.006283	0.016425	0.031066	0.002453	0.003157	0.003691	0.000543	0.001655

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
NaturalGas Mitigated	0.0203	0.1731	0.0736	1.1000e-003	0.0140	0.0140	0.0140	0.0140	0.0140	0.0140	220.9256	220.9256	4.2300e-003	4.0500e-003	222.2701	
NaturalGas Unmitigated	0.0203	0.1731	0.0736	1.1000e-003	0.0140	0.0140	0.0140	0.0140	0.0140	0.0140	220.9256	220.9256	4.2300e-003	4.0500e-003	222.2701	

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5.2 Energy by Land Use - NaturalGas

Unmitigated

Land Use	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Single Family Housing	1877.87	0.0203	0.1731	0.0736	1.1000e-003	0.0140	0.0140	0.0140	0.0140	0.0140	0.0140	220.9256	220.9256	4.2300e-003	4.0500e-003	222.2701	
<b>Total</b>		<b>0.0203</b>	<b>0.1731</b>	<b>0.0736</b>	<b>1.1000e-003</b>	<b>0.0140</b>	<b>0.0140</b>	<b>0.0140</b>	<b>0.0140</b>	<b>0.0140</b>	<b>0.0140</b>	<b>220.9256</b>	<b>220.9256</b>	<b>4.2300e-003</b>	<b>4.0500e-003</b>	<b>222.2701</b>	

Mitigated

Land Use	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Single Family Housing	1,877.87	0.0203	0.1731	0.0736	1.1000e-003	0.0140	0.0140	0.0140	0.0140	0.0140	0.0140	220.9256	220.9256	4.2300e-003	4.0500e-003	222.2701	
<b>Total</b>		<b>0.0203</b>	<b>0.1731</b>	<b>0.0736</b>	<b>1.1000e-003</b>	<b>0.0140</b>	<b>0.0140</b>	<b>0.0140</b>	<b>0.0140</b>	<b>0.0140</b>	<b>0.0140</b>	<b>220.9256</b>	<b>220.9256</b>	<b>4.2300e-003</b>	<b>4.0500e-003</b>	<b>222.2701</b>	

6.0 Area Detail

6.1 Mitigation Measures Area

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	8.4403	0.1754	13.4847	0.0185		1.7673	1.7673		1.7670	1.7670	215.4391	417.4167	632.8558	0.6460	0.0146	650.9540
Unmitigated	8.4403	0.1754	13.4847	0.0185		1.7673	1.7673		1.7670	1.7670	215.4391	417.4167	632.8558	0.6460	0.0146	650.9540

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2298					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.1231					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	6.0268	0.1529	11.5608	0.0184		1.7569	1.7569		1.7567	1.7567	215.4391	414.0000	629.4391	0.6425	0.0146	647.4642
Landscaping	0.0606	0.0225	1.9240	1.0000e-004		0.0104	0.0104		0.0104	0.0104		3.4167	3.4167	3.4800e-003		3.4898
<b>Total</b>	<b>8.4402</b>	<b>0.1764</b>	<b>13.4847</b>	<b>0.0186</b>		<b>1.7673</b>	<b>1.7673</b>		<b>1.7670</b>	<b>1.7670</b>	<b>215.4391</b>	<b>417.4167</b>	<b>632.8558</b>	<b>0.6460</b>	<b>0.0148</b>	<b>650.9540</b>

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6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2298					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.1231					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	6.0268	0.1529	11.5608	0.0184		1.7569	1.7569		1.7567	1.7567	215.4391	414.0000	629.4391	0.6425	0.0146	647.4642
Landscaping	0.0606	0.0225	1.9240	1.0000e-004		0.0104	0.0104		0.0104	0.0104		3.4167	3.4167	3.4800e-003		3.4898
<b>Total</b>	<b>8.4402</b>	<b>0.1764</b>	<b>13.4847</b>	<b>0.0186</b>		<b>1.7673</b>	<b>1.7673</b>		<b>1.7670</b>	<b>1.7670</b>	<b>215.4391</b>	<b>417.4167</b>	<b>632.8558</b>	<b>0.6460</b>	<b>0.0148</b>	<b>650.9540</b>

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

10.0 Vegetation

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## **APPENDIX D – PHASE I HAZARDOUS MATERIALS AND HAZARDS ASSESSMENT**

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**PHASE I ENVIRONMENTAL SITE ASSESSMENT**

**4422 AND 4436 BANNISTER AVENUE  
AND PARCEL TO THE EAST/SOUTHEAST  
EL MONTE, CA 91732**

**November 5, 2014**

**Prepared For:  
BALDWIN PARK HOMES LLC  
1773 San Bernardino Road  
Suite B-42  
West Covina, CA 91791**



Phase I Site Assessments • Subsurface Investigations  
Underground Tank Removal/Closure • Site Remediation

**2416 Foothill Boulevard  
La Crescenta, California 91214**

**(818) 249-5116  
FAX: (818) 249-9387**



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La Crescenta, California 91214

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email: [athanor@pacbell.net](mailto:athanor@pacbell.net)  
[www.athanorenvironmental.com](http://www.athanorenvironmental.com)

November 5, 2014

Mr. Donald L. Cook  
President  
Baldwin Park Homes LLC  
1773 San Bernardino Road  
Suite B-42  
West Covina, CA 91791

**Re: Phase I Site Assessment of 4422 and 4436 Bannister Avenue and the Parcel to the East/Southeast, El Monte, CA 91732**

Dear Mr. Cook:

Athanor Environmental Services, Inc. is pleased to submit this report on our phase I environmental site assessment of 4422 and 4436 Bannister Avenue and the parcel to the east/southeast, El Monte, CA 91732. The report includes a discussion of our inspection of the site and surrounding properties, a discussion of the environmental setting, a history of the site, a review of records obtained from relevant regulatory agencies, asbestos and lead surveys and laboratory reports, and a search of all known hazardous waste sites within a one mile radius. It also includes site photographs.

If you have any questions, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "George A. Johnson".

George A. Johnson  
President  
Environmental Professional

**PHASE I ENVIRONMENTAL SITE ASSESSMENT**

**4422 AND 4436 BANNISTER AVENUE  
AND PARCEL TO THE EAST/SOUTHEAST  
EL MONTE, CA 91732**

**November 5, 2014**

**Prepared For:  
BALDWIN PARK HOMES LLC  
1773 San Bernardino Road  
Suite B-42  
West Covina, CA 91791**

**Prepared By:  
ATHANOR ENVIRONMENTAL SERVICES, INC.  
2416 Foothill Boulevard  
La Crescenta, CA 91214**

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## **1.0 INTRODUCTION**

### **1.1 Scope of Work and Purpose**

Athamor Environmental Services (Athamor) was contracted by Baldwin Park Homes LLC to perform this Phase I Environmental Site Assessment (ESA) of the property located at 4422 and 4436 Bannister Avenue and the parcel adjacent to the east/southeast, El Monte, California 91732 (the "Site").

The purpose of the Phase I ESA is to identify recognized environmental conditions associated with the historical use of the property, the physical condition of the property, and present operational practices. The Standard Practice for Site Assessments: Phase I Environmental Site Assessment Process (E 1527-13), as issued by the American Society for Testing and Materials (ASTM), defines recognized environmental conditions as follows: "The presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property (ASTM E 1527)."

This Phase I ESA was conducted in accordance with ASTM E-1527-13. A Phase I ESA consists of four general elements: (1) a records review, (2) a site reconnaissance, (3) interviews, and (4) a report. The first three elements are conducted to identify recognized environmental conditions related to the subject property. The Phase I ESA report provides the evaluation and results of the other three elements.

**1.2 Limitations and Exceptions of the Assessment**

ASTM E-1527-13 acknowledges that “...no environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property.” The ESA “...is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with a property, and ...recognize reasonable limits of time and cost.” The ASTM E-1527-13 goes on to report: “[t]here is a point at which the cost of information obtained or the time required to gather it outweighs the usefulness of the information and, in fact, may be a material detriment to the orderly completion of transactions.”

Athanor has performed this Phase I ESA in conformance with the scope and limitations of ASTM E-1527-13. No exceptions to, or deletions from, this protocol were required, except that aerial photography was not readily available for every five-year period back to a time when the property was undeveloped.

**1.3 Limiting Conditions and Methodology Used**

This assessment was completed by the following Athanor environmental professional in conjunction with client representatives:

George Johnson, President, Environmental Professional  
Anne Marie Johnson, Vice President, Environmental Professional  
Marcus Peterson, Associate, Environmental Professional

Mr. Johnson, Ms. Johnson, and Mr. Peterson are all qualified Environmental Professionals. The United States Environmental Protection Agency (EPA) definition of an Environmental Professional qualified to conduct “all appropriate inquiries,” the process of evaluating a

property's environmental conditions and assessing potential liability for any contamination, is guided by the 2002 Brownfields Amendments to CERCLA which require EPA to develop regulations establishing standards and practices for conducting all appropriate inquiries. The final rule was effective on November 1, 2006—one year after its publication date in the Federal Register. Until November 1, 2006, both the standards and practices included in the final regulation and the current interim standard established by Congress for all appropriate inquiries (ASTM E1527-00) will satisfy the statutory requirements for the conduct of all appropriate inquiries.

To ensure the quality of all appropriate inquiries, the final rule includes specific educational a experience requirements for an environmental professional. The definition applies only to persons conducting all appropriate inquiries for the specific purposes outlined in the final rule. The final rule defines an environmental professional as someone who possesses sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases of hazardous substances on, at, in, or to a property, sufficient to meet the objectives and performance factors of the rule. At a minimum, an environmental professional must have ten years of relevant full-time work experience. For the purposes of qualifying as an environmental professional, "relevant experience" means participation in the performance of environmental site assessments that may include environmental analyses, investigations, and remediation which involve the understanding of surface and subsurface environmental conditions and the processes used to evaluate these conditions and for which professional judgment was used to develop opinions regarding conditions indicative of releases of hazardous substances.

This assessment report contains the results of a reconnaissance of the subject property and surrounding properties conducted on October 27, 2014; a review of property, government, and historical records; and interviews with Mr. Donald Cook and Mr. Craig Cook, who are familiar

with the property and surrounding properties. Representatives of the surrounding properties were unavailable at the time of the site inspection.

A report check list is included in Appendix E.

Information used to complete this ESA was reasonably ascertainable, and visually and physically observable. This ESA did not include any testing or sampling of materials (e.g., oil, water, sediment, etc.).

#### **1.4 Report Organization**

The report consists of the following sections:

Section 1, Introduction, provides the basis for the report.

Section 2, Site Characteristics, describes the property features and layout; the current and historical uses of the subject property and the current uses of the surrounding area.

Section 3, Environmental Setting, describes the natural characteristics of the site including soils, surface water, and groundwater.

Section 4, Results of Investigation, includes information based on observations made during the property inspection and information obtained from interviews with knowledgeable personnel; provides historical information obtained from maps, aerial photographs, and building permit records; and presents a literature search of information regarding the subject property. This section includes the environmental database search and publicly available and practically reviewable information obtained from local regulatory agencies.

Section 5, Conclusions, summarizes the findings and presents any recognized environmental conditions.

Section 6, Recommendations, provides recommendations for further action, if appropriate.

Section 7, Limitations.

Section 8, Reliance on report.

Section 9, References, presents a list of the materials used or obtained during the conduct of the ESA.

Section 10, Qualifications of Personnel, presents the qualifications of the personnel who contributed to this report.

The appendices include documents used to complete the Phase I ESA:

- Appendix A contains figures and maps of the Site.
- Appendix B selected photographs taken during the site visit.
- Appendix C contains the environmental database search.
- Appendix D contains the user questionnaire.
- Appendix E contains the report check list.
- Appendix F contains the asbestos laboratory report.
- Appendix G contains the lead laboratory report.

## **2.0 GENERAL SITE CHARACTERISTICS**

### **2.1 Location**

The Site is located at 4422 and 4436 Bannister Avenue and the parcel adjacent to the east/southeast, El Monte, California 91732. The site vicinity map is included in Appendix A as Figure 1. The Site is located on the west side of the 60 Freeway and the San Gabriel River. It is north of Ramona Boulevard. It is designated as Los Angeles County Assessor Nos. 8545-025-900, 8545-025-901 and 8545-025-017.

### **2.2 Site Description and Use**

The three-parcel Site has three vacant residential buildings, paved driveways and parking, and vacant land. A layout of the Site is included in Appendix A as Figure 2. The three parcels total approximately three acres. 4436 Bannister Avenue is owned by Baldwin Park Homes LLC, David Cook. The other two parcels are owned by El Monte Union High School District.

The three buildings are located on the parcel at 4436 Bannister Avenue. A layout of this parcel is included in Appendix A as Figure 4. The buildings are wood frame and stucco, with a slab-on-grade foundations, and slanted composition roofs. An aerial of the parcel is included in Appendix A as Figure 3. Building #1 is 607 square feet and was built in 1961 (Photo 1). Building #2 is 948 square feet and built in 1957 (Photos 2 and 3). Building #3 is 803 square feet and built in 1949 (Photo 4). The interiors have wood, wallpaper, and plaster walls and ceilings, and carpeting, ceramic tile, and vinyl tile flooring (Photos 5-11). There is also a shed in the northeast corner of this parcel (Photos 12 and 13).

The 4422 Bannister Avenue parcel is rectangular, vacant land covered with native vegetation (Photos 14-16).

The third parcel has no address. It is designated by the Los Angeles County Assessor as #8545-025-900. It is a triangular strip on land east of the other two parcels and it extends to the south along the San Gabriel River (Photos 16-19). There are stables located in the center of this parcel (Photos 20-22).

**2.3 Adjacent and Surrounding Properties**

The Site is located in a residential area of El Monte. An aerial photograph of the Site and surrounding properties is included in Appendix A as Figure 3. Single family residences are located to the west, north and south along Bannister Avenue (Photos 23-25). The San Gabriel River is located to the east (Photo 26). Vacant land and a high school are located to the south (Photo 17).

### **3.0 ENVIRONMENTAL SETTING**

#### **3.1 Regional Physiographic and Geologic Conditions**

The subject site and vicinity are located in the south-central portion of the San Gabriel Valley within the Transverse Ranges geomorphic province. The San Gabriel Valley is bounded by the San Gabriel Mountains on the north, the Chino Valley on the east, the San Jose Hills on the southeast, the Puente Hills on the south, the La Merced Hills on the southwest, and the Verdugo Hills on the northwest. The site ranges in approximate elevation from 315 to 325 feet above mean sea level on terrain that slopes gently downward to the south toward the Whittier Narrows Flood Control Basin (USGS, 1978).

The San Gabriel Valley is underlain by several thousands of feet of alluvium and associated deposits of Recent or Pleistocene age. The surficial unit underlying the site is “younger” alluvial fan material of Quaternary age (California Division of Mines and Geology, 1969). These sediments consist of unconsolidated, poorly stratified to well-stratified clay, silt, sand, and gravel on streambed deposits and alluvial fans. The immediately underlying subsoils were deposited by alluvial processes during the past 11,000 years (Holocene Epoch) and originate in the surrounding hills.

#### **3.2 Soil Conditions**

Soils in the area of the subject property are mapped as the Tujunga-Soboba association, which occurs on nearly level and gently sloping alluvial fans (USDA, 1969). The Tujunga soils are characterized as somewhat excessively drained and are rapidly permeable. In a typical profile, a sand or loamy fine sand surface layer is underlain by similar substratum which may be stratified. These soils are slightly acid to mildly alkaline throughout. The Soboba soils are excessively drained and have very rapid subsoil permeability. A typical profile consists of a cobbly very fine

sandy loam surface layer about 4 inches thick underlain by very cobbly loamy coarse sand that becomes calcareous in the lower part. Gravel and cobbles comprise 35 percent or more of the soil profile. Tujunga soils make up about 60 percent and Soboba soils about 30 percent of the association. The remaining 10 percent is composed of unnamed sandy and cobbly material in the beds of intermittent streams.

A topographic vicinity map is included in Appendix A as Figure 5.

### **3.3 Groundwater Conditions**

The subject site is located in the south central portion of the Main San Gabriel Basin approximately three miles northeast of its outlet at Whittier Narrows. Groundwater contours mapped by the Los Angeles County Department of Public Works, Hydraulic/Water Conservation Division in Fall 1993 indicate that the depth to groundwater is approximately 80 feet below ground surface (bgs), and the direction of the groundwater gradient is to the southwest, paralleling flow in the nearby San Gabriel River (LACDPW, 1995).

Four observation wells were identified in LACDPW (2014) on-line records within approximately one mile of the site. Information for representative wells follows:

- Well No. 2993W – Located approximately 0.5 mile south-southwest on Gilman Road at Twin Lakes Elementary School, groundwater was measured at 102.2 feet bgs in October 2010.
- Well No. 2991T – Located approximately 0.9 mile northwest on Lower Azusa Road south of Dyson Street, groundwater was measured at 128 feet bgs in October 2013.

#### **4.0 RESULTS OF INVESTIGATION**

##### **4.1 Site Inspection**

On October 27, 2014, George Johnson and Anne Marie Johnson, Athanor Environmental Services, conducted an inspection of the Site. Athanor was not able to get access to 4422 Bannister Avenue or the triangular strip east of the other two parcels but took photographs of the two parcels. Photographs taken by the Consultant during the Site inspection are included in Appendix B.

The Site includes three parcels totaling 3.158 acres. The Site is currently unoccupied except by stables.

##### **Hazardous Materials**

There are containers of chemicals outside building #3 (Photo 11). A shed in the northeast corner of 4436 Bannister Avenue has cans of paint and other chemicals (Photos 12 and 27). No other hazardous materials were observed onsite.

##### **Underground Storage Tanks (USTs)**

Based on the available evidence, no USTs are currently located at the Site. No USTs are known to have been installed or operated on the premises in past years.

##### **Aboveground Storage Tank (ASTs)**

No ASTs were observed on the Site. No ASTs are known to have been installed or operated on the premises in past years.

#### **Waste Generation, Storage, and Disposal**

The Site does not appear on the RCRA generator list. No evidence was found to indicate that hazardous wastes were disposed on the subject property.

#### **Water and Wastewater**

Power is supplied to the Site by Southern California Edison (SCE). Water is provided by the City of El Monte. Natural gas service is provided by Southern California Gas Company. The sanitary facilities on the Site are connected to the public sewer system.

#### **Air Emissions**

There are no air emissions.

#### **Asbestos Containing Materials (ACM)**

Laboratory analysis of suspect ACM samples detected no asbestos in the vinyl floor tile in building #1 (Photo 7) and the thermal insulation wrap in the shed (Photo 28). This is discussed in more detail in Section 4.2.

#### **Wells and Septic System**

There are no wells or septic systems.

#### **Pits, Ponds, or Lagoons**

There are no pits, ponds, or lagoons.

### **Lead-Based Paint**

Laboratory analysis of suspect lead-based paint in Building #1 detected no lead. This is discussed in more detail in Section 4.2.

### **Polychlorinated Biphenyls (PCBs)**

Polychlorinated biphenyls (PCBs) were commonly used in dielectric fluids in transformers, capacitors, and hydraulic equipment as a result of their desirable thermal characteristics. Due to the demonstrated toxicity and persistence in the environment, PCB manufacturing in the United States was discontinued in approximately 1978. No equipment containing PCBs was observed onsite.

### **Radon**

A radon survey was not conducted at the Site. Radon occurs naturally and randomly in geographic settings. The California Department of Health Services (CDHS) conducted a statewide radon survey during 1990-1991 which entailed testing for radon in homes in designated geographic areas. According to this survey, radon devices were placed in homes throughout the county. Radon concentrations detected in Los Angeles County averaged approximately 0.5 picoCuries per liter. The Environmental Protection Agency (EPA) safety standard for radon gas in residences is 4.0 picoCuries per liter and the United States National Council on Radiation Protection and Measurements (NCRP) standard is 8.0 picoCuries per liter.

Based on this study, radon gas is not considered a concern for the Site at this time.

#### **Owner/User Specialized Knowledge**

Mr. Donald Cook is unaware of any environmental liens or activity and use limitations (AUL) for the Site. He is unaware of any reason for value reduction for environmental issues. He is unaware of environmental cleanups that have taken place at the property. The user questionnaire is included in Appendix D.

#### **4.2 Asbestos and Lead-Based Paint Sampling and Laboratory Results**

On October 27, 2014, in conjunction with the phase I site assessment site inspection, samples of damaged vinyl floor tile and insulation were collected in the building by Mr. George Johnson of Athanor. The purpose was to determine if asbestos-containing material (ACM) is present. The sampled floor tile and insulation materials were analyzed by a state-certified analytical laboratory, LA Testing of South Pasadena, CA, using the polarized light microscopy method, in accordance with EPA Method 600/R-93/116 and/or EPA Method 600/M-4-82-020, December, 1982. No asbestos was detected. The laboratory report is included in Appendix F.

On October 27, 2014 in conjunction with the phase I site assessment inspection, a sample of suspect lead-based paint was collected by Mr. George Johnson of Athanor. The purpose was to determine if lead-based paint is present. The sample was analyzed by a state-certified analytical laboratory, LA Testing, by Method SW846-7000B (7420) by flame atomic absorption. No lead was detected. The laboratory report is included in Appendix G.

#### **4.3 Regulatory Agency List Review**

Athanor Environmental Services retained Environmental Data Resources Inc. of Milford, Connecticut, to provide a comprehensive list of sites within the Site vicinity that are currently under review, management, or notification by a regulatory agency (Appendix C).

The following regulatory agency lists were reviewed:

- Los Angeles County Fire Department, Health Hazardous Materials Division
- California Regional Water Quality Control Board, Los Angeles Region
- South Coast Air Quality Management District
- California Department of Toxic Substance Control
- Los Angeles County Department of Health Services
- Los Angeles County Department of Public Works
- Los Angeles County Sanitation Districts

#### **FEDERAL DATABASES**

##### **Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS)**

A listing of facilities which represent environmental concerns from the discharge of hazardous materials by hazardous waste generators, treatment and storage facilities, and hazardous waste disposal facilities. The listing includes facilities subject to investigation under the state superfund program and federal Comprehensive Environmental Response Compensation and Liability Act (CERCLA) programs.

**Not on the CERCLA facility list.** No CERCLA site is identified within a one-eighth mile radius.

##### **No Further Remedial Action Planned sites (NFRAP)**

A listing which contains information pertaining to sites which have been removed from the federal EPA's CERCLIS database. NFRAP sites may be sites where following an initial

investigation no contamination was found, contamination was removed quickly without need for the site to be placed on the NPL, or the contamination was not serious enough to require federal superfund action or NPL consideration.

**Not on the NFRAP list.** No NFRAP site is identified within a one-eighth mile radius.

**The Environmental Protection Agency (EPA), National Priority List (NPL)**

A listing of hazardous waste generators which are, or proposed to be, EPA-enforced Superfund sites.

**Not on the NPL list.** No NPL facilities were identified on this list within a one-eighth mile radius of the Site.

**Emergency Response Notification System (ERNS)**

A national computer database system that is used to store information on the sudden and/or accidental release of hazardous substances, including petroleum into the environment.

**Not on the ERNS list.** No ERNS facilities were identified on this list within a one-eighth mile radius of the Site.

**National Priority List (NPL)**

A list of all sites on the National Priority list for USEPA cleanup.

**Not on the NPL list.** No NPL facilities were identified on this list within a one-eighth mile radius of the Site.

**Resource Conservation and Recovery Information System (RCRIS)**

A list developed and maintained by the EPA that identifies hazardous waste generators and hazardous waste treatment and disposal (TSD) facilities. The purpose of this listing is to summarize registration of Hazardous Waste Generators and does not imply that contamination has occurred on the property, but does identify potential sources of contamination.

**Not on the RCRIS list.** No RCRIS site is identified on this list within a one-eighth mile radius of the Site.

**STATE DATABASES**

**The CalSites Database (SCL) (SPL)**

The state equivalent of the CERCLIS list. This is a list of properties formerly contained in lists maintained by the Abandoned Sites Program Information System (ASPIS), the Annual Workplan, and the Bond Expenditure Plan. These properties represent both potential and verified contaminated properties. Names may remain on this list even though a determination has been made that no leak had occurred and no further action is required to protect the environment or public health.

**Not on the SCL/SPL list.** No SCL/SPL site is identified on this list within a one-eighth mile radius of the Site.

**Solid Waste Information System/Landfills (SWLF)**

The California Integrated Waste Management Board maintains an inventory of both open, as well as, closed and inactive solid waste disposal facilities and transfer stations pursuant to the Solid Waste Management and Resource Recovery Act of 1972.

**Not on the SWLF facility list.** No SWLF site is identified within a one-eighth mile radius.

**Regional Water Quality Control Board Leaking Underground Storage Tanks (LUST) list**

This is a list which compiles the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Board (RWQCB) identified sites that have had unauthorized releases from underground storage tanks (USTs) and non-tank spills.

One LUST site is identified within a one-eighth mile radius: Valle Lindo Continuation High School, 12347 Ramona Boulevard, El Monte, CA 91732; gasoline soil contamination, site remediation, 8/31/01 RWQCB closure letter. This site poses no threat to the Site.

**California Underground Storage Tank (UST) List**

A comprehensive listing of all registered underground storage tanks located within the State of California.

**Not on the UST facility list.** No UST site is identified within a one-eighth mile radius.

**Hazardous Waste Manifest (HW Manifest) List**

A list of all California Department of Toxic Substances Control (DTSC) hazardous waste manifest sites.

Three HW Manifest sites are identified within a one-eighth mile radius: El Monte Union High School District, 12347 Ramona Boulevard, El Monte, CA 91731; EMUHSD-Fernando Ledesma High School, 12347 Ramona Boulevard, El Monte, CA 91732; Robert Lawe, 4315 Durfee Avenue, El Monte, CA 91732. None of these sites poses a threat to the Site.

**ENVIROSTOR List**

A listing of all sites listed by DTSC.

One site was listed within a one-eighth mile radius: Valle Lindo Continuation High School, 12347 Ramona Boulevard, El Monte, CA 91732; chemicals were removed under a Voluntary Cleanup Agreement; a 7/27/12 DTSC cost recovery closeout memo was issued. This site is no threat to the Site.

**State Spills List**

A list of all state spills sites not elsewhere covered.

**Not on the State Spills list.** No State Spills site is identified within a one-eighth mile radius.

**LOCAL REGULATORY AGENCY**

**Los Angeles County Fire Department, Health Hazardous Materials Division**

The lead agency for the enforcement of underground storage tank and hazardous materials management regulations in El Monte.

**Not on the Fire Department list.** No UST site is identified within a one-eighth mile radius.

**4.4 Site History/Land Use Review**

**Interview(s)**

An interview was conducted with Mr. Donald Cook and Mr. Craig Cook, who are familiar with the Site. The Site was formerly an orchard, residences, and vacant undeveloped property.

**Historical Aerial Photographs**

Historical aerial photographs of the Site and Site vicinity were reviewed in order to ascertain historical land use and to identify evidence of hazardous material generation or storage. A review of historical aerial photographs of the subject property determined the following information about the subject property:

<u>Date</u>	<u>Description</u>
1938	The north and south Site parcels fronting on Bannister Avenue are occupied by orchards. The east Site parcel is vacant, undeveloped land adjacent to the west of the San Gabriel River.

- 1952 The original residence appears on the east side of the north Site parcel. A former apparent residence is situated on the east side of the south Site parcel. Both appear otherwise vacant. The east parcel remains vacant, undeveloped land along the river.
- 1964 The three existing residences are in place on the north Site parcel. The former structure is removed from the south Site parcel, and another former apparent residence is in place near the southeast corner, sharing an access drive with the property adjacent to the south. The east Site parcel appears unchanged from 1952.
- 1972 The Site appears unchanged from 1964.
- 1985 Some small sheds are built on the east parcel, south of the other two parcels comprising the Site. The Site otherwise appears unchanged from 1972.
- 1997 The former structure is removed from the south Site parcel, which is vacant and undeveloped. A few more sheds appear centrally on the east parcel in the area south of the rest of the Site. The north Site parcel appears unchanged from 1985.
- 2003 The north and south Site parcels appear unchanged from 1997. The north and south portions of the east parcel are undeveloped, and the central area houses sheds, corrals, and fenced areas that appear to be encroachments from the residential properties adjacent to the west.
- 2013 Some of the sheds are removed from the central portion of the east Site parcel, and a few more are in place at the north tip. A larger area at the south end is

vacant. The north and south Site parcels appear unchanged from 2003 and the Site appears as it does today.

#### **Historic Sanborn Fire Insurance Maps**

Sanborn Fire Insurance Maps provide information on commercial and industrial properties, based on risk data gathered for the fire insurance companies. The maps show the number of buildings located on the property, and the type of construction. The maps also describe the various businesses located nearby, and show the locations of tanks, boilers, and other potential hazards.

No Sanborn Insurance Map coverage was identified in the Library of Congress collection maintained in online databases of the Los Angeles Public Library.

#### **Historical Use Information on the Surrounding Properties**

A review of historical aerial photographs of the surrounding property determined the following information:

<u>Date</u>	<u>Description</u>
1938	Bannister Avenue is in place adjacent to the west of the north and south Site parcels, and the San Gabriel River occupies the area to the east of the east Site parcel. Orchards occupy the properties adjacent to the north of the north Site parcel and to the south of the south Site parcel, and across Bannister Avenue to the west. Several rural residences and orchards along the east side of Bannister Avenue abut the west boundary of the east Site parcel. Vacant land extends south of the east Site parcel through to Ramona Boulevard. The vast flood plain of the

farther to the west. The general Site vicinity is agricultural and rural residential.

- 1952 Rural residences are in place adjacent to the north of the north Site parcel and to the south of the south Site parcel, and across Bannister Avenue to the west. Several rural residences along the east side of Bannister Avenue continue to abut the west boundary of the east Site parcel. The surrounding properties appear otherwise unchanged from 1938.
- 1964 A levee is in place adjacent to the east side of the Site. The adjacent and nearby properties appear otherwise unchanged from 1952.
- 1972 The Site surroundings appear unchanged from 1964.
- 1985 Additional residential structures are on most of the parcels adjacent west of the east Site parcel. The adjacent and nearby properties otherwise appear unchanged from 1972.
- 1997 The adjacent and nearby properties appear unchanged from 1985.
- 2003 The existing high school is in place adjacent to the south of the east Site parcel. The surrounding properties otherwise appear unchanged from 1997.
- 2013 The adjacent and nearby properties appear unchanged from 2003 and appear as they do today.

#### **4.5 Vapor Encroachment Screening for Target Property**

Following is a Vapor Encroachment Screening (VES) for the Target Property (TP), the Site, in accordance with ASTM Designation 2600 for Vapor Encroachment Screening on Property Involved in Real Estate Transactions. The purpose of a Tier I VES for a TP under E1527-13 Phase I ESA guidelines is to determine whether a potential Vapor Encroachment Condition (VEC) exists. VES screening includes:

- No Vapor Encroachment Condition (VEC) caused by the presence of Chemicals of Concern (COC).
- Existing/planned use of the TP: residences & vacant/residences.
- Existing/planned structure: residences & vacant/residences.
- Surrounding area: vacant land, residences, dry riverbed.
- Historical records related to prior use of TP and surrounding properties: vacant land/orchards/residences.
- Environmental setting information: Tujunga-Soboba association, which occurs on nearly level and gently sloping alluvial fans. The Tujunga soils are characterized as somewhat excessively drained and are rapidly permeable; depth to groundwater approximately 80 feet below ground surface (bgs), and the direction of the groundwater gradient is to the southwest, paralleling flow in the nearby San Gabriel River.

- Significant natural or man-made conduits that can serve as preferential paths for VEC, such as utility corridors, sewers, storm drains, Karst terrain (dissolution of a layers or layers of soluble bedrock): none identified.

Government records review: no site identified with a one-eighth mile radius that would pose a threat to the Site, including upgradient contaminated properties.

#### **4.6 Previous Environmental Investigations**

No previous environmental investigations are known to have been conducted.

## 5.0 CONCLUSIONS

The three-parcel Site has three vacant residential buildings, paved driveways and parking, and vacant land. A layout of the Site is included in Appendix A as Figure 2. The three parcels total approximately three acres. 4436 Bannister Avenue is owned by Baldwin Park Homes LLC, David Cook. The other two parcels are owned by El Monte Union High School District.

There are containers of chemicals outside building #3 (Photo 11). A shed in the northeast corner of 4436 Bannister Avenue has cans of paint and other chemicals (Photos 12 and 27). No other hazardous materials were observed onsite.

On October 27, 2014, in conjunction with the phase I site assessment site inspection, samples of damaged floor tile and insulation were collected in Building #1. The sampled floor tile materials were examined by a state-certified analytical laboratory, LA Testing, using the polarized light microscopy method. No asbestos was detected.

On October 27, 2014 in conjunction with the phase I site assessment inspection, a sample of suspect lead-based paint was collected in Building #1. The sample was analyzed by a state-certified analytical laboratory, LA Testing, by flame atomic absorption. No lead was detected.

Based on the review of state and federal agency listings, none of the adjacent properties appear on agency lists of contaminated sites.

The Site has not been identified by any regulatory agency as having known hazardous materials spills, releases or environmental-related violations.

This assessment has revealed evidence of no recognized environmental condition in connection with the Site property.

This assessment has revealed evidence of no recognized environmental condition in connection with the Site property.

## **6.0 RECOMMENDATIONS**

No further investigation is recommended. It is recommended that the containers of chemicals outside Building #1 and in the shed on the northeast corner of the 4436 Bannister Avenue parcel be properly disposed of.

## 7.0 LIMITATIONS

The conclusions and recommendations presented above are based upon the agreed upon scope of work outlined in the above report. Consultant makes no warranties or guarantees as to the accuracy or completeness of information obtained from information provided or compiled by others. It is possible that information exists beyond the scope of this investigation. Also, changes in site use may have occurred sometime in the past due to variations in rainfall, temperature, water usage, economic, agricultural or other factors. Additional information, which was not found or available to Consultant at the time of writing Report, may result in a modification of the conclusions and recommendations presented. This report is not a legal opinion.

Use or misuse of this report, or reliance upon the findings hereof by any parties other than Baldwin Park Homes LLC is at their own risk. The Consultant does not make any representation or warranty to such other parties as to the accuracy or completeness of this report or the suitability of its use by such other parties for any purpose whatever, known or unknown to the Consultant. The Consultant shall not have any liability to, or indemnify or hold harmless third parties for any losses incurred by the actual or purported use or misuse of this report.

Athamor Environmental Services does not and cannot represent that the Site does not contain any hazardous substances, contaminants, pollutants, petroleum hydrocarbons, or any other latent conditions beyond that observed by the Consultant during the course of the current Phase I Environmental Site Assessment scope of work. The scope of this evaluation did not include subsurface exploration, soil or water sampling, chemical analysis, or evaluation of geotechnical conditions/hazards. Further assessment of possible adverse environmental impacts from past onsite activities may be accomplished by a more comprehensive assessment.

## **8.0 RELIANCE**

This report may be distributed to and relied upon by Baldwin Park Homes LLC, its successors, and assigns, and Conduit to be named by Baldwin Park Homes LLC, its successors, and assigns with respect to a loan upon the project, together with any rating agency or any issuer or purchaser of any security collateralized or otherwise backed up by such a loan. The independent conclusions represent Athanor's best professional judgment based on the conditions that existed and the information and data available to us during the course of this assignment. Factual information regarding operations, conditions, and test data provided by Mr. Donald Cook or his representative has been assumed to be correct and complete.

Athanor has sought to convey the results of this effort to Baldwin Park Homes LLC in a way that is practical, useful, and in accordance with accepted scientific and/or engineering practice and protocols, including ASTM 1527-13.

## 9.0 REFERENCES

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