

WEST SAN GABRIEL VALLEY AREA PLAN

Findings of Fact and Statement of Overriding Considerations

1 Introduction

This Findings of Fact (Findings) and the Statement of Overriding Considerations summarize the findings of environmental impacts of the *West San Gabriel Valley Area Plan Program Environmental Impact Report* (WSGVAP PEIR) – County of Los Angeles Department of Regional Planning (SCH No. 2023110351) and presents the Statement of Overriding Considerations. This section presents an overview of the purpose of this document, summarizes the proposed Project, and presents the organization of this document.

Purpose of Findings and the Statement of Overriding Considerations

Section 15091 of the California Environmental Quality Act (CEQA) Guidelines (and Section 21081 of the California Public Resources Code) require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more written findings for each such impact. According to Section 15091, “No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Additionally, CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable significant environmental effects, the significant environmental effects may be considered “acceptable.” When the lead agency approves a project which will result in the occurrence of significant effects, which are identified in the Final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action

based on the Final EIR and/or other information in the record. (Public Resources Code (PRC) § 21081(b); CEQA Guidelines § 15093).

Overview of the Proposed Project

The proposed West San Gabriel Valley Area Plan (WSGVAP, Area Plan, or Project), described in Chapter 3.0 of the Draft PEIR, is a community-based plan that focuses on land use and policy issues that are specific to the unique characteristics and needs of the WSGV Planning Area. The WSGVAP is intended to respond to local planning issues, guide long-term development, foster harmonious and coordinated growth balanced with natural preservation, improve connectivity and walkability, generate a thriving business friendly region while enhancing sustainability in the built and natural environments, and ensure equitable decision-making throughout the WSGV Planning Area. The Project would update and consolidate the existing Altadena Community Plan into the WSGVAP. The East Pasadena-East San Gabriel, La Crescenta-Montrose, Altadena, Chapman Woods, and South San Gabriel Community Standards Districts (CSDs) are located within the WSGV Planning Area. The East Pasadena-East San Gabriel, La Crescenta-Montrose, Altadena, and South San Gabriel CSDs are being updated to bring them into conformance with the Area Plan's goals and policies related to conserving natural resources and directing development away from hazard areas. These four CSDs are being consolidated into the Planning Area Standards District (PASD) of the Area Plan. While the Chapman Woods CSD is located within the WSGV Planning Area, this CSD is not being updated since it was recently adopted by the County in November 2023.

Project Objectives

The overarching vision of the WSGVAP is to provide for the diverse needs of the WSGV communities, to incentivize neighborhood-serving small business commercial centers integrated with mixed-use development, to conserve natural resources and direct development away from hazard areas, to focus growth primarily along commercial corridors and major roadways, to preserve existing industrial uses, and to incorporate urban greening in commercial corridors to provide for the varied interests and needs of the residents, workers, and visitors of the WSGV Planning Area.

The primary objectives of the WSGVAP are to:

1. Foster harmonious and coordinated growth balanced with the preservation of natural areas and resources within the WSGV Planning Area. Implement growth that locates resident-serving uses in proximity to residential with enhanced urban greening and historic preservation;
2. Improve connectivity and walkability within the communities of the WSGV Planning Area to create pedestrian-friendly, accessible neighborhoods with complete streets. Promote landscaping and other greening measures, lighting, wayfinding signage, and open spaces along the streets to create community-centric "healthy streets";
3. Strengthen community identity and culture through inclusion of multi-functional spaces and facilities that foster play, social cohesion, cultural inclusivity, exploration, dining, recreation, and entertainment throughout the WSGV Planning Area;
4. Improve the jobs-housing balance within the WSGV Planning Area through increasing access to workforce training, partnerships with targeted employers, and skills development resources in order to connect community members to local well-paying and high-quality career opportunities.

5. Promote economic development in the WSGV Planning Area by attracting a wide range of businesses, including small businesses and non-profits, to create neighborhood-serving commercial centers/corridors integrated with mixed-use development with diverse options for housing, shopping, entertainment, recreation, and amenities;
6. Preserve areas within or adjacent to natural resources or hazard areas and in the wildland-urban interface by decreasing land use densities and development intensities;
7. Create strong community identity through public art, street beautification, and activities and programming centered around the community centers; and
8. Develop goals, policies, and implementation programs that support smart growth, sustainable development, and equitable enhancement of residential neighborhoods while preserving the historical resources of the WSGV Planning Area.

Document Organization

This Findings of Fact and the Statement of Overriding Considerations are organized as follows:

- **Section 1. Introduction:** provides background information of the purpose of Findings of Fact and the Statement of Overriding Considerations and presents the organization of this document and provides a brief overview of the proposed Project.
- **Section 2. Statement of Environmental Effects and Required Findings:** identifies the issue areas for which the proposed Project would have no impact or a less than significant impact, and presents a summary of the significant effects of the proposed Project along with the one or more written findings made by the County, as the Lead Agency, explaining how it dealt with each of the significant effects and mitigation measures.
- **Section 3. Evaluation of Alternatives:** describes the alternatives evaluated in the PEIR, and the findings and rationale for selection of the proposed Project and rejection of the alternatives, including the Environmentally Superior Alternative.
- **Section 4. Findings Regarding the Final EIR:** outlines the contents and findings of the Final PEIR
- **Section 5. Statement of Overriding Considerations:** explains in detail why the social, economic, legal, technical, or other beneficial aspects of the proposed Project outweigh the unavoidable, adverse environmental impacts and why the County, as the Lead Agency, is willing to accept such impacts.

2 Statement of Environmental Effects and Required Findings

The following sections (Sections A, B, C and D) set forth the County's findings regarding significant environmental impacts and the mitigation measures proposed to address the significant impacts. Although State CEQA Guidelines Section 15091 and PRC Section 21081 only require findings to address significant environmental effects, findings often address impacts that were found to be less than significant; therefore, these findings will account for all effects identified in the Final PEIR.

The Final PEIR addresses the direct, indirect, and cumulative environmental effects of construction and operation activities associated with the proposed Project. The Final PEIR provides the environmental information necessary for the County to make a final decision on the requested discretionary actions for all phases of this Project.

These findings provide the written analysis and conclusions of the County regarding the environmental impacts of the proposed Project, the mitigation measures included as part of the Final PEIR and adopted by the County as part of the Project, and the alternatives that have been rejected as infeasible. These findings refer to the analysis contained within the Final EIR to avoid duplication and redundancy. Because the County agrees with, and hereby adopts, the conclusions in the Final PEIR, which includes the analysis provided in the Draft EIR, these findings will not repeat the analysis and conclusions in the Final PEIR, but instead incorporates them by reference in these findings and relies upon them as substantial evidence supporting these findings.

A. Findings of Less than Significant prior to Mitigation

The County finds that the following environmental effects were identified in the Draft PEIR, the Final PEIR and the record of proceedings in this matter contain substantial evidence establishing that the Project would result in less than significant effects on the environment with respect to the areas listed below:

1. Agriculture and Forestry Resources
2. Energy
3. Geology and Soils
4. Greenhouse Gas Emissions
5. Hazards and Hazardous Materials
6. Hydrology and Water Quality
7. Land Use and Planning
8. Mineral Resources
9. Population and Housing
10. Public Services
11. Recreation
12. Utilities and Service Systems
13. Wildfire

A.1 Agriculture and Forestry Resources

Facts/Effects:

- i. The Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use (Impact 4.2-1).
- ii. The Project would not conflict with the existing zoning for, or cause rezoning of, forest land, timberland or timberland zoned Timberland Production (Impact 4.2-2).
- iii. The Project would not result in the loss of forest land or conversion of forest land to non-forest use (Impact 4.2-3).
- iv. The Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use (Impact 4.2-4).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to agriculture and forestry resources.

A.2 Energy

Facts/Effects:

- i. The Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation (Impact 4.6-1).
- ii. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency (Impact 4.6-2).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to energy.

A.3 Geology and Soils

Facts/Effects:

- i. The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides (Impact 4.7-1).
- ii. The Project would not result in substantial soil erosion or the loss of topsoil (Impact 4.7-2).
- iii. The Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project that would result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse (Impact 4.7-3).
- iv. The Project would not be located on expansive soil, creating substantial direct or indirect risks to life or property (Impact 4.7-4).
- v. The Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater (Impact 4.7-5).
- vi. The Project would not conflict with the Hillside Management Area Ordinance (Impact 4.7-6).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to geology and soils.

A.4 Greenhouse Gas Emissions

Facts/Effects:

- i. The Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment (Impact 4.8-1).
- ii. The Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs (Impact 4.8-2).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to greenhouse gas emissions.

A.5 Hazards and Hazardous Materials

Facts/Effects:

- i. The Project would not create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials (Impact 4.9-1).
- ii. The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment (Impact 4.9-2).
- iii. The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses (Impact 4.9-3).
- iv. The Project would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment (Impact 4.9-4).
- v. The Project would not result in a safety hazard or excessive noise for people residing or working in the Project area, specifically 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 (Impact 4.9-5).
- i. The Project would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan (Impact 4.9-6).
- ii. The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires (Impact 4.9-7).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to hazards and hazardous materials.

A.6 Hydrology and Water Quality

Facts/Effects:

- i. The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality (Impact 4.10-1).

- ii. The Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (Impact 4.10-2).
- iii. The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces (Impact 4.10-3).
- iv. The Project would not otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements (Impact 4.10-4).
- v. The Project would not conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84) (Impact 4.10-5).
- vi. The Project would not use onsite wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course) (Impact 4.10-6).
- vii. The Project would not be located in flood hazard, tsunami, or seiche zones and risk release of pollutants due to project inundation (Impact 4.10-7).
- viii. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (Impact 4.10-8).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to hydrology and water quality.

A.7 Land Use and Planning

Facts/Effects:

- i. The Project would not, either directly or as a result of future projects facilitated by the WSGVAP, physically divide an established community (Impact 4.11-1).
- ii. The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (Impact 4.11-2).
- iii. The Project would not conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas (Impact 4.11-3).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to land use and planning.

A.8 Mineral Resources

Facts/Effects:

- i. The Project would not result in loss of availability of a known mineral resources that would be of value to the region and the residents of the state, or result in a loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan (Impact 4.12-1 and Impact 4.12-2).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to mineral resources.

A.9 Population and Housing

Facts/Effects:

- i. The Project would not induce substantial unplanned population growth in an area, directly nor indirectly (Impact 4.14-1).
- ii. The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere (Impact 4.14-2).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to population and housing.

A.10 Public Services

Facts/Effects:

- i. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: (i) fire protection, (ii) police protection, (iii) schools, (iv) parks, (v) other public facilities (Impact 4.15-1).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to public services.

A.11 Recreation

Facts/Effects:

- i. The Project would not 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 (Impact 4.16-1).
- ii. The Project would not result in the construction or expansion of recreational facilities which might have an adverse effect on the environment (Impact 4.16-2).
- iii. The Project would not interfere with regional trail connectivity (Impact 4.16-3).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to recreation.

A.12 Utilities and Service Systems

Facts/Effects:

- i. The Project would not create new demand related to water, wastewater, stormwater drainage, electric power, natural gas power, or telecommunications utilities (Impact 4.19-1).
- ii. The Project would not induce growth beyond regional SCAG projections. As a result, sufficient water supplies would be available to serve reasonably foreseeable future development during normal, dry and multiple dry years consistent with local UWMP projections (Impact 4.19-2).
- iii. The Project would ensure adequate treatment capacity is available in the WSGV Planning Area to service future development (Impact 4.19-3).
- iv. The Project would not generate substantial solid waste or impair attainment of solid waste reduction goals (Impact 4.19-4).
- v. The Project would not increase regional capacity requirements for local solid waste facilities compared to existing capacity projections. (Impact 4.19-5).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to utilities and service systems.

A.13 Wildfire

Facts/Effects:

- i. The Project would not substantially impair an adopted emergency response plan or emergency evacuation plan (Impact 4.20-1).
- ii. The Project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors (Impact 4.20-2).

- iii. The Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment (Impact 4.20-3).
- iv. The Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes (Impact 4.20-4).

Mitigation: No mitigation measures are required to reduce impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant effects on the environment with respect to wildfire.

B. Findings of Less than Significant with Mitigation

The County finds that although the following environmental effects were identified as potentially significant in the Draft PEIR, changes or alterations have been required in, or incorporated into, the Project which avoid or lessen the potential significant environmental effects listed below to a less-than-significant level:

- 1. Tribal Cultural Resources

B.1 Tribal Cultural Resources

Facts/Effects:

- i. Future projects developed under the WSGVAP could involve ground disturbing activities (for construction of residential, commercial and mixed-use development) that could, depending on their location, result in direct or indirect substantial adverse changes to the significance of tribal cultural resources. Future projects developed under the WSGVAP would be required to comply with applicable federal, state, and local regulations and, as appropriate, to undergo the County's discretionary review process, including completion of subsequent project-level planning and environmental review under CEQA. These projects would similarly require compliance with AB 52 and SB 18 (as applicable) to ensure that tribal cultural resources are properly identified. Such projects could nonetheless result in significant impacts to sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe qualifying as tribal cultural resources (Impact 4.18-1).

Mitigation: Implementation of Mitigation Measure 4.18-1 would reduce impacts to tribal cultural resources to less than significant levels.

Mitigation Measure 4.18-1: Tribal Cultural Resources. During subsequent project-level environmental review, the County shall obtain a NAHC SLF Search, as appropriate, and comply with all applicable requirements of AB 52. Pursuant to AB 52, the County shall provide formal notification of the project to designated contact of each traditionally and culturally affiliated California Native American tribe that has requested notice. The County shall begin the consultation process within 30 days after receiving a tribe's request for consultation. The County shall consider all relevant information available for the property to identify potential tribal cultural resources in the project area, evaluate the project's potential impacts to tribal cultural resources, and mitigate those potential impacts.

If project impacts to tribal cultural resources are determined to be potentially significant, the County shall require the project to incorporate appropriate measures to avoid or minimize impacts to tribal cultural resources, including but not limited to, the measures recommended in Public Resources

Code Section 21084.3, tribal monitoring, or other alternative measures identified in consultation with the California Native American tribe. If an archaeological resource that is Native American in origin is identified in the preparation of a Phase I Archaeological Report as required by Mitigation Measure 4.5-2 (refer to Section 4.5, *Cultural Resources*) or Native American archaeological resources are encountered during construction, the County shall consult and coordinate with the California Native American Tribal representatives who are traditionally or culturally affiliated with the geographic area of the development project to evaluate and mitigate impacts in accordance with the requirements set forth in Mitigation Measure 4.5-2.

Finding: The County finds that changes or alterations have been required in, or incorporated into, the Project that lessen significant impacts to tribal cultural resources, as identified in the Final PEIR. The County finds that based on the Final PEIR and the record of proceedings, with the implementation of a mitigation measure, impacts to tribal cultural resources would be reduced to a less-than-significant level.

C. Impacts Found to Be Significant after Mitigation (Significant and Unavoidable)

The County finds that the following environmental effects were identified as potentially significant and that even with the implementation of mitigation measures, the PEIR and the record of proceedings in this matter identify or contain substantial evidence identifying significant and unavoidable environmental effects as listed below:

1. Aesthetics
2. Air Quality
3. Biological Resources
4. Cultural Resources
5. Noise
6. Transportation

C.1 Aesthetics

Facts/Effects:

- i. The Project would result in a significant and unavoidable impact with respect to having a substantial adverse effect on scenic vistas and visual resources (Impact 4.1-1).
- ii. The Project would not have an adverse impact to existing views of the WSGVAP area from elevated vantage points, as are available from regional riding, hiking, and multi-use trails (Impact 4.1-2).
- iii. The Project would not substantially damage scenic resources within a state scenic highway (Impact 4.1-3).
- iv. The Project would result in a significant and unavoidable impact with respect to substantially degrading the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality (Impact 4.1-4).
- v. The Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views. The impact would be less than significant (Impact 4.1-5).

Mitigation Measures: No feasible mitigation measures are available to reduce the impact of Impact 4.1-1 and Impact 4.1-4.

Finding: The County has determined that there are no feasible mitigation measures to reduce impacts related to adverse effects on scenic vistas and degradation of the existing visual character or quality of public views of the site and its surroundings with implementation of the Project. Based on the Final PEIR and the record of proceedings, the Project would result in significant and unavoidable impacts related to aesthetics.

C.2 Air Quality

Facts/Effects:

- i. The Project would not conflict with or obstruct implementation of the applicable air quality plan (Impact 4.3-1).
- ii. The Project would result in a significant and unavoidable impact with respect to a cumulatively considerable net increase of a criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard (Impact 4.3-2).
- iii. The Project would result in a significant and unavoidable impact with respect to the exposure of sensitive receptors to substantial pollutant concentrations during construction and operations due to future development projects facilitated by adoption of the WSGVAP generating substantial emissions in proximity to sensitive receptors (Impact 4.3-3).
- iv. The Project would result in a significant and unavoidable impact with respect to other emissions (such as those leading to odors) during construction or operation (Impact 4.3-4).

Mitigation: No feasible mitigation measures are available to reduce the impact of Impact 4.3-2, Impact 4.3-3 and Impact 4.3-4.

Finding: The County has determined that there are no feasible mitigation measures to reduce impacts related to net increases of criteria pollutants, exposure of sensitive receptors to substantial pollutant concentrations and other emissions (such as those leading to odors) during construction or operation. Based on the Final PEIR and the record of proceedings, the Project would result in significant and unavoidable impacts related to air quality.

C.3 Biological Resources

Facts/Effects:

- i. The Project would have a significant and unavoidable impact relating to the loss of special-status species through direct mortality or via indirect effects such as habitat loss and edge effects at the urban-wildland interface. Buildout of the WSGVAP could have significant adverse impacts on special-status species and/or their habitats (Impact 4.4-1).
- ii. The Project would have significant and unavoidable impacts relating to sensitive natural communities (Impact 4.4-2).
- iii. The Project could result in impacts to aquatic habitats, particularly those located in proximity to water bodies. Implementation of Mitigation Measure 4.4-1 would require identification of state and federally protected wetlands and waters, implementation of avoidance and minimization measures, obtaining necessary permits, and compensatory mitigation for projects that would result in the direct removal,

filling, or other alteration of protected aquatic resources. Impacts would be less than significant with mitigation (Impact 4.4-3).

- iv. The Project would have no impact on oak woodlands or other unique native woodlands (Impact 4.4-4).
- v. Future construction associated with the Project could result in impacts to nesting resident and migratory birds. Potential impacts could include disruption of nesting activity due to construction-related noise and direct removal of active nests associated with construction or vegetation removal/disturbance. Implementation of Mitigation Measure 4.4-2 would avoid and/or minimize impacts to nesting avian species and active nests. Potential impacts would be less than significant with mitigation (Impact 4.4-5).
- vi. The Project would not conflict with local policies or ordinances protecting biological resources (Impact 4.4-6).
- vii. The Project would not conflict with adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved state, regional, or local habitat conservation plans in effect in the West San Gabriel Valley (Impact 4.4-7).

Mitigation: No feasible mitigation measures are available to reduce the impact of Impact 4.4-1 and Impact 4.4-2. The following mitigation measures are required to reduce Impact 4.4-3 and Impact 4.4-5 below a level of significance:

Mitigation Measure 4.4-1: Aquatic Resources. Projects subject to the jurisdiction of the USACE, Los Angeles RWQCB, and/or CDFW shall provide an aquatic resources delineation of wetlands and water courses prior to disturbance of any aquatic, wetland, or riparian habitat. Findings shall be included in an aquatic resources delineation report suitable for submittal to these agencies for obtaining a Section 404 Clean Water Act permit (CWA), Section 401 Water Quality Certification (WQC), Waste Discharge Requirements (WDR), and/or streambed alteration agreement (SAA).

Based on the findings of the aquatic resources delineation report and agency verification of the extent of state/federally protected wetlands and waters resources, riparian vegetation, wetlands, and waters shall be avoided to the extent feasible, and appropriate 100-foot setbacks shall be marked from the edge of jurisdictional waters or riparian vegetation (whichever is wider) to maintain riparian and aquatic functions and values wherever feasible. In areas where avoidance of stream channels or riparian vegetation is infeasible, impacts shall be minimized and the site slopes and hydrology of remediated areas shall be restored to pre-construction conditions to the extent possible. If impacts to wetlands are unavoidable, compensatory mitigation shall ensure no net loss of wetlands.

A compensatory mitigation plan addressing temporary and permanent impacts to jurisdictional wetlands and waters shall be prepared prior to disturbance. The plan shall be developed in consultation with the USACE, Los Angeles RWQCB, and/or CDFW. All restored/established/enhanced habitats shall be protected in perpetuity, subject to regular maintenance activities, if necessary, and appropriate to permitting agencies. Alternatively, compensatory mitigation can be achieved through purchasing credits at a USACE- or CDFW-approved mitigation bank.

Mitigation Measure 4.4-2: Nesting Birds. Construction, ground-disturbing activities, and vegetation removal shall avoid the general avian nesting season of February 15 through September 15. If construction of future projects that contain or are immediately adjacent to suitable nesting habitat must occur during the general avian nesting season, a pre-construction clearance survey shall be conducted within 7 days prior to the start of construction activities to determine if any active nests or nesting activity is occurring on or within 500 feet of the project. If no sign of nesting activity is

observed, construction may proceed without potential impacts to nesting birds. If an active nest is observed during the pre-construction clearance survey, an adequate buffer shall be established around the active nest depending on sensitivity of the species and proximity to project impact areas. Typical buffer distances include up to 300-feet for passerines and up to 500-feet for raptors but can be reduced as deemed appropriate by a monitoring biologist. On site construction monitoring may also be required to ensure that no direct or indirect impacts occur to the active nest. Project activities may encroach into the buffer only at the discretion of the monitoring biologist. The buffer shall remain in place until the nest is no longer active as determined by the monitoring biologist.

Finding: The County has determined that there are no feasible mitigation measures to reduce impacts related to candidate, sensitive, or special status species, or their habitats, including those in Significant Ecological Areas (SEAs), and sensitive natural communities with implementation of the Project. Based on the Final PEIR and the record of proceedings, the Project would result in significant and unavoidable impacts related to biological resources.

C.4 Cultural Resources

Facts/Effects:

- i. The Project would have a significant and unavoidable impact to historic architectural and/or archaeological resources qualifying as historical resources under CEQA due to structural improvements, demolition/alteration of existing structures, and/or ground disturbing activities (for construction of residential, commercial and mixed-use development) that could, depending on their location, result in direct or indirect adverse changes to the significance of historical resources. Despite implementation of Mitigation Measure 4.5-1, this impact would remain significant and unavoidable (Impact 4.5-1).
- ii. Future projects facilitating land use/zoning changes and policies included in the WSGVAP could involve ground disturbing activities (for construction of residential, commercial and mixed-use development) that could, depending on their location, result in direct or indirect adverse changes to the significance of historical resources. Future projects would be required to comply with existing federal, State, and local regulations that protect unique archaeological resources and undergo the County's discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA. Any project that involves ground disturbing activities could result in a significant impact to a unique archaeological resource (Impact 4.5-2).
- iii. Future projects facilitating land use/zoning changes and policies included in the WSGVAP could involve ground disturbing activities (for construction of residential, commercial and mixed-use development) that could, depending on their location, result in direct or indirect adverse changes to the significance of paleontological resources. Future projects would be required to comply with existing federal, State, and local regulations that protect paleontological resources and undergo the County's discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA. Such projects could nonetheless result in significant impacts to unique paleontological resources or sites under CEQA (Impact 4.5-3).
- iv. Future projects facilitating land use/zoning changes and policies included in the WSGVAP could involve ground disturbing activities (for construction of residential, commercial and mixed-use development) that could, depending on their location, disturb human remains. Future projects would be required to comply with existing federal, State, and local regulations that protect human remains and undergo the County's discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA. Such projects could nonetheless result in significant impacts to human remains under CEQA, including to human remains interred outside of dedicated cemeteries (Impact 4.5-4).

Mitigation: No feasible mitigation measures are available to reduce the impact of Impact 4.5-1. The following mitigation measures are required to reduce Impact 4.5-2, Impact 4.5-3, and Impact 4.5-4 below a level of significance:

Mitigation Measure 4.5-1 Historic Built Resources. Prior to development of any future discretionary project within areas that contain properties more than 45 years old, the project proponent shall retain a qualified architectural historian, defined as meeting the Secretary of the Interior's Professional Qualification Standards for architectural history, to conduct a historic resources assessment including: a records search at the South Central Coastal Information Center; a review of pertinent archives, databases, and sources; a pedestrian field survey; recordation of all identified historic resources on California Department of Parks and Recreation 523 forms; and preparation of a technical report documenting the methods and results of the assessment. All identified historic resources will be assessed for the project's potential to result in direct and/or indirect effects on those resources and any historic resource that may be affected shall be evaluated for its potential significance under National and State criteria prior to Los Angeles County's approval of project plans and publication of subsequent CEQA documents. The qualified architectural historian shall provide recommendations regarding additional work, treatment, or mitigation for affected historical resources to be implemented prior to their demolition or alteration. Impacts on historical resources shall be analyzed using CEQA thresholds to determine if a project would result in a substantial adverse change in the significance of a historical resource. If a potentially significant impact would occur, Los Angeles County shall require appropriate mitigation to lessen the impact to the degree feasible.

Mitigation Measure 4.5-2: Archaeological Resources Assessment. Prior to conducting construction activities for future discretionary projects that would involve ground disturbance, the project proponent shall retain an archaeologist meeting the minimum PQS set forth by the Secretary of the Interior (codified in 36 CFR Part 61; 48 Federal Register 44738–44739) (Qualified Archaeologist) to conduct an archaeological resources assessment. The assessment shall include a records search at the South Central Coastal Information Center or review of a prior record search conducted within the previous one year; a Sacred Lands File search at the California Native American Heritage Commission (NAHC); geoarchaeological review including a focused assessment of land use history and any available geotechnical data to assess the potential for subsurface archaeological resources; a pedestrian field survey in instances where ground surface is exposed; recordation of all identified archaeological resources on DPR 523 forms; evaluation of resources affected by the project for eligibility for listing in the California Register (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a]), and for local listing; and preparation of a technical report documenting the methods and results of the assessment.

Resources that do not qualify as historical resources shall be considered by the Qualified Archaeologist for qualification as unique archaeological resources as defined in Public Resources Code Section 21083.2(g). The technical report also shall provide recommendations as to whether additional studies are warranted to further identify or evaluate archaeological resources (i.e., Extended Phase I boundary delineation, Phase II testing and evaluation) and if archaeological monitoring and Native American monitoring of ground disturbing activities is warranted (e.g., in areas where there is a higher potential to encounter buried resources). Prior to the initiation of field work for any Extended Phase I or Phase II investigation, the Qualified Archaeologist shall prepare a work plan outlining the investigation's objectives, goals, and methodology. If archaeological monitoring is warranted, the Qualified Archaeologist shall determine the locations and duration of monitoring and reporting requirements. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but

not limited to archaeological resources assessments, Extended Phase I and Phase II reports, and monitoring reports).

Mitigation Measure 4.5-3: Construction Worker Cultural Resources Sensitivity Training. For future discretionary projects with ground disturbing activities that may encounter potentially significant archaeological resources, the Qualified Archaeologist shall implement a cultural resources sensitivity training program. The Qualified Archaeologist, or its designee, shall instruct all construction personnel of the types of archaeological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains, applicable laws protecting archaeological resources, and confidentiality of discoveries. In the event that construction crews are phased, additional trainings shall be conducted for new construction personnel. The project proponent or its contractors shall ensure construction personnel are made available for and attend the training. The project proponent shall retain documentation demonstrating attendance and provide it to the County.

Mitigation Measure 4.5-4: Archaeological Resources Discoveries. In the event archaeological resources are encountered during construction of a project, the project proponent shall cease all activity within 50 feet of the find shall cease. The discovery shall be evaluated for significance by the Qualified Archaeologist. If the Qualified Archaeologist determines that the resource is significant (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a] or for unique archaeological resource in Public Resources Code Section 21083.2[g]), the Qualified Archaeologist shall provide a method for avoidance and preservation in place, which shall be the preferred manner of mitigating impacts. If avoidance is infeasible, the Qualified Archaeologist shall develop a Phase III Archaeological Resources Data Recovery and Treatment Plan consistent with Mitigation Measure 4.5-5. The Qualified Archaeologist also shall determine, based on the initial assessment of the discovery, whether the 50-foot buffer may be reduced. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to Extended Phase I, Phase II, and Phase III reports).

Mitigation Measure 4.5-5: Treatment of Archaeological Resources. If the assessment conducted under Mitigation Measure 4.5-2 or Mitigation Measure 4.5-4 identifies significant archaeological resources (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a] or for unique archaeological resource in Public Resources Code Section 21083.2[g]), then avoidance and preservation in place shall be the preferred manner of mitigating impacts. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. If avoidance and preservation in place of significant archaeological resources is determined by the County to be infeasible, then the Qualified Archaeologist shall prepare a Phase III Archaeological Resources Data Recovery and Treatment Plan. The plan shall include: a detailed research design; justification for data recovery or other treatment methods depending on the nature of the resource's eligibility; excavation methodology; and, reporting and curation requirements. All Phase III reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center.

Mitigation Measure 4.5-6: Curation and Disposition of Cultural Materials. Disposition of Native American archaeological materials shall be determined by the County in coordination with local California Native American tribes. Disposition of materials may include curation at an accredited or nonaccredited repository, onsite or offsite reburial, and/or donation to a local tribe or public, nonprofit institution with a research interest in the materials, or local school or historical society in the area for educational purposes. The County shall consider tribal preferences when making a determination of disposition of Native American archaeological materials. Disposition of

Native American human remains and associated funerary objects or grave goods (i.e. artifacts associated with human remains) shall be determined by the landowner in consultation with the County and the MLD. The project proponent shall curate all significant historic-period archaeological material, or portions thereof at the discretion of the Qualified Archaeologist, at a repository accredited by the American Association of Museums that meets the standards outlined in 36 CFR Section 79.9. If no accredited repository accepts the collection, then the project proponent may curate it at a nonaccredited repository as long as it meets the minimum standards set forth in 36 CFR Section 79.9. If neither an accredited nor a nonaccredited repository accepts the collection, then the project proponent may offer the collection to a public, nonprofit institution with a research interest in the materials, or to a local school or historical society in the area for educational purposes.

Mitigation Measure 4.5-7: Paleontological Resources Assessment and Monitoring. For future discretionary projects developed under the WSGVAP within the communities of South Monrovia Islands and South San Gabriel that involve ground disturbance, the project proponent shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP) definition for qualified professional paleontologist (Qualified Paleontologist) to prepare a paleontological resources assessment report prior to the start of construction activities.

The report shall include methods and results of the paleontological resources assessment, monitoring requirements (including depths, frequency, and reporting), and maps that outline where monitoring is required. Monitoring shall follow SVP Guidelines: no monitoring of ground-disturbing activities within units of Low Sensitivity or No Potential; monitoring of all ground-disturbing activities (with depths specified) in units of Low to High Significance; and at all depths within units of High Significance unless the Qualified Paleontologist's report identifies previous disturbances or the use of construction methods which do not warrant monitoring; and monitoring at the initiation of excavation in units of Undetermined Significance. The report also shall stipulate whether screen washing is necessary to recover small specimens following SVP Guidelines and determine whether unique geologic features are present onsite. If monitoring is conducted, then the Qualified Paleontologist shall prepare a final report summarizing monitoring results and submit it to the project proponent and the County.

Mitigation Measure 4.5-8: Paleontological Resources Sensitivity Training. Prior to the start of ground disturbing activities for future discretionary projects developed under the WSGVAP within the communities of South Monrovia Islands and South San Gabriel, the Qualified Paleontologist or its designee shall conduct construction worker paleontological resources sensitivity training (or may be provided via digital recording) for all construction workers. Construction workers shall be informed on how to identify the types of paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The project proponent shall ensure that construction workers are made available for and attend the training. The project proponent shall retain documentation demonstrating attendance and provide it to the County.

Mitigation Measure 4.5-9: Paleontological Discoveries. If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area determined by the paleontological monitor shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading/excavation contractor shall assist, where feasible, in removing rock/sediment samples for

initial processing and evaluation. If a fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP. Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, nonprofit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. Accompanying notes, maps, and photographs shall also be filed at the repository. If no institution accepts the fossil collection, it may be donated to a local school or other interested organization in the area for educational purposes.

If construction workers discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure. Any salvage reports resulting from implementation of this measure shall be filed with the Natural History Museum of Los Angeles County.

Mitigation Measure 4.5-10: Human Remains Discoveries. If human remains are encountered, then the project proponent or its contractor shall immediately halt work within 50 feet of the discovery and contact the Los Angeles County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5, which require that no further disturbance shall occur until the County Coroner has made the necessary findings as to the remains' origin and disposition. If the County Coroner determines that the remains are Native American, then the County Coroner will notify the NAHC within 24 hours in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code Section 5097.98. The NAHC shall then identify the person(s) thought to be the MLD. The MLD may, with the permission of the land owner, or their authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the landowner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. The project proponent, County, and landowner shall discuss and confer with the MLD on all reasonable options regarding the MLD's preferences for treatment.

Until the project proponent, County, and landowner have conferred with the MLD, the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity and is adequately protected according to generally accepted cultural or archaeological standards or practices (e.g., the NAHC's *A Professional Guide for the Preservation and Protection of Native American Human Remains and Associated Grave Goods* [NAHC 2022], which reiterates statutory requirements), and that further activities take into account the possibility of multiple burials.

If the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Public Resources Code Section 5097.94(k), if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

Finding: The County has determined that it is impossible to know if future development implemented under the Project would avoid substantial adverse impacts on historical resources without project-specific information at this time. Therefore, even with implementation of Mitigation Measure 4.5-1, impacts would be significant and unavoidable. Based on the Final PEIR and the record of proceedings, the Project would result in significant and unavoidable impacts related to historic resources.

C.5 Noise

Facts/Effects:

- i. The Project would have a significant and unavoidable impact relating to construction noise levels in excess of standards. Despite implementation of Mitigation Measures 4.13-1 and 4.13-2, this impact would remain significant and unavoidable (Impact 4.13-1).
- ii. Construction activities for future projects facilitated by adoption of the WSGVAP could result in significant construction groundborne vibration and groundborne noise levels in excess of standards and result in a significant and unavoidable impact. Despite implementation of Mitigation Measure 4.13-3, this impact would remain significant and unavoidable during construction (Impact 4.13-2).
- iii. Implementation of the proposed WSGVAP would not expose people residing or working in the project area to excessive noise levels, and thus this impact would be less than significant and no mitigation is required (Impact NOI-3).

Mitigation: No feasible mitigation measures are available to reduce the impact of Impact 4.13-1 and Impact 4.13-2 to a less than significant level. The following mitigation measures are required to reduce the severity of Impact 4.13-1 and Impact 4.13-2, but they would remain significant and unavoidable:

Mitigation Measure 4.13-1: Commercial/Industrial/Accessory Commercial Unit (ACU) Operational Noise. Prior to issuance of a building permit for any future commercial, industrial, mixed-use, or ACU development projects within the WSGV Planning Area that are located within 500 feet of sensitive receptors, project applicant shall submit a noise mitigation plan to Department of Public Health (DPH) for review and approval. The noise mitigation plan shall be prepared by a sound engineer and be sufficient for DPH to make a determination of whether the project will be in compliance with all applicable County Noise standards and regulations. At minimum, the noise mitigation plan shall include the following information: a list of all electro-mechanical equipment (HVAC, refrigeration systems, generators, etc.) that will be installed at the project site; sound level that would be produced by each equipment; noise-reduction measures, as necessary; and sufficient predictive analysis of project operational noise impact. All noise-reduction measures approved by DPH shall be incorporated into the project building plans and be implemented during project construction. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:

- Install permanent noise-occluding shrouds or screens on operating equipment.
- Maintain all equipment and noise control features in accordance with the manufacturer's specifications.
- Orient equipment vents and other sources of sound emissions away from noise-sensitive receptors and/or behind structures, containers, or natural features.
- Increase distance between the operating equipment and the noise-sensitive receptor(s) of concern, to the maximum extent feasible.

- Install portable sound-occluding barriers to attenuate noise between the source(s) and the noise-sensitive receptor(s).

This mitigation measure shall not apply and is superseded once a Countywide noise ordinance goes into effect that establishes operational noise standards for commercial, industrial, mixed-use, or ACU development projects within the WSGV Planning Area.

Mitigation Measure 4.13-2: Construction Noise. Applicants for future development projects pursuant to implementation of the WSGVAP that are within 500 feet of sensitive receptors (e.g., residences, hospitals, schools) shall submit a noise study to DPH for review and approval prior to issuance of a grading or building permit. The study shall include noise-reduction measures, if necessary, to ensure project construction noise will be in compliance with the County of Los Angeles Noise Ordinance standards (i.e., LACC 12.08.440). All noise-reduction measures approved by DPH shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during construction activities. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:

- Install temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive receptors.
- Equip construction equipment with effective mufflers, sound-insulating hoods or enclosures, vibration dampers, and other Best Available Control Technology (BACT).
- Limit non-essential idling of construction equipment to no more than five minutes per hour.

This mitigation measure shall not apply and is superseded once a Countywide noise ordinance goes into effect that establishes construction noise standards for noise-reduction measures that ensures project construction noise compliance with the County of Los Angeles Noise Ordinance standards (i.e., LACC 12.08.440) for development projects within the WSGV Planning Area.

Mitigation Measure 4.13-3: Construction Vibration. For future development projects that utilize vibration-intensive construction equipment (e.g., pile drivers, jack hammers, and vibratory rollers) within 300 feet of sensitive receptors within the WSGV Planning Area, project applicant shall submit a vibration impact evaluation to DPH for review and approval prior to issuance of a grading or building permit. The evaluation shall include a list of project construction equipment and the associated vibration levels and a predictive analysis of potential project vibration impacts. If construction-related vibration is determined to be perceptible at vibration-sensitive uses (i.e., exceed the County's standard of 0.01 inches per second RMS or 0.04 inches per second PPV vibration velocity [within the range of 1 to 100 Hz frequency]), project-specific measures shall be required to ensure project compliance with vibration standards. All project-specific measures approved by DPH shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during project construction.

Examples of equipment vibration source-to-receptor distances at which impact evaluation should occur vary with equipment type (based on FTA reference vibration information) and are as follows:

- Jackhammer: 23 feet.
- Dozer, hoe-ram, drill rig, front-end loader, tractor, or backhoe: 43 feet.
- Roller (for site ground compaction or paving): 75 feet.
- Impact pile-driving: 280 feet.

This mitigation measure shall not apply and is superseded once a Countywide groundborne vibration ordinance goes into effect that establishes construction groundborne vibration standards for vibration-reduction measures that ensures project construction groundborne vibration compliance with the applicable County of Los Angeles standard for development projects within the WSGV Planning Area.

Finding: The County has determined that there are no feasible mitigation measures to reduce impacts to a less than significant level related to noise and vibration with implementation of the Project. Based on the Final PEIR and the record of proceedings, the Project would result in significant and unavoidable impacts related to noise and vibration.

C.6 Transportation

Facts/Effects:

- i. The Project would be consistent with all applicable plans and programs related to transportation (Impact 4.17-1).
- ii. The Project would result in a potentially significant VMT impact. Although VMT per capita would be reduced as a result of the Project, with Mitigation Measures 4.17-1 and 4.17-2, the impact related to VMT per service population will remain significant and unavoidable (Impact 4.17-2).
- iii. The Project would not result in hazards due to design features or incompatible uses (Impact 4.17-3).
- iv. The Project would facilitate the consideration of the needs for emergency access in transportation planning during buildout (Impact 4.17-4).

Mitigation: No feasible mitigation measures are available to fully reduce the impact of Impact 4.17-2. The following mitigation measures are required to reduce the severity of Impact 4.17-2, but the impact would remain significant and unavoidable:

Mitigation Measure 4.17-1: VMT Reduction Projects. The County will work with State, regional, and local agencies to reduce regional VMT. Land use policies in the WSGVAP to improve and/or expand transit service, bicycle and pedestrian facilities, and transportation projects will help the region to achieve the projected decreases in regional VMT. The County will also collaborate with State and other agencies to explore the feasibility of new programs for reducing VMT, such as VMT fees.

Mitigation Measure 4.17-2: TDM Strategies. Implementation of TDM strategies, where feasible and necessary based on project- and site-specific considerations, may include but are not limited to those identified below:

1. Commute Trip Reduction Marketing
2. Ridesharing Programs
3. Subsidized or Discounted Transit Program
4. En-of-Trip Bicycle Facilities
5. Employer-Sponsored Vanpool
6. Limit Residential Parking Supply
7. Unbundle Residential Parking Costs from Property Cost

8. Extend Transit Network Coverage or Hours
9. Increase Transit Service Frequency
10. Implement Transit-Supportive Roadway Treatments
11. Provide Bus Rapid Transit

Finding: The County has determined that there are no feasible mitigation measures to fully reduce impacts related to VMT with implementation of the Project. Based on the Final PEIR and the record of proceedings, the Project would result in significant and unavoidable impacts related to transportation.

D. Cumulative Impacts

As indicated previously, the Final PEIR addresses the direct, indirect, and cumulative environmental effects of construction and operation activities associated with the Project. The Draft PEIR provides a detailed cumulative analysis, and this section provides the Findings relative to the cumulative environmental impacts that would result from implementation of the Project.

Cumulative Impacts Found to Be Less than Significant:

1. Agriculture and Forestry Resources
2. Energy
3. Geology and Soils
4. Greenhouse Gas Emissions
5. Hazards and Hazardous Materials
6. Hydrology and Water Quality
7. Land Use and Planning
8. Mineral Resources
9. Population and Housing
10. Public Services
11. Recreation
12. Utilities and Service Systems
13. Wildfire

Cumulative Impacts Found to Be Less than Significant with Mitigation:

14. Tribal Cultural Resources

Cumulative Impacts Found to Be Significant and Unavoidable:

15. Aesthetics
16. Air Quality
17. Biological Resources
18. Cultural Resources

- 19. Noise
- 20. Transportation

D.1 Agriculture and Forestry Resources

Facts/Effects:

- i. The Project's less-than-significant incremental contribution would not be cumulatively considerable when considered together with the incremental impacts of other cumulative projects because projects developed under the WSGVAP would not be located on parcels used or designated for agricultural or forestry uses, and site-specific discretionary environmental and permitting processes would address potential significant impacts. As a result, the WSGVAP would make a less than cumulatively considerable contribution (Impact 4.2-5).
- ii. No significant cumulative condition exists with respect to conflicts with zoning for forest land. Therefore, no significant cumulative impact exists to which the WSGVAP could contribute, and no cumulative impact would occur (Impact 4.2-6).
- iii. As mentioned in Impact 4.2-6, it is unlikely that throughout the county, there is a significant cumulative condition with regard to the conversion of forest land and the Project includes measures intended to protect and conserve forestland. There is no significant cumulative condition to which the Project could contribute and no cumulative impact (Impact 4.2-7).
- iv. The WSGVAP includes policies to protect open space, agricultural lands, and forest lands to ensure that future development protects and conserves those areas. Therefore, the Project would have a less than significant cumulative impact related to changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use (Impact 4.2-8).

Mitigation: No mitigation measures are required to reduce cumulative agriculture and forestry resources impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to agriculture and forestry resources.

D.2 Energy

Facts/Effects:

- i. Development under the proposed Project would be required to incorporate energy conservation features to comply with applicable mandatory regulations including CALGreen Code and state energy standards under Title 24. Therefore, the impact with respect to electricity and natural gas consumption from new development under the Project would be less than cumulatively considerable.
- ii. Development under the proposed Project would be required to demonstrate consistency with federal and state fuel efficiency goals and incorporate mitigation measures as required under CEQA. Siting land use development projects at infill sites is consistent with the state's overall goals to reduce VMT pursuant to SB 375, and VMT per capita would decrease compared to existing conditions. Therefore, the impact of development anticipated by the Project would be less than cumulatively considerable with respect to transportation energy (Impact 4.6-3).
- iii. Development under the proposed Project would be required to comply with the RPS, California Integrated Energy Policy Plan, Title 24 Building Energy Efficiency Standards, Connect SoCal 2024,

OurCounty Los Angeles Countywide Sustainability Plan, or the County's 2045 CAP. Other cumulative projects would also have to comply with the goals and policies of these plans. Therefore, the impact on the implementation of a state or local plan for renewable energy or energy efficiency would be less than cumulatively considerable (Impact 4.6-4).

Mitigation: No mitigation measures are required to reduce cumulative energy impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to energy.

D.3 Geology and Soils

Facts/Effects:

- i. The majority of impacts from geologic hazards, such as surface fault rupture, seismically induced ground shaking, liquefaction, lateral spreading, landslides, subsidence, and expansive soils, are site-specific and are therefore generally mitigated on a project-by-project basis and do not combine with other projects resulting in a cumulative impact. All future project would need to adhere to required building engineering design, the most recent version of the CBC, and would incorporate individual mitigation or geotechnical requirements for site-specific geologic hazards present on each individual cumulative project site, as needed. Therefore, a cumulative impact related to site-specific geologic hazards would not occur and the Project's incremental contribution to impacts associated with geologic hazards would not be cumulatively considerable (Impact 4.7-7).
- ii. For cumulative projects disturbing more than one acre of ground surface, the Construction General Permit requires the preparation and implementation of a SWPPP that would include erosion control and sediment control BMPs, such as sandbags, straw wattles, and covering of soil stockpiles, which would ensure that soil erosion and loss of topsoil on the construction site would be minimized. Cumulative project sites that disturb less than one acre of ground surface would be required to implement, at a minimum, the BMPs identified in the Los Angeles County MS4 Permit, which includes erosion control and sediment control strategies for small construction sites. Therefore, the Project's incremental contribution to impacts related to soil erosion and loss of topsoil would not be cumulatively considerable (Impact 4.7-8).
- iii. Potential cumulative impacts on geology and soils would result from projects that combine to create geologic hazards. The majority of impacts from geologic hazards, including unstable soils, are site-specific and are therefore generally mitigated on a project-by-project basis and do not combine with other projects resulting in a cumulative impact. Therefore, the Project's incremental contribution to impacts related to unstable soils would not be cumulatively considerable (Impact 4.7-9).
- iv. The majority of impacts from geologic hazards, including unstable soils, are site-specific and are therefore generally mitigated on a project-by-project basis and do not combine with other projects resulting in a cumulative impact. Therefore, the Project's incremental contribution to impacts related to expansive soils would not be cumulatively considerable (Impact 4.7-10).
- v. Similar to the Project, other closely related past, present, and reasonably foreseeable probable future projects include connections to the sanitary sewer system and would not use onsite or alternative wastewater treatment systems. If a future project were to include use of alternative wastewater treatment system, those projects would be subject to the same State and County permitting requirements, which would ensure impacts are less than significant. As a result, there is no significant

cumulative impact related to septic and alternative sanitary sewer or wastewater systems and thus, the Project would not contribute to cumulative impact associated with wastewater systems (Impact 4.7-11).

- vi. As required for all developments within Hillside Management Areas (HMAs), unless exempted under the HMA Ordinance provisions, conformance with the County's HMA Ordinance and the General Plan goals and policies would ensure compliance with Hillside Design Guidelines. Since the Project and cumulative development would be required to comply with these requirements, no significant cumulative effect would occur. Cumulative impacts are considered less than significant (Impact 4.7-12).

Mitigation: No mitigation measures are required to reduce cumulative geological impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to geology and soils.

D.4 Greenhouse Gas Emissions

Facts/Effects:

- i. Currently, there are no adopted CARB, SCAQMD, or County significance thresholds or specific numeric reduction targets applicable to the WSGVAP, and no approved policy or guidance to assist in determining significance at the cumulative level. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guidelines Section 15064(h)(3), the County, as lead agency, has determined that the WSGVAP's contribution to cumulative GHG emissions and global climate change would be less than significant if the WSGVAP is consistent with the strategies, measures, and actions of applicable regulatory plans and policies to reduce GHG emissions: 2022 Scoping Plan, SCAG's Connect SoCal 2024, and the 2045 CAP. Given that the Project would not conflict with the strategies, measures, and actions of applicable GHG reduction plans, policies, and regulations, emissions associated with future development facilitated by adoption of the WSGVAP would be less than significant on a cumulative basis (Impact 4.8-3 and Impact 4.8-4)

Mitigation: No mitigation measures are required to reduce cumulative greenhouse gas emissions impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to greenhouse gas emissions.

D.5 Hazards and Hazardous Materials

Facts/Effects:

- i. Future projects developed under the WSGVAP would be required to comply with all requirements and regulations set forth by the County, USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD related to the transport, use, and disposal of hazardous materials. Cumulative projects would also be subject to the requirements and regulations set forth by the County, USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD related to the transport, use, and disposal of hazardous materials. Accordingly, cumulative development would not result in physical changes that would result in a significant environmental effect. Cumulative projects

would also be required to implement a SWPPP and comply with the CCR during construction, site grading, excavation operations, and building demolition. For these reasons, the Project in conjunction with cumulative projects would have a less than significant cumulative effect (Impact 4.9-8).

- ii. Future development associated with implementation of the WSGVAP would involve the transportation, storage, use, or disposal of a variety of hazardous materials, including batteries, hydraulic fluid, diesel fuel, gasoline, grease, lubricants, paints, solvents, and adhesives. Compliance with applicable federal, state, and local laws and regulations would ensure that impacts related to the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions would be less than significant. Therefore, the Project's contribution to cumulative impacts would be considered less than significant (Impact 4.9-9).
- iii. The potential exists for the routine transport of hazardous materials and waste to result in the release of hazardous materials from an accident near a school site or the release of contamination near a school site resulting from the development of a site that has been previously contaminated, which could result in a potentially significant cumulative impact. However, compliance with existing federal, State, and local regulations related to the transport, use, and disposal of hazardous materials mentioned above in Impacts 4.9-1 and 4.9-2 would reduce potential Project and cumulative impacts related to handling hazardous materials and waste near a school to a less than significant level. Therefore, the Project's contribution to this cumulative impact would not be cumulatively considerable (Impact 4.9-10).
- iv. Should any hazardous materials be inadvertently encountered during construction activities from cumulative development, the handling, transportation, and disposal of hazardous materials would be required to comply with the requirements and regulations set forth by the County, USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, Los Angeles County CUPA, and SCAQMD. In reviewing individual cumulative project applications, local jurisdictions in the area would determine which regulations and general plan policies apply, depending on the specific characteristics of the project type and/or project site during the development review process. Therefore, the Project's contribution to this cumulative impact would not be cumulatively considerable (Impact 4.9-11).
- v. All cumulative development would be required to comply with the all applicable FAA and ALUCP requirements and would be required to demonstrate consistency with the applicable General Plan goals and policies. Compliance with these regulations would ensure that the Project in conjunction with cumulative projects would result in less-than-significant cumulative impacts related to airport safety or noise hazards (Impact 4.9-12).
- vi. All new projects would be subject to the same federal, State, and local traffic regulations, which would ensure the cumulative impact related to emergency response or evacuation plans would be less than significant (Impact 4.9-13).
- vii. Compliance with the provisions of the CFC and the CBC as well as consistency with the goals and policies of the WSGVAP and General Plan policies would ensure that cumulative impacts related to exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires would be less than significant. For this reason, the contribution of the Project to this impact would not be cumulatively considerable. Therefore, cumulative impacts related to wildland fire hazards are considered less than significant (Impact 4.9-14).

Mitigation: No mitigation measures are required to reduce cumulative hazards and hazardous materials impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to hazards and hazardous materials.

D.6 Hydrology and Water Quality

Facts/Effects:

- i. Cumulative development would be required to adhere to regulations such as the Construction General Permit, the MS4 NPDES Permit and the County LID Standards Manual. Compliance with these regulations would require the implementation of BMPs to ensure surface and groundwater quality. Therefore, the Project's contribution to cumulative impacts would be less than cumulatively considerable with regulatory compliance (Impact 4.10-9).
- ii. The water rights of each water purveyor that has rights to groundwater from the San Gabriel Valley and Raymond basins are limited based on the adjudication that established the pumping rights for each purveyor. Compliance with the set pumping rights would eliminate the potential for the water agencies that will serve cumulative development growth to substantially impact the groundwater aquifers. Therefore, cumulative development would result in less-than-significant impacts on groundwater from the San Gabriel Valley and Raymond groundwater basins, and the Project's incremental contribution would not be cumulatively considerable (Impact 4.10-10).
- iii. Cumulative development would be required to comply with all pertinent regulations, such as the Construction General Permit, County LID Standards Manual, and the MS4 NPDES permit. Compliance with these regulations would require the implementation of BMPs to ensure stormwater runoff and flood hazards would be minimized. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable with regulatory compliance and BMP implementation (Impact 4.10-11).
- iv. The land use and zoning modifications proposed under the WSGVAP would not occur within these mapped 100- and 500-year flood zones and as such, future development under the Area Plan would not occur within a mapped flood zone. As such, the Project's contribution to impact related to flood hazards would not be cumulatively considerable (Impact 4.10-12).
- v. Cumulative development would be required to adhere to regulations such as the Construction General Permit, the MS4 NPDES Permit and the County LID Standards Manual. Compliance with these regulations would require the implementation of BMPs to ensure surface and groundwater quality. Therefore, the Project's contribution to cumulative impacts would be less than cumulatively considerable with regulatory compliance and implementation of BMPs (Impact 4.10-13).
- vi. If future projects developed under the WSGVAP proposed to use onsite wastewater treatment systems, regulatory and permitting requirements would ensure impacts would be less than significant. Therefore, the Project's contribution to cumulative impacts would be less than cumulatively considerable (Impact 4.10-14).
- vii. Any future development or facility that would require the use or storage of hazardous materials (or other pollutants) would be required to prepare and implement a HMBP, SWPPP, and a SPCC Plan. Compliance with these plans would ensure that any hazardous materials on-site are properly contained to prevent accidental release. In addition, the County General Plan and the WSGVAP discourage development in flood hazard zones, floodplains, or flood prone areas. Therefore, the Project's incremental impacts are considered in combination with the incremental impacts of past, present, and reasonably foreseeable future projects, its incremental contribution to the risk of release of pollutants due to inundation would not be cumulatively considerable (Impact 4.10-15).
- viii. No GSP has been prepared for the San Gabriel Valley or Raymond groundwater basins. Since groundwater withdrawals are limited based on the adjudication, compliance with the judgments that set pumping rights would eliminate the potential for the water agencies that serve the WSGV Planning Area to substantially impact the groundwater aquifer. Therefore, the Project's incremental contribution would not be cumulatively considerable (Impact 4.10-16).

Mitigation: No mitigation measures are required to reduce cumulative hydrology and water quality impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to hydrology and water quality.

D.7 Land Use and Planning

Facts/Effects:

- i. Impacts related to the division of an established community are generally site-specific, meaning that cumulative development projects outside of the WSGV Planning Area would be unlikely to contribute to a cumulative impact related to division of an established community through construction of roadway, structures, or other transportation facilities within the Plan Area. Similarly, buildout associated with the Project would not contribute to a cumulative impact related to division of established communities within the County (Impact 4.11-4).
- ii. Cumulative development projects, like the proposed WSGVAP, would be subject to CEQA, as appropriate, and would be required to demonstrate consistency with applicable planning documents, such as the County's General Plan, general plans prepared by nearby cities, and regional plans, such as the Connect SoCal 2024, 2045 CAP, 2023 ATSP, Our County, and Step-by-Step plans. The WSGVAP in combination with other cumulative growth in unincorporated areas of the County would contribute to a less than significant cumulative impact related to conflicts with the General Plan or other regional and use plans adopted to avoid or mitigate environmental impacts (Impact 4.11-5).
- iii. Any cumulative development projects proposed within HMAs in unincorporated areas of the County would be subject to the County's HMA Ordinance and Hillside Design Guidelines, which implement the policies of the General Plan by ensuring that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design techniques. All cumulative projects within HMAs would be subject to the same local development standards as future projects developed under the WSGVAP in HMAs, including those identified in the County Code. Cumulative impacts would be less than significant (Impact 4.11-6).

Mitigation: No mitigation measures are required to reduce cumulative land use and planning impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to land use and planning.

D.8 Mineral Resources

Facts/Effects:

- i. Future development under the WSGVAP would not preclude access to mineral resources, including aggregate or oil and gas resources, within the WSGV Planning Area. Therefore, the Project would not result in the loss of a regionally or locally important mineral resources. Furthermore, the WSGVAP does not propose growth within areas developed for mineral resource extraction. Therefore, the Project would not contribute to a cumulatively considerable impact related to the loss of availability of mineral resources (Impact 4.12-3 and Impact 4.12-4).

Mitigation: No mitigation measures are required to reduce cumulative mineral resource impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to mineral resources.

D.9 Population and Housing

Facts/Effects:

- i. Future development, including growth anticipated under the proposed Project, would not result in the displacement of substantial numbers of existing people or housing as future development would be required to comply with planning documents, such as the Los Angeles County General Plan, general plans prepared by nearby cities, and regional plans, such as the WSGVAP, SCAG's Regional Comprehensive Plan, and the SCAG RTP/SCS. The Project in combination with other cumulative growth in Los Angeles County would contribute to a less than significant cumulative-induced population increase (Impact 4.14-3 and Impact 4.14-4).

Mitigation: No mitigation measures are required to reduce cumulative population and housing impacts below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to population and housing.

D.10 Public Services

Facts/Effects:

- i. Development of future projects under the WSGVAP in combination with other cumulative projects throughout the County may result in the need for increased staffing for existing facilities, additional fire protection facilities, and relocation of present fire protection facilities. Operational funding for LACoFD and other fire departments serving related cumulative projects in adjacent areas comes from a variety of sources, including property taxes, sales taxes, user taxes, vehicle license fees, and deed transfer fees. These funds are allocated annually in a manner designed to provide for adequate staffing levels and facilities to serve future developments throughout Los Angeles County. All future projects developed under the WSGVAP would be required to pay all applicable developer fees and comply with relevant federal, State, and local laws and regulations to minimize impacts related to fire protection services. Therefore, the Project's incremental contribution to impacts on fire protection services would not be cumulatively considerable (Impact 4.15-2 (i)).
- ii. Cumulative development in the County would incrementally increase the demand for law enforcement services to serve new population and development. Operational funding for LASD and other police departments serving related projects in adjacent areas comes from a variety of sources, including property taxes, sales taxes, user taxes, vehicle license fees, and deed transfer fees. All future projects developed under the WSGVAP would be required to pay all applicable developer fees and comply with relevant federal, State, and local laws and regulations to minimize impacts related to Sheriff's services. Therefore, the Project's incremental contribution to impacts on Sheriff services would not be cumulatively considerable (Impact 4.15-2 (ii)).

- iii. Cumulative development in the County would incrementally increase the demand on the various school districts within the County in order to serve new population and development. However, State law requires residential development projects to pay established school impact fees in accordance with Sections 65995 and 66000 of the California Government Code prior to the issuance of a building permit. Therefore, the fees authorized for collection this section are conclusively deemed full and adequate mitigation of impacts on school district facilities. Therefore, the Project's incremental contribution to impacts on school services would not be cumulatively considerable (Impact 4.15-2 (iii)).
- iv. The Project's contribution to a cumulative impact with respect to the overuse and degradation of existing park facilities and the construction or expansion of additional parks and recreation facilities are considered in Section 4.14, Recreation (Impact 4.15-2 (iv)).
- v. When the Project's incremental impacts are considered in combination with the incremental impacts of past, present, and reasonably foreseeable future projects, the Project's incremental contribution to library services would be cumulatively considerable. However, the Project would cause a potential significant impact that could be avoided/reduced to less than significant with the incorporation of the library facilities mitigation fee. Present and future projects would be required to pay a fee to reduce the impacts that new development will have on the library system by funding the expansion of library facilities. Since the Project would not induce regional population growth beyond SCAG projections, the demand for libraries would be consistent with regional demand projections and would not increase the cumulative demand compared to current projections. The library facilities fee would mitigate cumulative impacts on the Los Angeles County Library system. As a result, the Project's contribution to cumulative demands for libraries would not be considerable (Impact 4.15-2 (v)).

Mitigation: No mitigation measures are required to reduce cumulative impacts to public services.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to public services.

D.11 Recreation

Facts/Effects:

- i. Adherence to existing regulations, General Plan policies, WSGVAP policies, Implementation Programs, and strategies and guidance from the DPR 2016 PNA and 2022 PNA+ Final Reports would ensure that the funding for parkland acquisition and park development, operation, and maintenance would be proportional to increases in population pursuant to the Quimby Act, additional funding mechanisms including, Prop A and Measure A, and collaboration with other agencies, school districts, and organizations, and cumulative impacts would be less than significant (Impact 4.16-4).
- ii. The majority of cumulative projects for the construction or expansion of these facilities would be discretionary and would be required to demonstrate compliance with CEQA prior to project approval; existing federal, state, and local regulations, would mitigate potential adverse impacts to the environment that may result from the expansion of parks, recreational facilities, and trails. Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact associated with construction recreational facilities (Impact 4.16-5).
- iii. The Project is not anticipated to have a significant impact on regional trail connectivity, it would not contribute to a cumulative impact on regional trail connectivity. Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact associated with interference with regional trail connectivity (Impact 4.16-6).

Mitigation: No mitigation measures are required to reduce cumulative impacts to recreation below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to recreation.

D.12 Utility and Service Systems

Facts/Effects:

- i. While adoption of the WSGVAP would increase land use and zoning densities and development intensity, which could result in population growth, this projected growth under the WSGVAP would be consistent with the anticipated growth accounted for in the County's adopted Housing Element and slightly larger than the Southern California Association of Governments' (SCAG's) population growth forecast for the region through the buildout horizon of 2045. However, the difference in growth between SCAG's forecasts and the WSGVAP would be approximately 1.5 percent, which is not considered substantial; therefore, the anticipated growth under the WSGVAP is considered generally consistent with SCAG's regional population forecasts. Therefore, the increased demand on utilities associated with the projected growth under the WSGVAP would be accounted for in the utility providers service plans. As such, implementation of the WSGVAP would not cause or contribute a cumulatively considerable contribution to a significant cumulative impact relating to the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities (Impact 4.19-6).
- ii. Cumulative water demands could exceed planned levels of supply, which could potentially require building new water treatment facilities or expanding existing facilities beyond what is currently planned for in existing capital improvement plans for water infrastructure and facilities. As discussed above, construction and installation of new conveyance and distribution infrastructure would be the responsibility of MWD and the County. The MWD and the County's water suppliers would also be responsible to plan, design and construct these new water supply facilities, and would also be subject to individual CEQA review and clearance to determine whether any would have significant environmental impacts. Therefore, the Project's incremental contribution to impacts would not be cumulatively considerable (Impact 4.19-7).
- iii. The County has the capacity to treat wastewater from cumulative projects at existing wastewater treatment plants and additional policies and goals outlined in the General Plan will ensure that future projects do not exceed the combined capacity of wastewater treatment plants in Los Angeles County. Given that the Project would not induce regional population growth beyond SCAG projections, regional wastewater treatment facilities would accommodate the local increases without increasing overall regional demand projections. As a result, the Project's contribution to cumulative demands for utilities would not be considerable (Impact 4.19-8).
- iv. Solid waste generated by the buildout of the WSGVAP would not exceed State or local standards, or exceed the capacity of the County's landfills, or otherwise impair the attainment of solid waste reduction goals. Additionally, future projects developed under the WSGVAP in combination with other cumulative projects would be required to comply with AB 939, which requires the County to construct new solid waste infrastructure if its capacity will be exhausted in 15 years. Therefore, cumulative impacts related to generation of solid waste are considered less than significant (Impact 4.19-9).
- v. Disposal of solid waste generated by cumulative development as well as the Project would be subject to the requirements set forth in AB 939, AB 341, and the policies in the Los Angeles County Integrated Waste Management Plan. Moreover, the majority of future cumulative projects would be required to

comply with the applicable federal, State, and local laws and regulations, which would require diversion of 80 percent of solid waste generated in the unincorporated county areas from landfills by 2025; 90 percent by 2035; and 95 percent or more by 2045. Furthermore, the County is committed to maintaining 15 years' worth of identified disposal capacity in conformance with AB 939. As such, implementation of the WSGVAP in combination with other cumulative projects would comply with applicable regulations related to management and reduction of solid waste. As a result, the Project's contribution to cumulative impacts would not be cumulatively considerable (Impact 4.19-10).

Mitigation: No mitigation measures are required to reduce cumulative impacts to utilities and service systems below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to utilities and service systems.

D.13 Wildfire

Facts/Effects:

- i. The WSGVAP and all other cumulative projects in the County are subject to a number of emergency response plans, most notably the County's OAERP and All-Hazard Mitigation Plan, which provides guidance for the County's response to emergency situations, including wildfire and emergency evacuation. The WSGVAP and all other cumulative projects in the County are also subject to compliance with the numerous federal, State, and County laws, regulations, polices, and development standards adopted to ensure new adequate access for emergency response and evacuation. Regulatory compliance would ensure that implementation of the WSGVAP would not combine with potential cumulative projects and result in a significant cumulative impact related to impairment of an adopted emergency response plan or emergency evacuation plan (Impact 4.20-5).
- ii. Compliance with all applicable federal, State, and local laws and regulations would require the Project and all cumulative projects to adhere with requirements relating to emergency planning and preparedness, fire service features, building services and systems, access requirements, water supply, fire and smoke protection features, building materials, construction requirements, defensible space and vegetation management, and specific requirements for specialized uses involving flammable and hazardous materials. Therefore, impacts associated with accidental ignitions and would also reduce impacts associated with wildfires encroaching onto sites from adjacent areas. Therefore, a cumulatively significant effect would not occur (Impact 4.20-6).
- iii. Any new development within Los Angeles County, including unincorporated areas, would be subject to Title 32 of the County Code. Compliance with the County Fire Code would ensure that any new development would have adequate access for emergency vehicles and personnel, and adequate water and pressure to meet flow standards. Compliance with the County Fire Code would also ensure that any developments located within VHFHSZs, including associated infrastructure improvements, would be properly designed, constructed, and inspected prior to and during occupancy. In this regard, future fire risks would be addressed at the design and construction stage of a given project before potential impacts could result. Infrastructure included with future cumulative projects, including those proposed under the WSGVAP, would be evaluated as part of the CEQA project-level review, which would identify any potentially significant impacts and mitigation requirements to address those impacts. As such, cumulative impacts associated with the provision and maintenance of new infrastructure to serve future proposed development is considered less than significant (Impact 4.20-7).
- iv. All future cumulative projects, including those proposed under the WSGVAP, would be required to comply with all applicable federal, State, and local laws and regulations, including but not limited to

the NPDES permits and SWPPP, CBC, County Building Code, County LID Ordinance. In addition, any development proposed in these areas would be subject to engineering and permit review as part of the County approval process, and potential constraints associated with upslope areas or other factors would be evaluated at the time of application and appropriate design standards implemented prior to issuance of building permits. Based on these considerations, the effect of implementation of the Project in combination with other cumulative projects would not create a cumulatively considerable effect (Impact 4.20-8).

Mitigation: No mitigation measures are required to reduce cumulative impacts to wildfire below a level of significance.

Finding: The County finds that the Final PEIR and the record of proceedings contain substantial evidence establishing that the Project will not result in significant cumulative effects on the environment with respect to wildfire.

D.14 Tribal Cultural Resources

Facts/Effects:

- i. All future projects developed under the WSGVAP would be required to comply with all regulatory requirements as well as implement Mitigation Measure 4.18-1, which would require tribal consultation to ensure tribal cultural resources are properly identified. In addition, all future projects developed under the WSGVAP requiring discretionary approval would be required to undergo subsequent project-level planning and environmental review in accordance with CEQA. These projects would similarly require compliance with the provisions of AB 52 and SB 18 (as applicable) and that project-specific mitigation measures are identified to reduce impacts on these resources, as prescribed in Mitigation Measure 4.18-1. All of the tribes identified on the County's tribal consultation lists would be contacted on a project-by-project basis as projects are proposed under the WSGVAP, including the FTBMI and the Kizh Nation, to ensure tribal consultation and project-specific mitigation measures are incorporated into the planning and environmental review process of each discretionary project proposed under the WSGVAP. Therefore, the Project's contribution to this potentially significant cumulative impact would not be cumulatively considerable (Impact 4.18-2).

Mitigation: Implementation of Mitigation Measure 4.18-1 is required to reduce impacts below a level of significance.

Finding: The County finds that changes or alterations have been required in, or incorporated into, the Project would help to reduce the severity of the cumulative impact to tribal cultural resources.

D.15 Aesthetics

Facts/Effects:

- i. Notwithstanding compliance with objective and quantitative County policies and standards and the adoption of General Plan and zoning amendments as part of the WSGVAP, the extent of physical change that could occur in many areas under the Project would result in a considerable contribution to the significant cumulative impact on scenic vistas. Given the Project's plan for higher density development than currently exists in the Plan Area, no feasible mitigation measures are available to reduce this significant or unavoidable impact (Impact 4.1-6).
- ii. The implementation of policies included in the Project and the County's General Plan that would guide the design of future development in these areas, would be anticipated to lessen this effect to the extent

that such development would integrate into the existing character of those communities, would have gradual transitions between areas of differing density, and would not have an adverse impact to existing views of the WSGVAP area from elevated vantage points, as are available from regional riding, hiking, and multi-use trails. For this reason, development that would occur pursuant to the Project would be anticipated to have a less-than-cumulatively-considerable impact on the significant cumulative impact to views from regional riding, hiking, or multi-use trails (Impact 4.1-7).

- iii. The proposed changes within the WSGVAP would not be visible from the currently designated portion of SR-2. I-210 is identified by Caltrans as eligible for designation as a state scenic highway, and this segment passes through La Crescenta-Montrose. Proposed land use zoning modifications in La Crescenta-Montrose primarily consist of areas being designated for mixed use development along Foothill Boulevard. Due to intervening topography and soundwalls along the I-210, future development along Foothill Boulevard would not be visible from this portion of the I-210. For this reason, implementation of the Project is not anticipated to substantially damage scenic resources within a state scenic highway, and its contribution to a potentially significant cumulative impact to scenic resources would be less-than-cumulatively considerable (Impact 4.1-8).
- iv. New developments of increased density, greater scale, and increased building heights than what currently exists in many areas could result in potentially adverse effects to visual character and the quality of public views. While policies of the WSGVAP would guide future development to be visually compatible with the existing visual characteristics of the WSGV community where development would occur, the extent of physical change and the associated alteration to the existing landscape, including potential obstruction of public views, would still be considered substantial. Given that the WSGVAP together with cumulative developments could result in higher density development than what currently exists in the Plan Area, no feasible mitigation is available to reduce this impact. Therefore, cumulative impacts are considered significant and unavoidable. (Impact 4.1-9).
- v. Anticipated development patterns within the WSGVAP would not preclude other cities and counties within West San Gabriel Valley viewsheds from developing substantial new sources of light or glare. For this reason, there would be a potential cumulatively significant impact related to the creation of new sources of substantial light or glare, which could adversely affect day or nighttime views in the West San Gabriel Valley area. However, with the application of relevant County policies related to the control of sources of light and glare, implementation of the Project would have a less-than-cumulatively-considerable contribution to this potentially significant cumulative impact (Impact 4.1-10).

Mitigation: No feasible mitigation measures are available to reduce the cumulative impact related to aesthetics to a less than significant level.

Finding: The County has determined that no feasible mitigation measures are available to reduce the cumulative impact related to aesthetics to a less than significant level. Based on the Final PEIR and the record of proceedings, the Project would result in a significant and unavoidable cumulative impact related to aesthetics.

D.16 Air Quality

Facts/Effects:

- i. The Project would not conflict with AQMP construction, land use, and transportation strategies that are intended to reduce construction emissions, VMT, and resulting regional mobile source emissions. In addition, construction and operation would not conflict with growth projections as the County continues to coordinate with SCAQMD and SCAG to ensure county-wide growth projections, land use planning efforts, and local development patterns are accounted for in the regional planning and air quality planning processes. As such, a cumulatively considerable impact would be less than significant (Impact 4.3-5).

- ii. The cumulative analysis of air quality impacts follows SCAQMD’s guidance such that construction or operational project emissions would be considered cumulatively considerable if project-specific emissions exceed an applicable SCAQMD recommended significance threshold. Future development facilitated by adoption of the Project may result in construction or operational emissions that could exceed the SCAQMD significance thresholds. Therefore, the cumulative impact would remain significant and unavoidable (Impact 4.3-6).

Mitigation: No feasible mitigation measures are available to reduce the cumulative impact related to air quality to a less than significant level.

Finding: The County has determined that no feasible mitigation measures are available to reduce the cumulative impact related to air quality to a less than significant level. Based on the Final PEIR and the record of proceedings, the Project would result in a significant and unavoidable cumulative impact related to air quality.

D.17 Biological Resources

Facts/Effects:

- i. Due to the loss of common habitats and diminished resource availability that could occur under buildout of the WSGVAP, impacts to special-status species remain significant at the cumulative level. It is presumed that direct impacts to special-status species and their habitats would be mitigated, as feasible, with other cumulative projects in other regions of the cumulative impacts study area. However, the significant incremental contribution of future individual projects under the WSGVAP, when taken into consideration with the cumulative projects’ impacts to special-status species over the span of the buildout of WSGVAP, is cumulatively considerable and are significant and unavoidable (Impact 4.4-8).
- ii. Depending on the location of future projects developed under the WSGVAP, construction and operation could result in significant impacts to riparian and other sensitive natural communities. The significant incremental contribution of future projects under the WSGVAP, when taken into consideration with the cumulative projects’ impacts to riparian and other sensitive natural communities over the span of the buildout of the WSGVAP, would be cumulatively considerable. Therefore, cumulative impacts to sensitive natural communities are considered significant and unavoidable (Impact 4.4-9).
- iii. Depending on the location of future WSGVAP projects, construction could result in impacts to state and/or federally protected wetlands or waters, particularly those located in proximity to water bodies. Implementation of Mitigation Measure 4.4-1 would require identification of state and federally protected wetlands and waters, implementation of avoidance and minimization measures, obtaining necessary permits, and compensatory mitigation for projects that would result in the direct removal, filling, or other alteration of protected aquatic resources. Impacts would be less than significant with mitigation. Presuming that impacts to wetlands would be similarly mitigated in other regions of the cumulative impacts study area, cumulative impacts would be less than significant with mitigation (Impact 4.4-10).
- iv. There are no proposed changes to the zoning or land use intensities within oak woodlands or other unique native woodlands that would result habitat loss or conversion. As such, there would be no cumulative impacts to oak woodlands or other unique native woodlands (Impact 4.4-11).
- v. While there are no proposed changes that increase intensities of the existing zoning or land use intensities within regional wildlife linkages or SEAs, future construction could result in impacts to nesting resident and migratory birds such as through disruption of nesting activity due to construction-related noise and direct removal of active nests associated with construction or vegetation removal/disturbance. Implementation of mitigation measure 4.4-2 would avoid and/or minimize

impacts to nesting avian species and active nest at the project level. Thus, the significant incremental contribution of future individual projects under the WSGVAP, when taken into consideration with the cumulative projects' impacts to wildlife movement and corridors over the span of the WSGVAP, is less than significant with mitigation incorporated (Impact 4.4-12).

- vi. Future individual projects implementing the WSGVAP's goals, policies, strategies, and implementation actions would also be consistent with those identified in the General Plan, as well as other local, state, and federal regulations, for the protection of biological resources. Impacts would be less than significant at the WSGVAP level. Similarly, applicable County policies and ordinances pertaining to biological resources protection would be applied to projects within the cumulative impacts study area. Therefore, cumulative impacts would be less than significant (Impact 4.4-13).

Mitigation: No feasible mitigation measures are available to reduce the cumulative impact associated with special-status species and their habitats, and sensitive natural communities. Implementation of Mitigation Measures 4.4-1 and 4.4-2 are required to reduce impacts below a level of significance for impacts related to aquatic, wetland, or riparian habitat, and related to nesting birds.

Finding: The County has determined that no feasible mitigation measures are available to fully reduce the cumulative impact related to biological resources to a less than significant level. Based on the Final PEIR and the record of proceedings, the Project would result in a significant and unavoidable cumulative impact related to biological resources.

D.18 Cultural Resources

Facts/Effects:

- i. The County has a rich prehistoric and historic archaeological record. Because all historical resources are unique and nonrenewable members of finite classes, projects that destroy or alter them could cause or contribute to a significant cumulative impact on historical resources. For these reasons, future cumulative development within the County in combination with future projects developed under the Area Plan could result in a substantial adverse change in the significance of existing and future historical resources. Future projects developed under the WSGVAP that involve ground-disturbance would be required comply with all applicable federal, State, and local laws and regulations; be subject to subsequent environmental review, which could identify project-specific mitigation measures; and would be required to implement Mitigation Measure 4.5-1 to reduce impacts to historic resources to the greatest extent feasible. However, since the timing and location of these future projects are unknown at this time, it would be speculative to determine if project-specific mitigation measures are feasible and/or are able to reduce significant impacts to a less than significant level. Therefore, the Project's contribution to this potentially significant cumulative impact would be considerable. Cumulative impacts to historic resources are considered significant and unavoidable (Impact 4.5-5).
- ii. Cumulative projects located throughout the County would have the potential to result in a cumulative impact associated with the loss of archaeological resources through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a resource would be materially impaired. Even with existing laws and regulations in place designed to protect archaeological resources, individual archaeological resources would still have the potential to be impacted as a result of construction associated with cumulative projects and the Project. Therefore, even with implementation of Mitigation Measures 4.5-2 through 4.5-6, the Project's incremental contribution to cumulative archaeological resource impacts would be cumulatively considerable. Cumulative impacts to archaeological resources are considered significant and unavoidable (Impact 4.5-6).

- iii. Potentially significant cumulative impact to paleontological resources could occur as a result of ground disturbance associated with cumulative project in combination with future projects developed under the WSGVAP. Based on geologic mapping and paleontological sensitivity, future development under the WSGVAP in the South Monrovia Islands and South San Gabriel communities have the potential to impact paleontological resources. However, all future projects in these communities that involve ground disturbance would be required to comply with applicable laws and regulations as well as implement Mitigation Measures 4.5-7 through 4.5-9, which would reduce impacts to paleontological resources to a less-than-significant level. Therefore, the Project's incremental contribution to cumulative archaeological resource impacts would not be cumulatively considerable (Impact 4.5-7).
- iv. Future project developed under the WSGVAP would comply with all applicable federal, State and local laws and regulations associated with the inadvertent discovery and treatment of human remains, including Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5. To further ensure impacts to unknown buried human remains would be reduced to the greatest extent feasible, Mitigation Measure 4.5-10 would be implemented by all future projects developed under the WSGVAP that involve ground disturbance. Therefore, regulatory compliance and implementation of Mitigation Measure 4.5-10 would ensure the Project's incremental contribution to cumulative impacts to human remains would not be cumulatively considerable. Cumulative impacts to paleontological resources are considered less-than-significant with mitigation incorporated (Impact 4.5-8).

Mitigation: No feasible mitigation measures are available to fully reduce the cumulative impact associated with historic and archeological resources. Implementation of Mitigation Measures 4.5-1 through 4.5-6 are required to reduce the severity of cumulative impacts, but they would remain significant and unavoidable. Implementation of Mitigation Measures 4.5-1 through 4.5-10 are required to reduce impacts below a level of significance for impacts related paleontological resources and human remains.

Finding: The County has determined that no feasible mitigation measures are available to fully reduce the cumulative impact related to cultural resources to a less than significant level. Based on the Final PEIR and the record of proceedings, the Project would result in a significant and unavoidable cumulative impact related to cultural resources.

D.19 Noise

Facts/Effects:

- i. Determining the exact location and potential noise levels of future construction and operational activities from projects developed under the WSGVAP would be considered speculative at this time. Future projects developed under the WSGVAP would be required to comply with the County's Noise Ordinance. Nonetheless, it is possible that the construction and operation of future projects developed under the WSGVAP and other projects in the vicinity could occur in proximity to each other and sensitive receptors. Since the timing and location of these future projects are unknown at this time, it would be speculative to determine if site-specific or cumulative mitigation measures, including Mitigation Measures 4.13-1 and 4.13-2, are feasible and/or are able to reduce potentially significant impacts to a less-than-significant level. Therefore, cumulative construction and operational impacts would remain significant and unavoidable (Impact 4.13-4).
- ii. Construction and operation of future development facilitated by adoption of the WSGVAP could combine with the incremental vibration impacts of other cumulative projects, which may include truck and bus routes; projects near active railroad tracks (within 200 feet, according to the FTA's vibration screening distances); projects that use construction vehicles or heavy-duty construction equipment typically associated with substantial vibrational impacts (such as pile drivers, jackhammers, impact hammers, and earth compaction tools), or could cause or contribute to a significant impact related to

localized groundborne vibration and/or groundborne noise, and thus, disturb nearby receptors or cause structural damage. Since the timing and location of these future projects are unknown at this time, it would be speculative to determine if site-specific or cumulative mitigation measures, including Mitigation Measure 4.13-3, are feasible and/or are able to reduce potentially significant impacts to a less-than-significant level. Therefore, cumulative construction vibration impacts are considered significant and unavoidable (Impact 4.13-5).

- iii. The WSGV Planning Area is not located within the vicinity of a private airstrip, airport land use plan, or public or public use airport. Since future projects developed under the WSGVAP would result in a less than significant impact, even if other projects were to be developed within the vicinity of an airport, impacts would still be less than significant because future development facilitated by adoption of the WSGVAP would not in construction or operational impact within the vicinity of an airport and would not increase noise impacts. Therefore, cumulative noise impacts would not expose people residing or working in the project area to excessive noise levels in the vicinity of an airport (Impact 4.13-6).

Mitigation: No feasible mitigation measures are available to fully reduce the cumulative impact associated with construction and operational noise and vibration. Implementation of Mitigation Measures 4.13-1 through 4.13-3 are required to reduce the severity of cumulative impacts, but they would remain significant and unavoidable.

Findings: The County has determined that no feasible mitigation measures are available to fully reduce the cumulative impact related to noise to a less than significant level. Based on the Final PEIR and the record of proceedings, the Project would result in a significant and unavoidable cumulative impact related to noise.

D.20 Transportation

Facts/Effects:

- i. The Project would not contribute to a cumulative impact with respect to consistency with programs, plans, policies, and ordinances. Cumulative impacts are considered less than significant (Impact 4.17-5).
- ii. The Project may result in cumulatively considerable significant impacts to VMT per service population, although the cumulative impact of the proposed Area Plan traffic along with other regional growth will be reduced through Mitigation Measures 4.17-1 and 4.17-2, along with regional programs that are the responsibility of other agencies such as cities within the Planning Area and Caltrans. In addition, the goals and policies of the WSGVAP would result in a decrease in VMT per capita by prioritizing transit-oriented development, mixed use development, as well as safe and accessible multimodal transportation circulation improvements. Future plans and programs implemented by cities within the WSGV Planning Area would also be subject to the State and regional policies that encourage or require similar improvements and reductions in VMT per capita and per service population. However, if these programs and policies are not implemented by the agencies with the responsibility to do so, the cumulative transportation and traffic impacts would remain significant and unavoidable. Under these circumstances, the WSGVAP could result in a cumulatively significant traffic impact and as such, are considered significant and unavoidable (Impact 4.17-6).
- iii. The Project would not contribute to a cumulatively considerable impact related to hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (Impact 4.17-7).
- iv. Implementation of the Project would not contribute to a cumulatively considerable impact related to inadequate emergency access. Cumulative impacts are considered less than significant (Impact 4.17-8).

Mitigation: No feasible mitigation measures are available to fully reduce the cumulative impact associated with transportation. Implementation of Mitigation Measures 4.17-1 and 4.17-2 are required to reduce the severity of cumulative impacts, but they would remain significant and unavoidable.

Finding: The County has determined that no feasible mitigation measures are available to fully reduce the cumulative impact related to transportation to a less than significant level. Based on the Final PEIR and the record of proceedings, the Project would result in a significant and unavoidable cumulative impact related to transportation.

3 Evaluation of Alternatives

In accordance with State CEQA Guidelines Section 15126.6(a), an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The Project's objectives are provided above within Section 1.2, *Overview of the Proposed Project*.

State CEQA Guidelines Section 15126.6(b) states that the selection of project alternatives “shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” Because the Project would result in significant and unavoidable environmental impacts after implementation of the mitigation measures, the County considered alternatives to the Project specifically to reduce those impacts. State CEQA Guidelines Section 15126.6(f) further direct that “the range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” State CEQA Guidelines Section 15126.6(f) goes on to say that the “range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.”

The PEIR considers a total of six alternatives to the Project. Three alternatives were considered but were not selected for further analysis due to a failure to meet most of the basic Project Objectives, infeasibility, and/or an inability to avoid significant environmental impacts, and in accordance with the criteria established in State CEQA Guidelines Section 15126.6(c). Three alternatives were comprehensively evaluated in the Draft PEIR, including the “no project” alternative, the dispersed growth alternative, and the Housing Element/RHNA only alternative. State CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR, and that if the “no project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment.

The alternatives considered or evaluated in the Draft PEIR include:

- Alternative Location/Alternative Sites (rejected from further consideration in the Draft PEIR)
- Reduced Development (rejected from further consideration in the Draft PEIR)
- Reduced Vehicle Miles Traveled (VMT) Alternative

- No Project Alternative (evaluated in detail in the Draft PEIR)
- Dispersed Growth Alternative (evaluated in detail in the Draft PEIR)
- Housing Element/RHNA Only Alternative (evaluated in detail in the Draft PEIR).

The impacts of each of alternative evaluated in detail in the Draft PEIR are compared to the Project's impacts in Draft PEIR Chapter 5, *Alternatives*, with a summary of comparative impacts provided in in Draft PEIR Table 5-1.

3.1 Alternatives Considered and Rejected

According to State CEQA Guidelines Section 15126.6(c), the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic Project Objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives that were considered but rejected after initial analysis include the Alternative Location/Alternative Sites Alternative, which seeks to put the project in another location, the Reduced Development Project Alternative which would reduce or eliminate the amount of candidate parcels proposed for re-designation, and the Reduced VMT Alternative, which outlines how reducing VMT is infeasible.

a) Alternative Location/Alternative Sites

Pursuant to Section 15126.6(f)(2) of the State CEQA Guidelines, the County considered the potential for alternative locations to the Project. As stated in Section 15126.6(f)(2)(A), the key question and first step in analyzing alternative sites is whether any of the significant effects of a project would be avoided or substantially lessened by putting that project in another location. Only locations that would avoid or substantially lessen any of the significant effects of a project need to be considered in the PEIR.

Finding. The County rejects the Alternative Location/Alternative Sites Alternative and it is not evaluated in the Draft PEIR.

Basis for finding: The WSGVAP is an Area Plan specific to the West San Gabriel Valley, which is itself a specific geographic location. The main land use strategies of the WSGVAP is to focus growth in targeted areas (growth strategy) and to conserve natural, hazard, and wildland-urban interface (WUI) areas (preservation strategy) within the WSGV Planning Area. Specifically, the WSGVAP proposes land use and zoning modifications to increase land use and zoning densities and development intensity primarily along commercial corridors and major roadways as well as in select few existing low-density residential areas near commercial corridors and transit. In addition, the WSGVAP proposes to decrease densities in hazard areas, WUI areas, and areas within or adjacent to natural resource areas. These modifications aim to create more defined community centers with neighborhood-serving small business commercial uses integrated with mixed-used development along existing commercial corridors, where residents would be able to easily access commercial, retail, and community-serving uses, such as plazas and urban open spaces.

In order to achieve the desired smart-growth within the WSGV Planning Area, the County determined that targeted growth areas would be largely near commercial centers and other amenities such as parks, schools and libraries where new residents can easily access everyday goods and services on foot. Due to the nature of creating pedestrian friendly development, the County could not consider alternative locations outside of

the identified planning radii because the effectiveness of locating residential uses near commercial centers and transit as a way to foster smart growth decreases as the distance between the two uses increase.

For the existing agricultural-zoned properties currently serving as residential uses, the County would rezone these properties for residential uses to create consistency between the County's land use and zoning documents and existing use of those properties. Similarly, the County would also streamline zoning to create consistencies throughout the WSGV, which in turn could create new residential uses. For both of these zoning processes, the parcels that meet the County's existing land use and zoning designations would be applicable, where alternative sites or locations that do not match the County's zoning criteria would not apply. Therefore, due to the nature of land use and zoning designations being site-specific, the County could not consider alternative sites or alternative locations for these two zoning processes. For preserving natural areas and directing development away from hazard areas, the County would rezone hazard areas and natural resource areas to limit impacts from potential future development.

Therefore, due to the nature of the Area Plan being connected with the West San Gabriel Valley and the locations of the proposed land use and zoning modifications identified for the growth and preservation strategies being site-specific, the County could not consider alternative sites or alternative locations. For the reasons listed above, the County rejected the alternative site or location alternative as it would not achieve the objectives of the Project and would not foster the desired type of development within the WSGV Planning Area. This alternative was not further evaluated within the Draft PEIR.

b) Reduced Development Project

Finding. The County rejects the Reduced Development Project Alternative and it is not evaluated in the Draft PEIR.

Basis for finding: The County considered an alternative that would reduce or eliminate the amount of candidate parcels proposed for re-designation under the proposed land use and zoning amendments as a way to reduce environmental impacts compared to the Project (hereinafter refer to as the Reduced Development Alternative). However, the Reduced Development Alternative was rejected as it would not allow for the increase in designated residential uses throughout the WSGV Planning Area that is necessary to accommodate the County's share of the regional housing needs allocation (RHNA) established by the Southern California Association of Governments (SCAG) for the 6th Cycle planning period. Furthermore, the Project would update and reorganize the existing overlapping land use plans, policies, and regulations throughout the WSGV communities, as well as simplify and streamline land use and zoning regulations for the WSGV Planning Area. In contrast, the Reduced Development Alternative would only partially achieve these land use and zoning goals, as the excluded parcels from the WSGVAP would remain subject to existing land use and zoning designations, which would create further land use and zoning inconsistencies in the WSGV Planning Area, as the entire Planning Area would not be updated as a whole. For these reasons, the Reduced Development Alternative was considered but rejected from further evaluation within the Draft PEIR.

c) Reduced VMT Alternative

Finding. The County rejects the Reduced VMT Alternative and it is not evaluated in the Draft PEIR.

Basis for finding: As discussed in Section 4.17, *Transportation*, of the Draft PEIR vehicle miles traveled (VMT) forecasts were modeled under the Project conditions through the building horizon of 2045 (refer to the *West San Gabriel Valley Area Plan Vehicle Miles Traveled Analysis Memorandum*, prepared by Fehr and Peers, in Appendix I of the Draft PEIR). Based on the results of the VMT modeling conducted for the Project, implementation of the WSGVAP through 2045 would result in a 1.1 percent difference in total daily VMT per service population compared to the No Project 2045 scenario (refer to Table 4.17-5, *WSGVAP Cumulative VMT Summary*, in Section 4.17, *Transportation*, of the Draft PEIR). Since the difference between the Project and the No Project scenarios is relatively slight, identifying an alternative aimed at reducing the Project's VMT's impacts while being distinguishable from the Project was determined to be infeasible. For this reason, the Reduced VMT Alternative was considered but rejected from further evaluation within the Draft PEIR.

3.2 Alternatives Analyzed in the PEIR

a) No Project Alternative

As specified in Section 15126.6(e)(3)(A), when a project is the revision of an existing land use or regulatory plan or policy or an ongoing operation, the No Project Alternative (Alternative 1) will be the continuation of the plan, policy, or operation into the future. Therefore, the No Project Alternative, as required by the State CEQA Guidelines, would analyze the effects of not adopting and implementing the WSGVAP. Future development under the No Project Alternative would continue to be guided by the existing General Plan land use and zoning designations. The No Project Alternative would result in the continuation of existing conditions and planned development within the County as no land use or zoning amendments would be processed under this alternative. No new significant environmental impacts or an increased severity of environmental impacts identified in the County's General Plan, including the updated Housing Element, or Community Plan EIRs would occur under this alternative because it would retain the current General Plan and Community Plan land use designations and policy provisions.

Finding. The County rejects the No Project Alternative and finds that the alternative is infeasible because it would not fully achieve the Project Objectives.

Basis for finding: Although the No Project Alternative would reduce the Project's significant and unavoidable aesthetic impact to a less than significant level, it would also result in three new significant and unavoidable impacts associated with GHG emissions, hazards and hazardous materials, and wildfire. Furthermore, while the significance conclusion would be the same as the Project, Alternative 1 would result in more severe impacts related to biological resources, geology and soils, energy, and transportation as Alternative 1 would not reduce the land use intensities in hazards or wildland urban interface areas and the smart growth of developing near commercial centers and major roadways would not be provided. Finally, while the significance conclusion would be the same as the Project, Alternative 1 would result in less severe impacts related to population and housing, as growth would occur at a slower rate as projected in the County's General Plan and Communities Plans. This alternative would not accomplish any of the Project objectives.

b) Dispersed Growth Alternative

Under the Dispersed Growth Alternative (Alternative 2) the WSGVAP would not be adopted as the long-range planning document for the WSGV Planning Area. Alternative 2 would be similar to the Project as it would propose the same amount of potential growth, allowing up to 10,874 additional units to be developed

within the WSGV Planning Area. Unlike the Project, the potential future growth would not be located primarily along commercial corridors and major roadways but would be dispersed throughout the nine WSGV communities. Alternative 2 would still result in the same number of allowable units and potential population increase. Alternative 2 would not include the proposed administrative “cleanup” of zoning data applicable to the Project area (e.g., rezoning of A-1 parcels to be consistent with existing General Plan designations), and would not introduce new or revise existing development standards under the Project’s proposed PASD. Alternative 2 would have no proposed modifications to the land use intensity in areas with hazards and natural resource areas. Under Alternative 2, individual projects could require a General Plan Amendment and a Zone Change if the proposed densities and development intensities would be increased above existing levels.

Finding. The County rejects the Dispersed Growth Alternative and finds that the alternative is infeasible because it would not fully achieve the Project Objectives.

Basis for finding: Implementation of Alternative 2 would result in similar impacts for the majority of issue areas as identified for the Project, with the exception of hazards and hazardous materials and land use and planning, which would result in two new significant and unavoidable impacts. Hazards and hazardous materials are site-specific and regulatory compliance and mitigation measures cannot guarantee the reduction of impacts to a less than significant level. Since the timing, intensity, and location of future development permitted under Alternative 2 is unknown at this time, it is speculative at this time to assume that all future projects would be able to reduce this impact to a less than significant level under Alternative 2; thus, the potential impact remains significant and unavoidable.

Additionally, Alternative 2 would result in a new significant and unavoidable impact to land use and planning. Since development would not have a planning document guiding the potential growth, future development projects under Alternative 2 may conflict with the County’s General Plan or other regional land use plans adopted to avoid or mitigation impacts on the natural or built environment. Furthermore, while the significance conclusion would be the same as the Project, Alternative 2 would result in more severe impacts related to air quality, biological resources, energy, geology and soils, greenhouse gas emissions, mineral resources, transportation and wildfire, as Alternative 2 would not reduce the land use intensities in hazards or wildland urban interface areas nor focus growth along commercial corridors and major roadways with access to transit.

c) Housing Element/Regional Housing Needs Allocation (RHNA) Only Alternative

Under the Housing Element/RHNA Only Alternative (Alternative 3), only implementation of zoning recommendations from the recently adopted Housing Element Update would occur, which was guided by SCAG’s 6th Cycle RHNA. Thus, buildout of the Alternative 3 would include a targeted redesignation/rezoning program to accommodate development of approximately 7,479 additional dwelling units, which would generate a new population of approximately 17,875 additional residents. Under Alternative 3, the redesignation of certain residential and commercial areas to facilitate additional housing and local-serving businesses would not occur, and land use intensity in areas with hazards and natural resources would not be altered. Alternative 3 would also not include the proposed administrative “cleanup” of zoning data applicable to the Project area (e.g., rezoning of A-1 parcels to be consistent with existing General Plan designations), and would not introduce new or revise existing development standards under

the Project's proposed PASD. Under Alternative 3, the WSGVAP would not be adopted. Under Alternative 3, individual projects could require a General Plan Amendment and/or a Zone Change if the proposed densities and development intensities would be increased above existing levels in order to implement the recommendations within the recently adopted Housing Element Update.

Finding. The County rejects the Housing Element/RHNA Only Alternative and finds that the alternative is infeasible because it would not fully achieve the Project Objectives.

Basis for finding: Implementation of Alternative 3 would result in similar impacts for the majority of issue areas as identified for the Project. While the significance conclusion would be the same as the Project, Alternative 3 would result in more severe impacts related to biological resources, geology and soils, and wildfire, as Alternative 3 would not reduce the land use intensities in hazards or wildland urban interface areas. Alternative 3 would have the same population and housing significance conclusion as the Project, but impacts would be reduced because implementation of Alternative 3 would not encourage development to the extent of the Project (3,395 units less than the Project). Alternative 3 would facilitate the implementation of the Housing Element Update by increasing housing units within the WSGV Planning Area, which is one of the overarching goals of the Project, but Alternative 3 would not provide the community benefits of the WSGVAP.

3.3 Environmentally Superior Alternative

Section 15126.6 of the State CEQA Guidelines requires that an "environmentally superior" alternative be identified and the reasons for such a selection be disclosed and if the No Project Alternative is identified as environmentally superior, then the EIR is required to identify an alternative from among the others evaluated as environmentally superior. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of adverse impacts. As detailed in Chapter 5 of the Draft PEIR (see Table 5-1), the No Project Alternative would reduce the Project's significant and unavoidable aesthetics impact but would also result in three new significant and unavoidable impacts associated with GHG emissions, hazards and hazardous materials, and wildfires. Therefore, this alternative is not the environmentally superior alternative.

Alternative 2 and 3 would result in similar impacts and would partially achieve the Project objectives. However, since Alternative 2 would increase the severity of many of the Project's impacts due to the dispersed development of the same number of allowable units as the Project, impacts under this Alternative would overall be greater than the Project. While Alternative 3 would not reduce any of the Project's significant and unavoidable impacts, this Alternative would reduce the impacts related to population and housing due to having fewer potential units than the Project. Alternative 3 would not reduce land use densities in hazardous and natural resources areas and would have more severe biological, geological, mineral resource, and wildfire impacts than the Project. Lastly, Alternative 3 would result in similar impacts to all other issue areas as compared to the Project. Therefore, Alternative 3 would be considered the environmentally superior alternative.

However, while Alternative 3 would reduce the severity of the Project impacts, this Alternative would not fully achieve the Project's objectives nor provide the Project's benefits to the same extent as the Project. This Alternative would not include the proposed administrative "cleanup" of zoning data applicable to the Project area (e.g., rezoning of A-1 parcels to be consistent with existing General Plan designations), and

would not introduce new development standards or revise existing development standards under the Project's proposed PASD. Additionally, this Alternative would not include implementation of the WSGVAP, which contains the benefits of providing for the diverse needs of the WSGV communities, incentivizing neighborhood-serving small business commercial centers integrated with mixed-use development, conserving natural resources and direct development away from hazard areas, preserving existing industrial uses, and improving urban greening in commercial corridors.

4 Findings Regarding the Final PEIR

The Responses to Comments, provided as Chapter 2 of the Final PEIR, includes the comments received during the public review period on the Draft PEIR, as well as the County's responses to these comments. The focus of the Responses to Comments is on the disposition of significant environmental issues as raised in the comments, as specified by State CEQA Guidelines Section 15088(c). The County provided a written proposed response to each public agency on comments made by that public agency pursuant to State CEQA Guidelines Section 15088(b).

The purpose of the Final PEIR is to respond to all comments received by the County regarding the environmental information and analyses contained in the Draft PEIR. Corrections and Addition to the PEIR, provided as Chapter 3 of the Final PEIR, includes any clarifications/corrections to the text, tables, figures, and appendices of the PEIR generated either from responses to comments or independently by the County. The County finds that comments made on the Draft PEIR, the responses to these comments, and revisions to the PEIR clarify or update the analysis presented in the document but do not change the analysis or conclusions of the PEIR. Accordingly, no significant new information, as described in State CEQA Guidelines Section 15088.5, was added to the PEIR after the Draft PEIR was made available for public review.

The comments, responses to comments, and the clarifications to the PEIR do not trigger the need to recirculate the PEIR pursuant to State CEQA Guidelines Section 15088.5. These changes merely clarify or update the discussion but do not change the analysis or conclusions of the PEIR. Based on the analysis in the Draft PEIR, the comments received, and the responses to these comments, no substantial new environmental issues have been raised that have not been adequately addressed in the PEIR. Also, no changes to the analysis or conclusions of the PEIR are necessary based on the comments, the responses to the comments, and the revisions to the PEIR.

All feasible mitigation measures are included in the Mitigation Monitoring and Reporting Program (MMRP) that will be adopted if the County approves the Project. As discussed above, the County finds that specific economic, legal, social, technological, or other considerations, make it infeasible to mitigate significant impacts with respect to aesthetics, air quality, biological resources, cultural resources, noise, and transportation.

Nonetheless, as indicated above, some significant and unavoidable impacts will remain, and all of the feasible mitigation measures are included in the Project's MMRP, which will be adopted by the County if the Project is approved. The MMRP ensures implementation of the mitigation measures and provides the following information: (1) the full text of the mitigation measure and the impact statement(s) to which it applies; (2) the agency responsible for enforcing implementation of the mitigation measure; (3) the phase of the Project during which the measure would be monitored; and (4) the agency responsible for monitoring

implementation of the mitigation measure. The MMRP is provided in Chapter 4 of the Final PEIR. For significant and unavoidable impacts, a Statement of Overriding Considerations has been prepared to provide substantial evidence that the Project's benefits outweigh its significant environmental impacts and will be adopted by the County if the Project is approved. The Statement of Overriding Considerations is provided in Section 5 of these Findings of Fact.

5 Statement of Overriding Considerations

The County finds on the basis of the Final PEIR and the record of proceedings in this matter that the unavoidable significant impacts of the Project and the unavoidable significant cumulative impacts are acceptable when balanced against the benefits of the Project. This determination is based on the following factors and the substantial public, social, economic, and environmental benefits flowing from the Project as identified in the Final PEIR and the record of proceedings in the matter.

The Final PEIR identifies significant environmental effects that will occur as a result of implementation of the WSGVAP. With implementation of the Project's mitigation measures and regulatory requirements, as discussed in the Final PEIR, these effects can be mitigated to levels considered less than significant, except for significant and unavoidable impacts in the areas of aesthetics, air quality, biological resources, cultural resources, noise and transportation as described above.

Considering the information contained in and related to the Final PEIR, and pursuant to State CEQA Guidelines Section 15092, the County finds that in approving the Project, it has eliminated or substantially lessened all significant and potentially significant effects of the Project on the environment where feasible as shown in these Findings. The County further finds that it has balanced the economic, social, technological, and other benefits of the Project against the remaining unavoidable environmental risks in determining whether to approve the Project and has determined that those benefits outweigh the unavoidable risks and that those risks are acceptable. The County makes this statement of overriding considerations in accordance with State CEQA Guidelines Section 15093 in support of approval of the Project. Specifically, in the County's judgment, the benefits of the Project, as proposed, outweigh the significant and unavoidable impacts, and the Project should be approved. The following provides the County's rationale:

- The proposed WSGVAP will improve connectivity and walkability by creating pedestrian-friendly, accessible neighborhoods with complete streets.
- The proposed WSGVAP will strengthen community identity and culture through inclusion of multi-functional spaces and facilities that foster play, social cohesion, cultural inclusivity, exploration, dining, recreation, and entertainment throughout the WSGV Planning Area.
- The proposed WSGVAP promotes economic development by attracting a wide range of businesses, including small businesses and non-profits, to create neighborhood-serving commercial centers/corridors integrated with mixed-use development with diverse options for housing, shopping, entertainment, recreation, and amenities.
- The proposed WSGVAP would preserve areas within or adjacent to natural resources or hazard areas and in the wildland-urban interface by decreasing land use densities and development intensities.
- The proposed WSGVAP would create strong community identity through public art, street beautification, and activities and programming centered around the community centers.

Accordingly, the County hereby concludes that the Project's benefits outweigh and override its unavoidable significant impacts for the reasons stated above. The County reached this decision after having: (1) adopted all feasible mitigation measures, (2) rejected as infeasible alternatives to the Project, (3) rejected alternatives that do not fully meet the Project objectives (4) recognized all significant, unavoidable impacts, and (5) balanced the benefits of the Project against its significant and unavoidable impacts.

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