INITIAL STUDY

FOR THE

WHITTIER COMSTOCK MULTI-FAMILY PROJECT

Prepared for:

City of Whittier
13230 Penn Street
Whittier, California 90602

Prepared by:

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LIST OF ABBREVIATIONS AND ACROYNMS

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ACM	Asbestos-containing materials
APE	Area of Potential Effect
APN	Assessor Parcel Number
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
BBAQMD	Bay Area Air Quality Management District
bgs	below ground surface
BLM	Bureau of Land Management
BMPs	Best Management Practices
C&D	construction and demolition
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CBMWD	Central Basin Municipal Water District
CDFW	California Department of Fish & Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFS	cubic feet per second
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CUPA	Certified Unified Program Agency
dB	decibel
dBA	A-weighted decibel
DIF	Development Impact Fee
DTSC	Department of Toxic and Substance Control
DU/A	dwelling units per acre
EDU	equivalent dwelling unit
EIA	Energy Information Administration
EIR	Environmental Impact Report
EMS	emergency medical services
EPA	Environmental Protection Agency
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FGC	Fish & Game Code
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
GCC	Global Climate Change
GHG	Greenhouse Gas

GPEIR	General Plan EIR
GPM	gallons per minute
GSA	groundwater sustainability agency
GWP	Global Warming Potential
IEPR	Integrated Energy Policy Report
IPaC	Information for Planning and Consultation
IPCC	Intergovernmental Panel on Climate Change
IS/MND	Initial Study / Mitigated Negative Declaration
ISO	Independent Service Operator
ISTEA	Intermodal Surface Transportation Efficiency Act
ITE	Institute of Transportation Engineers
JWPCP	Joint Water Pollution Control Plant
LACDS	Sanitation Districts of Los Angeles County
LACFCD	Los Angeles County Flood Control District
LACFD	Los Angeles County Fire Department
LBV	least Bell's vireo
LID	Low Impact Development
LRA	Local Responsibility Area
LSTs	Localized Significance Thresholds
LUST	Leaking Underground Storage Tank
MCLs	maximum contaminant levels
MLD	most likely descendants
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
PCE	perchloroethene
PSI	pounds per square inch
RECLAIM	Regional Clean Air Incentive Market
RHNA	Regional Housing Needs Assessment
RPS	Renewable Portfolio Standards
RTP/SCS	Regional Transportation Plan / Sustainable Communities Strategies
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SMU	Site Mitigation Unit
SOI	Sphere of Influence
SRA	Source Receptor Area
SWPPP	Storm Water Pollution Prevention Program
SWRCB	State Water Resources Control Board
TAZ	Traffic Analysis Zone

TEA	Transportation Equity Act
USACE	U.S. Army Corps of Engineers
U-CT	Uptown Center
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish & Wildlife Services
UWSP	Uptown Whittier Specific Plan
VdB	velocity in decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
WQMP	Water Quality Management Plan
WPD	Whittier Police Department

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ENVIRONMENTAL CHECKLIST

1. Project Title: Whittier Comstock Multi-Family Project

2. Lead Agency Name: City of Whittier
   Address: 13230 Penn Street, Whittier, CA 90602

3. Contact Person: Mr. Luis G. Escobedo, AICP
   Phone Number: 562-567-9320
   E-Mail: lescobedo@cityofwhittier.org

4. Project Location: The proposed project is located at the southwest corner of the intersection of Philadelphia Street and Comstock Avenue in the City of Whittier, Los Angeles County, California. The address is 12826 Philadelphia Street and the Assessor's Identification Number [AIN] is 8139-024-027). The site is located in Section 21, Township 2 South, Range 11 West SBM as found on the USGS – Whittier Quadrangle, 7.5 Minute Series topographic. The geographic coordinates are as follows: 33.978652º, -118.038916°. Refer to Figures 1 and 2 which show the regional and site locations for the project, respectively.

5. Project Sponsor: MW Investment Group, LLC

6. General Plan Designation: Specific Plan – Uptown Whittier Specific Plan (UWSP)

7. Zoning: UWSP, Uptown Center

8. **Project Description**

Background/Location

MW Investment Group, LLC has submitted applications to the City of Whittier to construct a 52-unit multi-family residential project (proposed project) at the southwest corner of the intersection of Philadelphia Street and Comstock Avenue (the address is 12826 Philadelphia Street and the Assessor's Identification Number is 8139-024-027). Refer to Figures 1 and 2 which show the regional and site locations for the project, respectively. The site is presently occupied by an approximate 7,172 square foot (sf) medical office building that is still in operation and serving patients. The overall site encompasses approximately 0.825 net acre (about 35,915 gross sf) and the remainder of the project site is presently allocated to parking and landscaping. The project plans are provided as Appendix 1a to this Initial Study.

Project Characteristics

The Comstock Multi-Family project site is located within the Uptown Center portion of the Uptown Whittier Specific Plan (UWSP). A copy of the UWSP is provided as Appendix 2 of this Initial Study. The City has identified the following entitlements/approvals that are needed for the proposed project.

- Development Review
- Tentative Parcel Map
- Certificate of Appropriateness for Demolition Permit
- Specific Plan Amendment
- CEQA compliance

The site development plan envisions a four-story structure, parking area, and landscaping that will occupy the site of the current medical office. Figure 3 contains a rendering of the building that is proposed be constructed at the site. The 52 units on the 0.825-acre site correlates to a density of about 63.41 units per acre. Under the present design the project will provide a total of 88 parking stalls including the following:

- 24 surface parking stalls,
- 16 carports single vehicle garages,
- 4 one-car garage, and
- 44 two-car tandem;
    - 88 parking stalls total, which meets the number of stalls required by the City.

The proposed project will provide 3 accessible parking spaces, which will include 1 electric vehicle (E.V.) accessible stall of the 88 parking stalls provided.

The size of the apartment units at The Comstock Project are proposed to range from 600 square feet (sf) to 1,327 sf. Average square footage of the units is about 868 sf, and total occupiable square footage is 45,137 sf. The 52 units include 8 studio units; 33 one-bedroom units; and 11 two-bedroom units. Amenity Space at the Comstock encompasses 7,198 sf and includes the following: a leasing office, clubhouse room, fitness room, and work lounge. Additionally, the proposed project would provide two amenity decks totaling 4,232 sf. Thus, the total common open space within the project site is 7,046 sf. The gross building area proposed to make up The Comstock Project structure is 59,828 sf.

Tentative Parcel Map No. TPM22-004 (TPM 83775) will consolidate six parcels into a single 0.826 gross acre lot to facilitate development of The Comstock Project. A Certificate of Appropriateness will be required for the Demolition Permit to authorize the removal of the 7,172 square foot medical office building and associated surface parking lot.

The proposed project will require certain amendments to the Uptown Whittier Specific Plan. Specific Plan Amendment No. SPA21-0001 includes:

The following amendments shall be limited to the properties within the Park Once District, and more specifically applicable only to those that area zoned Uptown Core (U-CO) and Uptown Center (U-CT):

- Required number of parking spaces per unit would be reduced:
    - Studio from 1.5 to 1; and,
    - One bedroom from 1.5 to 1.25
- Allowance of a maximum of 50% of required spaces to be tandem (for residential projects)
- Modification to the Parking Placement provision that all parking be located at “40 and 50% lot depth” and allow parking when minimally visible from the public street(s).

The following amendment shall be limited to the properties zoned Uptown Center (U-CT):

- Maximum allowable height for towers/penthouses from 10% to 15% of the building's ground floor footprint may exceed the height limit by 1 story.

The following amendments shall apply to the entire Uptown Whittier Specific Plan boundaries:

- Requiring the residential parking stall sizes as follows:
  - Surface parking stalls from 10' x 20' to 9' x 19' (with a two-foot overhang); and,
  - Tandem stall option 10' x 38' (two-car garage).
- Removal of the requirement that all residential parking stalls be enclosed.
- Modify Building Type definitions of Commercial Block and Liner and add new definitions for Flat, Loft and Townhouse.
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This completes the description of the project characteristics.

Construction Scenario

The Construction Staging Plan is provided as Appendix 1b to this Initial Study. The anticipated construction sequence is as follows, but may be adjusted to conform to specific conditions at the time of actual construction:

1. Clear and grub, and demolish the onsite structure and pavement;
2. Preparation of subgrade;
3. Mass-grade site and parking areas;
4. Installation of the storm drain system;
5. Installation of public sewer system;
6. Installation of public water system;
7. Fine grade to prepare for surface improvements;
8. Installation of building foundations and parking areas;
9. Install private utilities, including water quality infrastructure;
10. Install curb, gutters, sidewalks and first asphalt lift;
11. Complete construction of buildings;
12. Install landscaping; place final lift of asphalt/concrete; and
13. Install signage and striping.

Most of the preceding construction activities are self-explanatory.

The buildings will be developed with a combination of wood and steel framing, and the exterior will be a mix of materials. Construction will be completed in closely spaced, sequential phases with the entirety of the horizontal construction to be completed first. This will include clearing and grubbing, grading and installation of utilities, and may also include development of internal paved areas. Once the horizontal improvements are completed, the Applicant plans to install the building and supporting infrastructure at the site. This pattern of development will continue until the Whittier Comstock Multi-Family Project has been completed. Construction should be initiated in mid- to late-2022 and the project should open for occupancy in early-2023. The project site will require about 689 cubic yards (CY) of cut and 1,219 CY of fill, with a net import of approximately 530 CY, shown on the Preliminary Grading Plan provided as Figure 4. Construction details are further discussed in the Air Quality evaluation in Appendix 5. It is anticipated that between 30 and 40 construction workers will be on site at any given time during construction. Please note that all

proposed mitigation measures identified in this document are fully incorporated into the Project Mitigation Monitoring and Reporting Program.

9. Surrounding land uses and setting: (Briefly describe the project's surroundings)

   North: Medical office building with paved surface parking lots
   South: Self-storage facility and paved surface parking lots
   East: Paved surface parking lots
   West: Commercial building, duplex and storage facility building, and paved parking lots

10. Other agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

Based on an evaluation of the specific project location, the proposed project will not require many permits from other agencies to support development of the site as The Comstock project. The amount of area to be disturbed by the whole project will be less one acre; therefore, the developer will not be required to file a Notice of Intent (NOI) for a General Construction permit to comply with the National Pollutant Discharge Elimination System (NPDES) requirements. However, a Storm Water Pollution Prevention Plan (SWPPP) must be implemented in conjunction with construction activities. No other permits or agency requirements have been identified in association with the proposed project.

11. Have California Native American tribes traditionally and cultural affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

The City has been contacted by two Tribes under Assembly Bill (AB) 52: the Gabrieleño Band of Mission Indians and the Soboba Band of Luiseño Indians. The tribes were contacted to initiate the AB-52 process on October 29, 2021 to notify the tribes of the proposed project through mailed letters. During the 30-day consultation period, the Gabrieleño Band of Mission Indians (Gabrieleño Band) was the only tribe to respond. The Gabrieleño Band requested that mitigation be incorporated to ensure protection of potential tribal cultural resources within the project site. This mitigation is discussed further under Subsection XVIII, Tribal Cultural Resources, below.

> Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- ☒ Aesthetics
- ☒ Biological Resources
- ☒ Geology / Soils
- ☒ Hydrology & Water Quality
- ☐ Noise
- ☐ Recreation
- ☒ Utilities / Service Systems
- ☐ Agriculture and Forestry Resources
- ☒ Cultural Resources
- ☐ Greenhouse Gas Emissions
- ☐ Land Use / Planning
- ☐ Population / Housing
- ☐ Transportation
- ☐ Wildfire
- ☒ Air Quality
- ☐ Energy
- ☒ Hazards & Hazardous Materials
- ☐ Mineral Resources
- ☐ Public Services
- ☒ Tribal Cultural Resources
- ☒ Mandatory Findings of Significance

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation, the following finding is made:

☐	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☒	Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Tom Dodson & Associates — June 2022
Prepared by — Date

Lead Agency (signature) — Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
I. AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☒	☐	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning or other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

SUBSTANTIATION: A photometric study has been prepared to demonstrate that due to building orientation or exterior treatment, no significant glare may be caused that could negatively impact drivers on the local roadways or impact adjacent land uses. This report is provided as Appendix 3. Additionally, an Arborist Report was prepared for the proposed project. It is provided as Appendix 4 to this Initial Study, and is titled "Existing Tree Inspection Report 18282 Philadelphia Street Whittier, CA" prepared by Jim Borer, Certified Arborist #496 dated January 3, 2022.

a. *Less Than Significant Impact* – Adverse impacts to scenic vistas can occur in one of two ways. First, an area itself may contain existing scenic vistas that would be altered by new development. The City of Whittier General Plan Draft Environmental Impact Report (EIR), June 2021, indicates that vistas of the Puente Hills, particularly the streets with unobstructed views that provide a wider, less obstructed viewshed of the hills, should be protected within the City. The proposed project is in a developed urban area within the Uptown area of the City of Whittier. The Comstock Multi-Family site itself does not contain any scenic vistas (currently developed with a medical office building) which could be impacted by the installation of a 4-story, 64-foot in height multi-family residential development. A scenic vista impact can also occur when a scenic vista can be viewed from the project area or immediate vicinity and a proposed development may interfere with the view to a scenic vista. The Puente Hills can be seen to the north of the project site at the street level only within the intersection of Philadelphia Street and Comstock Avenue. Views to the east are limited due to the large trees that line Philadelphia Street, and also would be limited due to adjacent and nearby 2-, 3-, 4-, and 5-story structures. In general, the City seeks to preserve mostly unobstructed views of the nearby Puente Hills.

During construction, the presence of construction equipment and related construction materials would be visible from public vantage points in the vicinity of the project site. Construction is unlikely to disturb views to the nearby hills as views to the Puente Hills are obstructed by urban development; regardless, construction impacts related to aesthetics would be temporary and short-term in nature and would not substantially affect existing scenic vistas in the area. Furthermore, given that there is an existing structure at the project site, and that views area to the nearby hills are obstructed by urban development surrounding the project site, as the Uptown area of the City has been built-out, the addition of a new 64-foot in height multi-family residential structure at this location would not obstruct any existing unobstructed views to the Puente Hills. Development of this site will involve demolition

of onsite structures and paved areas, grading to create level surfaces upon which to install the proposed apartment building, and while new structures will be in place, the views in the general area to the Puente Hills will continue to be obstructed by existing development. However, the new residents of the proposed apartments will have access to scenic vistas on the rooftop and higher floors due to the non-uniform height of the structures in the vicinity of the project site. The project is designed to fit into the existing urban development setting of the Uptown area. Additionally, given the project's location and that the site is removed from the Puente Hills by about one mile, development of this site would not result in impacts to any scenic vistas that could be viewed presently from public or private spaces. Therefore, the proposed project would have a less than significant potential to have a substantial adverse effect on a scenic vista. No mitigation is required.

b. *Less Than Significant With Mitigation Incorporated* – The Whittier General Plan EIR (GPEIR) identifies scenic resources within the City including the Uptown Whittier area, which is characterized by tree-lined, narrow, cobble-stone roads. The Envision Whittier General Plan map of Corridors, Gateways, and Landmarks (Figure I-1) illustrates the location of the Planning Area's view corridors, major and minor gateways, and key landmarks. There are a total of five existing *Ficus nitida* (Indian Laurel Trees) along Comstock Avenue and Philadelphia Street are planned to be removed in order to enable site development. The five individual Ficus trees support extensive surface roots. The trees have uplifted and damaged adjacent curbs, sidewalks, and street surfaces, and has been occurring for decades of the lives of these trees. These conditions expose the Ficus' surface root systems to be very shallow and in contact with many of these uplifted/damaged features. The Arborist Report makes the determination that, these trees would be subject to significant disaffection as the result of substantial efforts to repair the uplifting damage that they have subjected the adjacent paved surfaces and curbs in any attempt to repair and replace the same. Additionally, the trees would be subject to severe impacts to their surface root structures in any such effort. There would be additional encroachment from demolition, removal of the adjacent structures, sidewalks, curbs, and paved surfaces that would be required to comprehensively redevelop the site into the proposed Comstock Multi-Family Project. Additionally, these trees would experience significant decline to both their systemic vigor (growth systems) and structural integrity (ability to support themselves) in any such demolition and reconstruction efforts. Thus, the trees would be subject to severe decline and catastrophic failure and collapse if the trees were subject to conservation in place during such activities.

Thus, as described in the Arborist Report, these street trees should be removed and replaced, in the context of the site's redevelopment, with a species that is less invasively surface rooted, smaller in mature stature, and upright in growth form, and therefore more well-suited to the setting of multi-family building(s), more vertical spaces, and realistic street frontages planter sizes. It is the Arborist Report's recommendation that a species such as either Indian tribe crape myrtles, (Lagerstroemia x. faurei varieties) or Brisbane box, Tristania conferta. The final selection of street trees shall conform to the tree specified in the Uptown Whittier Streetscape Beautification Plan adopted by City Council on May 28, 2019 that recommends *Gingko biloba* (Maiden Hair Tree) at the corner of Philadelphia Street and Comstock Avenue and *Cassia letophylla* (Gold Medallion Tree) and *Pistacia Chinensis* (Chinese Pistache) along Comstock Avenue. These five existing trees fall under the Parkway Tree Ordinance: Per Municipal Code 12.40, residents and/or property owners are required to apply for a permit to plant, trim, or remove any tree within the parkway. As such, in order to ensure that the Applicant complies with this regulation, the following mitigation measure (MM) shall be implemented:

AES-1 The Applicant shall obtain City approval to remove any trees on site through tree removal permit(s). The Applicant shall obtain a tree removal permit pursuant to City of Whittier Municipal Code 12.40.

Within the parking lot, there are 12 *Cupania* (Carrotwood) trees that will be removed, that do not meet the criteria of the City's tree ordinance, and as such their removal would not constitute damage to scenic resources. Furthermore, these trees are mature specimens that exhibit varying degrees of poor vigor and poor structural integrity. Therein they are poor candidates for conservation within the

re-development process in any manner. The Applicant will provide appropriate replacement trees as indicated on the Landscape Plans provided within the Project Plans in Appendix 1a and in conformance to the trees specified in the Uptown Whittier Streetscape Beautification Plan adopted by City Council on May, 28, 2019. Within the project site, as it has been fully developed for many years, no rock outcroppings exist. Furthermore, according to the City's GPEIR, no scenic highways are located within the City. The City's GPEIR indicates that a variety of scenic or view corridors are formed along key major roadways including Turnbull Canyon, Skyline Drive, La Cuarta and Colima, which are currently designated as Scenic Corridors and Beverly Boulevard and Hadley, Greenleaf, Painter, Whittier Blvd and portion of Colima, which are considered Design Corridors. As the proposed project is not located adjacent to the above roadways within the City, the proposed project would not have a potential to impact such scenic resources. While the City's General Plan does identify that the Uptown portion of the City is an area of scenic importance within the City, the proposed project would not demolish any structures of scenic importance that have been identified in the City's GPEIR, especially as the existing onsite structure does not contain any historically significant or distinguishing features (refer to the Cultural Study prepared for this project that has been provided as Appendix 7) that would qualify the structure onsite as a scenic resource. Given the above, with the implementation of MM **AES-1**, implementation of the proposed Comstock Multi-Family Project would have a less than significant potential to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

c. *Less Than Significant Impact* – The proposed Comstock Multi-Family Project is located within an urbanized area within the City of Whittier, in the Uptown area of the City. Construction of the proposed project would create a temporary change in the visual character of the project site. The project is located within the Uptown Whittier Specific Plan (UWSP), and has a zone classification of Uptown Center. According to the UWSP the intent of the Uptown Center (U-CT) classification is as follows:

The U-CT zone is applied along segments of Philadelphia Street, and Comstock Avenues, as shown on the Regulating Plan, in part to provide transitions in building form and mass between areas within the U-CO zone and the U-G zone. This zone is intended for mixed-use buildings and courtyard housing, that accommodate a variety of non-residential and residential uses at lower intensities and densities than in the U-CO zone. Building types include mixed-use commercial blocks, live-work, and courtyard housing. The landscape style is urban, emphasizing shading street trees in sidewalk tree wells. Parking is accommodated on-street, in structures with liner buildings, underground, and in block centers in surface lots not visible from streets.

The UWSP provides a development code specific to development within the zoning classifications within the Specific Plan, including within the U-CT classification within which the project will be developed. The proposed project will require certain amendments to comply with the UWSP, which have been detailed in the project description that affect the entirety of the UWSP and the U-CT and U-C classifications, specifically. These amendments would enable the Comstock Multi-Family project to fully comply with the UWSP development code for the U-CT classification. By developing this vacant site in accordance with City's General Plan and in accordance with the design guidelines outlined in the Uptown Whittier Development Code as enforced by the City's Code of Ordinances (Title 18 – Zoning), the visual character of this site will continue to be an urban visual setting consistent with surrounding Uptown core development, but also consistent with the General Plan vision for the City at build-out. With the City's design elements incorporated into the project, implementation of the proposed project will be consistent with the surrounding urban setting and the potential aesthetic impacts to the site will result in a less than significant impact.

d. *Less Than Significant Impact* – The City GPEIR indicates that because the City is generally built-out and is located in an area surrounded by development, night skies are dominated by urban and suburban lighting in the more developed portions of the City. Additionally, the primary sources of glare during the day are from reflections off of roadways and structures, with the primary sources of glare during the evenings consisting of both stationary sources (structure illumination, interior lighting, decorative landscape lighting, and streetlights), and mobile sources (vehicle headlamp illumination).

The Comstock Multi-Family Project must be developed in accordance with the City of Whittier Municipal Code Section 18.96.030(J) (Site Design Guidelines), and the design guidelines provided within the Uptown Specific Plan. The City's GPEIR indicates that, while new uses and developments may result in an increase in the number of lighting sources within the City, the impacts from build-out of the General Plan were determined to be minimal in nature, and through compliance with the City's Municipal Code, impacts from future development would be less than significant. As stated above, the proposed project will comply with the City's Municipal Code, and is therefore anticipated to result in less than significant contributions to lighting and glare impacts within the City. However, to ensure that light or glare (particularly off of structures with glass exteriors) does not result in intrusive lighting or glare to existing structures or persons in the project area, a photometric study has been prepared to demonstrate that due to building orientation or exterior treatment, no significant glare may be caused that could negatively impact drivers on the local roadways or impact adjacent land uses. This report is provided as Appendix 3. Given the above the proposed Comstock Multi-Family Project would have a less than significant potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

SUBSTANTIATION

a. *No Impact* – The General Plan indicates that, according to the California Department of Conservation Important Farmland Map Finder, there is no farmland mapped within the City and Planning Area. Furthermore, no agricultural uses are located internally within the City, and as such the City has not zoned or designated any land internally for such uses. Therefore, given that the City does not identify the project site for agricultural use, and that no Prime Farmland, Unique Farmland or Farmland of Statewide Importance has been identified within the City or Planning Area, implementation of the proposed project and conversion of the project site to the proposed multi-family residential uses will not pose any significant adverse impact to agricultural resources or values. No mitigation is required.

b. *No Impact* - Implementation of the proposed project will not conflict with existing zoning classification (Specific Plan) for agricultural use, or a Williamson Act contract. There are no Williamson Act contract lands located within the City or Planning Area. Please reference the discussion in II(a), above. Based

on this information, the proposed project will not conflict with existing zoning for agricultural use, or a Williamson Act contract. No adverse impacts are anticipated and no mitigation is required.

c. *No Impact* – The City's GPEIR indicates that the Puente Hills Preserve could be considered forest land as defined by Public Resources Code Section 12220(g) in terms of tree cover. The project site is located in the Uptown core area of the City, and is therefore not located within or near the Puente Hills Preserve such that the conversion of the site to a multi-family residential use would conflict with existing forest land, timberland or timberland zoned for Timberland Production. As the proposed Comstock Multi-Family Project currently is zoned as U-CT by the UWSP, which is not a zoning classification that supports timberland or forest lands, the proposed project will not conflict with existing zoning for, or cause rezoning of, forest, timberland, or timberland zoned Timberland Production. No adverse impacts are anticipated and no mitigation is required.

d. *No Impact* – The project site is not located within forest land and has no commercial forest trees on the property; therefore, the project will not result in the loss of forest land or conversion of forest land to non-forest production use. No adverse impacts are anticipated and no mitigation is required.

e. *No Impact* – Please refer to the discussion under issue II(a), above. The City has designated the Comstock Multi-Family Project site for Specific Plan use, and is zoned as U-CT, which does not support agricultural uses. The uses in the immediate vicinity surrounding the proposed project do not currently support agricultural activities, nor do any exist within the boundaries of the City. Ultimately, the development of this site as the Comstock Multi-Family Project would not involve other changes that would result in off-site agricultural land converting to a non-agricultural use. Furthermore, there is no forest land within the Uptown Whittier Specific Plan area of the City, and as such none would be impacted by the development of the proposed project. Therefore, the proposed project would have a less than significant potential to involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

SUBSTANTIATION: An Air Quality Impact Analysis (AQIA) was prepared for the proposed project. It is provided as Appendix 5 to this Initial Study, and is titled "Whittier Residential, Air Quality Impact Analysis, City of Whittier" prepared by Urban Crossroads dated June 21, 2022.

Background and Climate Conditions

The regional climate has a substantial influence on air quality in the South Coast Air Basin (SCAB). In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality. The annual average temperatures throughout the SCAB vary from the low to middle 60s degrees Fahrenheit (°F). Due to a decreased marine influence, the eastern portion of the SCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SCAB have recorded maximum temperatures above 100°F.

Although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SCAB climate. Humidity restricts visibility in the SCAB, and the conversion of sulfur dioxide (SO_2) to sulfates (SO_4) is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SCAB is 71% along the coast and 59% inland. Since the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast.

More than 90% of the SCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately nine inches in Riverside to fourteen inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Additionally, the importance of wind to air pollution is considerable. The direction and speed of the wind determines the horizontal dispersion and transport of the air pollutants. In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution.

Because the State of California had established Ambient Air Quality Standards (AAQS) several years before the federal action and because of unique air quality problems introduced by the restrictive dispersion meteorology, there is considerable difference between state and national clean air standards. Those

standards currently in effect in California and the nation are shown in Table III-1. Sources and health effects of various pollutants are shown in Table III-2.

Table III-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Average Time	California Standards [1]		National Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O3)[8]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM10)[9]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		–		
Fine Particulate Matter (PM2.5)[9]	24 Hour	–	–	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12.0 µg/m^3	15.0 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	–	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	–	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		–	–	
Nitrogen Dioxide (NO2)[10]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemiluminescence	100 ppb (188 µg/m^3)	–	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		0.053 ppm (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO2)[11]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	–	Ultraviolet Flourescense; Spectrophotometry (Paraosaniline Method)
	3 Hour	–		–	0.5 ppm (1300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[11]	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas)[11]	–	
Lead 8[12,13]	30-Day Average	1.5 µg/m^3	Atomic Absorption	–	–	–
	Calendar Quarter	–		1.5 µg/m^3 (for certain areas)[12]	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Rolling 3-Month Avg	–		0.15 µg/m^3		
Visibility Reducing Particles[14]	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	**No Federal Standards**		
Sulfates	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

Footnotes

1 California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter – PM10, PM2.5, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2 National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year, with a 24-hour average concentration above 150 $\mu g/m^3$, is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.

3 Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4 Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.

5 National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

6 National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

7 Reference method as described by the EPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the EPA.

8 On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

9 On December 14, 2012, the national PM2.5 primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour PM2.5 standards (primarily and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM10 standards (primarily and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

10 To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

11 On June 2, 2010, a new 1-hour SO2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

12 The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

13 The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 j.tg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

14 In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Table III-2
HEALTH EFFECTS OF MAJOR CRITERIA POLLUTANTS

Pollutants	Sources	Primary Effects
Carbon Monoxide (CO)	• Incomplete combustion of fuels and other carbon-containing substances, such as motor exhaust. • Natural events, such as decomposition of organic matter.	• Reduced tolerance for exercise. • Impairment of mental function. • Impairment of fetal development. • Death at high levels of exposure. • Aggravation of some heart diseases (angina).
Nitrogen Dioxide (NO_2)	• Motor vehicle exhaust. • High temperature stationary combustion. • Atmospheric reactions.	• Aggravation of respiratory illness. • Reduced visibility. • Reduced plant growth. • Formation of acid rain.
Ozone (O_3)	• Atmospheric reaction of organic gases with nitrogen oxides in sunlight.	• Aggravation of respiratory and cardiovascular diseases. • Irritation of eyes. • Impairment of cardiopulmonary function. • Plant leaf injury.
Lead (Pb)	• Contaminated soil.	• Impairment of blood function and nerve construction. • Behavioral and hearing problems in children.
Fine Particulate Matter (PM-10)	• Stationary combustion of solid fuels. • Construction activities. • Industrial processes. • Atmospheric chemical reactions.	• Reduced lung function. • Aggravation of the effects of gaseous pollutants. • Aggravation of respiratory and cardio respiratory diseases. • Increased cough and chest discomfort. • Soiling. • Reduced visibility.
Fine Particulate Matter (PM-2.5)	• Fuel combustion in motor vehicles, equipment, and industrial sources. • Residential and agricultural burning. • Industrial processes. • Also, formed from photochemical reactions of other pollutants, including NOx, sulfur oxides, and organics.	• Increases respiratory disease. • Lung damage. • Cancer and premature death. • Reduces visibility and results in surface soiling.
Sulfur Dioxide (SO_2)	• Combustion of sulfur-containing fossil fuels. • Smelting of sulfur-bearing metal ores. • Industrial processes.	• Aggravation of respiratory diseases (asthma, emphysema). • Reduced lung function. • Irritation of eyes. • Reduced visibility. • Plant injury. • Deterioration of metals, textiles, leather, finishes, coatings, etc.

Source: California Air Resources Board, 2002.

Regional Air Quality

Air pollution contributes to a wide variety of adverse health effects, Table III-2. The Environmental Protection Agency (EPA) has established National Ambient Air Quality Standards (NAAQS) for six of the most common air pollutants: carbon monoxide, lead, ozone, particulate matter, nitrogen dioxide, and sulfur dioxide which are known as criteria pollutants. The South Coast Air Quality Management District

(SCAQMD) monitors levels of various criteria pollutants at 37 permanent monitoring stations and 5 single-pollutant source Pb air monitoring sites throughout the air district. On February 21, 2019, California Air Resources Board (CARB) posted the 2018 amendments to the state and national area Pollutant level designations. Table III-3 outlines the attainment designations for SCAB.

Table III-3
ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SCAB

Pollutant	State Status	National Status
Ozone – 1-hour standard	Nonattainment	—
Ozone – 8-hour standard	Nonattainment	Nonattainment
Carbon monoxide (CO)	Attainment	Attainment/Unclassified
Nitrogen dioxide (NO_2)	Attainment	Attainment/Unclassified
Sulfur dioxide (SO_2)	Attainment	Attainment/Unclassified
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
Lead[1] (Pb[1])	Attainment	Attainment/Unclassified

Note: See Appendix 3.1 (part of Appendix 5, AQIA) for a detailed map of State/National Area Designations within the SCAB
"—" = The national 1-hour O3 standard was revoked effective June 15, 2005.
[1] The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.

Local Air Quality

The project site is located within the Source Receptor Area (SRA) 11 of the SCAB. Within SRA 11, the SCAQMD South San Gabriel Valley monitoring station, located 6.18 miles southeast of the project site, is the nearest long-term air quality monitoring station for CO, NO_2, O_3 and $PM_{2.5}$. The South San Gabriel Valley monitoring station does not include data for PM_{10}. As such, the next nearest monitoring station will be used. The East San Gabriel Valley 2 monitoring station, located in SRA 9, is the next nearest monitoring station for PM_{10} and is located approximately 12.71 miles northeast of the project site. It should be noted that the East San Gabriel Valley 2 monitoring station was utilized in lieu of the South San Gabriel Valley monitoring station only in instances where data was not available.

The most recent 3 years of data available is shown on Table III-4, which identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the project site. Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ for 2018 through 2020 was obtained from the SCAQMD Air Quality Data Tables. Additionally, data for SO_2 has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO_2 concentrations.

Standards of Significance

The criteria used to determine the significance of potential project-related air quality impacts are taken from the Initial Study Checklist in Appendix G of the State CEQA Guidelines (14 CCR §§15000, et seq.), which are listed at the beginning of this section. The SCAQMD has also developed regional significance thresholds for other regulated pollutants, as summarized at Table III-5. The SCAQMD's CEQA Air Quality Significance Thresholds (March 2015) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Table III-4
PROJECT AREA AIR QUALITY MONITORING SUMMARY 2018-2020

Pollutant	Standard	Year		
		2018	2019	2020
O_3				
Maximum Federal 1-Hour Concentration (ppm)		0.115	0.108	0.169
Maximum Federal 8-Hour Concentration (ppm)		0.082	0.091	0.114
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	3	5	20
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	5	7	23
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	2.0	1.9	3.1
Maximum Federal 8-Hour Concentration	> 20 ppm	1.8	1.5	1.7
NO_2				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	76.8	61.8	69.2
Annual Federal Standard Design Value		18.3	17.6	17.8
PM_{10}				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	> 150 $\mu g/m^3$	101	97	105
Annual Federal Arithmetic Mean ($\mu g/m^3$)		27.1	20.8	25.2
Number of Days Exceeding Federal 24-Hour Standard	> 150 $\mu g/m^3$	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 $\mu g/m^3$	20	3	9
$PM_{2.5}$				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	> 35 $\mu g/m^3$	35.40	29.60	35.40
Annual Federal Arithmetic Mean ($\mu g/m^3$)	> 12 $\mu g/m^3$	12.31	10.34	13.22
Number of Days Exceeding Federal 24-Hour Standard	> 35 $\mu g/m^3$	0	0	0

ppm= Parts Per Million
Source: SCAQMD Historical Air Quality Data by Year, Air Quality Data Tables

Table III-5
MAXIMUM DAILY REGIONAL EMISSIONS THRESHOLDS

Pollutant	Construction Thresholds	Operations Thresholds
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Pb	3 lbs/day	3 lbs/day

Source: Regional Thresholds presented in this table are based on the SCAQMD Air Quality Significance Thresholds, April 2019

Impact Analysis

a. *Less Than Significant Impact* – Projects such as the proposed Comstock Multi-Family Project do not directly relate to the Air Quality Management Plan (AQMP) in that there are no specific air quality programs or regulations governing general development. Conformity with adopted plans, forecasts and programs relative to population, housing, employment and land use is the primary yardstick by which impact significance of planned growth is determined. The project site is located within the SCAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the SCAG, county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards.

Currently, these state and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

In March 2017, the AQMD released the Final 2016 AQMP. The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal Clean Air Act (CAA) requirements. The project's consistency with the AQMP will be determined using the 2016 AQMP as discussed below.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993). These indicators are discussed below:

Consistency Criterion No. 1: The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

The violations that Consistency Criterion No. 1 refers to are the California Ambient Air Quality Standards (CAAQS) and NAAQS. NAAQS and CAAQS violations would occur if regional or localized significance thresholds were exceeded.

Construction Impacts – Consistency Criterion 1

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if Localized Significance Thresholds (LSTs) or regional significance thresholds were exceeded. Based on the analysis herein, the project's localized construction-source emissions would not exceed applicable regional significance thresholds or LST. As such, the project is consistent with the AQMP with regard to regional construction-source air quality.

Operational Impacts – Consistency Criterion 1
As evaluated, the project's localized operational-source emissions would not exceed applicable regional significance thresholds or LST. As such, the project would result in a less than significant impact with respect to this criterion.

On the basis of the preceding discussion, and the lack of thresholds exceedances the project is determined to be consistent with the first criterion.

Consistency Criterion No. 2: The project will not exceed the assumptions in the AQMP based on the years of project build-out phase.

The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the SCAB are provided to the Southern California Association of Governments (SCAG), which uses these to develop and the Regional Housing Needs Assessments (RHNA) for each jurisdiction along with regional population and vehicle miles travelled (VMT) growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with these growth projections is considered to be consistent with the AQMP. Consistency can be evaluated using several methods, including, but not limited to, consistency with a local jurisdiction's land use designations and consistency with SCAG's jurisdictional growth projections, such as those in the RHNA.

Construction Impacts – Consistency Criterion 2
Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities.

Operational Impacts – Consistency Criterion 2
The Comstock Multi-family site is located within the Uptown Center of the Uptown Whittier Specific Plan and designates the project site as "Uptown Center". The Uptown Center designation allows for mixed-use buildings and courtyard housing that allow for non-residential and residential uses at a lower intensity than other zones. Types of buildings include mixed-use commercial blocks, live-work, and courtyard housing with an urban landscape style. As previously stated, the total development is proposed to consist of 52 multifamily residential units on 0.84 acres. The Specific Plan allows for residential uses. The submitted Specific Plan Amendment addresses development standards for unit sizes, lot coverage and parking (stall sizing, location and ratio by use). Therefore, the proposed project would not require a Specific Plan amendment to allow the proposed residential development.

The proposed project would be consistent with UWSP land use and would not be expected to exceed regional growth projections.

On the basis of the preceding discussion, the project is determined to be consistent with the second criterion.

AQMP Consistency Conclusion
The project would not result in or cause NAAQS or CAAQS violations, as the project's construction and operational emissions would not exceed the applicable threshold of significance. The project would also be consistent with the City of Whittier land use plans. As such, the project is therefore considered to be consistent with the AQMP.

b. *Less Than Significant With Mitigation Incorporated* – Air pollution emissions associated with the proposed project would occur over both a short and long-term time periods. Short-term emissions include fugitive dust from construction activities (i.e., site prep, demolition, grading, and exhaust emission) at the proposed project site. Long-term emissions generated by future residents of the

proposed project primarily include energy consumption and trips generated by the future development.

Emissions Calculation Methodology

In June 2021 the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model (CalEEMod) Version 2020.4.0. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NOX, SOX, CO, PM10, and PM2.5) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation. Accordingly, the latest version of CalEEMod was used for this project to determine construction and operational air quality emissions.

Construction Emissions

The proposed 52 multifamily residential units is anticipated to be constructed in a single phase. The project is anticipated to have an opening year of 2023.

Construction activities associated with the project will result in emissions of VOCs, NOX, SOX, CO, PM10, and PM2.5. Construction related emissions are expected from the following construction activities: Demolition; Site Preparation; Grading; Building Construction; Paving; and, Architectural Coating.

Grading/Excavation Activities

Dust is typically a major concern during grading and excavation activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions". Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. This analysis assumes that earthwork activities would import 530 cubic yards during the initial grading phase. All other grading phases are expected to balance on-site and no additional export of soil will be required.

Construction Worker Vehicle Trips

Construction emissions for construction worker vehicles traveling to and from the project site, as well as vendor trips (construction materials delivered to the project site) were estimated based on information from CalEEMod defaults.

Construction Duration

Construction is expected to commence in November 2022 and will continue through April 2023. The construction schedule utilized in the analysis, shown in Table III-6, represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.[1] The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines. The duration of construction activities was based on project specific data provided by the project applicant, where available.

[1] As shown in the CalEEMod User's Guide Version 2020.4.0, Section 4.3 "Offroad Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

Table III-6
CONSTRUCTION DURATION

Phase Name	Start Date	End Date	Days
Demolition	11/1/2022	11/14/2022	10
Site Preparation	11/15/2022	11/15/2022	1
Grading	11/16/2022	11/17/2022	2
Building Construction	11/18/2022	4/6/2023	100
Paving	3/31/2023	4/6/2023	5
Architectural Coating	3/31/2023	4/6/2023	5

Construction Equipment
A modification to the default equipment list was made to allow the model to more accurately calculate fugitive dust from ground disturbance for purposes of the air quality localized significance threshold. As CalEEmod does not calculate ground disturbance for the backhoes/loaders/tractors equipment, these were replaced with crawler tractors with the same horse power and load factors of the backhoes Tractors/Loaders/Backhoes equipment. A detailed summary of construction equipment assumptions by phase is provided at Table III-7

Table III-7
CONSTRUCTION EQUIPMENT ASSUMPTIONS

Phase Name	Equipment	Amount	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Rubber Tired Dozers	1	8
	Tractors/Loaders/Backhoes	2	8
Site Preparation	Crawler Tractors (T/L/B)	1	8
	Graders	1	8
Grading	Crawler Tractors (T/L/B)	1	8
	Graders	1	8
	Rubber Tired Dozers	1	8
Building Construction	Cranes	1	8
	Forklifts	2	8
	Tractors/Loaders/Backhoes	2	8
Paving	Cement and Mortar Mixers	4	8
	Pavers	1	8
	Rollers	1	8
	Tractors/Loaders/Backhoes	1	8
Architectural Coating	Air Compressors	1	8

T/L/B = Tractors, Loaders, Backhoes; E = Excavators

Construction Emission Summary
CalEEMod calculates maximum daily emissions for summer and winter periods. The estimated maximum daily construction emissions with compliance with Rules 403 and 1113 are summarized in Table III-8. Detailed construction model outputs are presented in Appendix 3.1 of the AQIA. This AQIA utilizes the “mitigated” emissions estimate in Appendix 3.1 of the AQIA to include the emissions

reductions from compliance with SCAQMD rules. With the inclusion of these measures regional emissions would be less-than-significant, as shown at Table III-8.

Table III-8
OVERALL CONSTRUCTION EMISSIONS SUMMARY

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2022	1.80	22.45	12.23	0.04	4.53	2.36
2023	67.13	17.40	21.47	0.04	1.57	0.98
Maximum Daily Summer Emissions	**67.13**	**22.45**	**21.47**	**0.04**	**4.53**	**2.36**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Winter						
2022	1.80	22.68	12.19	0.04	4.53	2.36
2023	67.14	17.42	21.26	0.04	1.57	0.98
Maximum Daily Winter Emissions	**67.14**	**22.68**	**21.26**	**0.04**	**4.53**	**2.36**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

In an effort to reduce emissions to the greatest extent feasible, the following measures shall be implemented to minimize construction emissions and impacts:

AQ-1 ***Require the use of Tier 4 emissions standards or better for off-road diesel-powered construction equipment of 50 horsepower or greater. To ensure that Tier 4 construction equipment or better will be used during the proposed project's construction, South Coast Air Quality Management District (SCAQMD) staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and California Air Resources Board (CARB) or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency shall require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance and conduct regular inspections to the maximum extent feasible to ensure compliance.***

AQ-2 ***Require zero-emissions or near-zero emission on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export) that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. The Lead Agency shall include this requirement in applicable bid documents, purchase orders, and contracts. The construction contractor shall maintain records of all trucks associated with project construction to document that each truck***

used meets these emission standards, and make the records available for inspection. The City shall conduct regular inspections to the maximum extent feasible to ensure compliance.

AQ-3 ***All trucks hauling dirt, sand, soil or other loose materials are to be covered, or should maintain at least two feet of freeboard in accordance with California Vehicle Code Section 23114 (freeboard means vertical space between the top of the load and top of the trailer).***

AQ-4 ***Enter into applicable bid documents, purchase orders, and contracts to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy. For any idling that is expected to take longer than five minutes, the engine shall be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the proposed project site. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed project site, where appropriate, stating that idling longer than five minutes is not permitted.***

AQ-5 ***The contractor shall adhere to applicable measures contained in Table 1 of Rule 403 including, but not limited to:***

- ***All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines in order to limit fugitive dust emissions.***
- ***The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.***
- ***All access points to the project site shall have track out devices installed.***
- ***The contractor shall ensure that traffic speeds on unpaved roads and project site areas are limited to 15 mph or less.***

Operational Emissions

Operational activities associated with the proposed project will result in emissions of VOCs, NOX, SOX, CO, PM10, and PM2.5. Operational emissions would be expected from the following primary sources: Area Source Emission, Energy Source Emissions, and Mobile Source Emissions.

Area Source Emissions

- Architectural Coatings: Over a period of time the buildings that are part of this project will be sources of emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of project maintenance. The emissions associated with architectural coatings were calculated using CalEEMod which include reductions from compliance with SCAQMD Rule 1113.
- Consumer Products: Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on defaults provided within CalEEMod.
- Hearths: Hearths (wood stoves and fireplaces) would generate emissions from wood fuel combustion or natural gas consumption. GHG emissions from the combustion of wood or biomass are calculated and are considered biogenic emissions of CO2. However, within the SCAQMD, per Rule 445 no wood burning devices can be installed in new construction unless natural gas service is unavailable, or the units are at an elevation of 3,000 feet or greater above

mean sea level. Therefore, this analysis assumes all fireplaces would be natural gas fueled. Based on CalEEMod defaults the modeling assumes 10% of the units would not have a hearth.

- Landscape Maintenance Equipment: Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod.

Energy Source Emissions

- Combustion Emissions Associated with Natural Gas and Electricity: Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the project area are located either outside the region (state) or offset through the Regional Clean Air Incentives Market (RECLAIM), which provides pollution credits for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity is generally excluded from the evaluation of significance and only natural gas use is considered. The emissions associated with natural gas use were calculated using CalEEMod.
- Title 24 Energy Efficiency Standards: California's Energy Efficiency Standards for Residential and Nonresidential Buildings was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020 and is included in CalEEMod.

Mobile Source Emissions

Project mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the project on peak hour traffic volumes and traffic operations in the vicinity of the project. The project-related operational air quality impacts are derived primarily from the 236 daily vehicle trips generated by the project.

Operational Emissions Summary

Operational activities for summer and winter scenarios are presented in Table III-9. Detailed operational model outputs are presented in Appendix 3.1 to the AQIA. Project operational-source emissions will not exceed the thresholds of significance and as such, a significant impact will not occur. However, in an effort to reduce emissions to the greatest extent feasible, the following measures shall be implemented to minimize construction emissions and impacts:

AQ-6 ***The project applicant shall require that all building structures meet or exceed 2016 Title 24, Part 6 Standards and meet Green Building Code Standards.***

AQ-7 ***The project applicant shall require that all faucets, toilets and showers installed in the proposed structures utilize low-flow fixtures that would reduce indoor water demand by 20% per CalGreen Standards.***

AQ-8 ***The project applicant shall require that a water-efficient irrigation system be installed that conforms to the requirements of City codes.***

AQ-9 ***The project applicant shall require that ENERGY STAR-compliant appliances are installed on-site.***

AQ-10 ***The project applicant shall require that high-efficiency lighting be installed that is at least 34% more efficient than standard lighting.***

AQ-11 No wood burning devices shall be installed in any dwelling units consistent with SCAQMD Rule 445.

Table III-9
OPERATIONAL EMISSIONS SUMMARY

Year	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
Area Source	1.34	0.83	4.62	0.01	0.09	0.09
Energy Source	0.02	0.17	0.07	0.00	0.01	0.01
Mobile Source Passenger Cars	0.72	0.79	7.42	0.02	1.71	0.01
Maximum Daily Summer Emissions	**2.08**	**1.79**	**12.12**	**0.02**	**1.81**	**0.11**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Winter						
Area Source	1.34	0.83	4.62	0.01	0.09	0.09
Energy Source	0.02	0.17	0.07	0.00	0.01	0.01
Mobile Source Passenger Cars	0.70	0.85	7.14	0.02	1.71	0.01
Maximum Daily Winter Emissions	**2.05**	**1.84**	**11.84**	**0.02**	**1.81**	**0.11**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Conclusion

With the implementation of MMs **AQ-1** through **AQ-11**, the development of the Comstock Multi-Family Project would have a less than significant potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

c. *Less Than Significant Impact* – The analysis makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the NAAQS and/or CAAQS. Collectively, these are referred to as LSTs. The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4[2]. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

For this project, the appropriate SRA for the LST analysis is the SCAQMD South San Gabriel Valley (SRA 11). LSTs apply to CO, NO_2, PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects less than or equal to 5 acres in size.

[2] The purpose of SCAQMD's Environmental Justice program is to ensure that everyone has the right to equal protection from air pollution and fair access to the decision-making process that works to improve the quality of air within their communities. Further, the SCAQMD defines Environmental Justice as "…equitable environmental policymaking and enforcement to protect the health of all residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, from the health effects of air pollution."

SCAQMD's LST Methodology clearly states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered.

Maximum Daily Disturbed-Acreage

The "acres disturbed" for analytical purposes are based on specific equipment type for each subcategory of construction activity and the estimated maximum area a given piece of equipment can pass over in an 8-hour workday (as shown on Table III-9). The equipment-specific grading rates are summarized in the SCAQMD's Fact Sheet for Applying CalEEMod to Localized Significance Thresholds and CalEEMod User's Guide Appendix A: Calculation Details for CalEEMod. It should be noted that the disturbed area per day is representative of a piece of equipment making multiple passes over the same land area. In other words, one Rubber Tired Dozer can make multiple passes over the same land area totaling 0.5 acres in a given 8-hour day. Appendix A of the CalEEMod User Manual only identifies equipment-specific grading rates for Crawler Tractors, Graders, Rubber Tired Dozers, and Scrapers; therefore, Excavators, Tractors/Loaders/Backhoes equipment that was included in site preparation or grading was replaced with crawler tractors that were adjusted to reflect the horsepower and operating profile of the Excavators, Tractors/Loaders/Backhoes equipment class.

As shown on Table III-10, the project's construction activities could disturb a maximum of approximately 2 acres per day for grading activities. However, based on the SCAQMD LST Methodology, construction impacts are assessed against a smaller acreage threshold would represent a more conservative assessment, thus this analysis bases the LST on a 1-acre site.

Table III-10
MAXIMUM DAILY DISTURBED-ACREAGE

Construction Phase	Equipment Type	Equipment Quantity	Acres graded per 8-hour day	Operating Hours per Day	Acres graded per day
Site Preparation	Crawler Tractors (T/L/B)	1	0.5	8	0.5
	Graders	1	0.5	8	0.5
Total acres disturbed per day during Site Preparation					3.5
Grading	Crawler Tractors (T/L/B)	1	0.5	8	0.5
	Graders	1	0.5	8	0.5
	Rubber Tired Dozers	1	0.5	8	0.5
Total acres disturbed per day during Grading					1.5
Minimum acres disturbed per day					**1**

Sensitive Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors". These structures typically include residences, hotels, hospitals, etc. as they are also known to be locations where an individual can remain for 24 hours. Consistent with the LST Methodology, the nearest land use where an individual could remain for 24 hours to the project site (in this case the nearest residential land use) has been used to determine construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time. The nearest receptor used for evaluation of localized impacts of PM_{10} and $PM_{2.5}$ is represented by location R-5, which represents an existing single-family

residence at 7014 Milton Avenue, approximately 36 feet west of the project site. As such, the 36-foot distance will be used for evaluation of localized PM_{10} and $PM_{2.5}$ emission impacts.

Commercial and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24 hours but are typically onsite for eight hours or less. The LST Methodology explicitly states that "*LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours*." For purposes of analysis, if an industrial/commercial use is located at a closer distance to the project site than the nearest residential use, the nearest industrial/commercial use will be utilized to determine construction and operational LST air impacts for emissions of NO_2 and CO an individual could be present at these sites for periods of one to eight hours. Since the nearest residential receptor is closer than a non-residential receptor, receptor R-5, at 36-feet, is used for the evaluation of localized impacts of NO_X and CO.

Project-related Sensitive Receptors
Receptors in the project study area are described below and are shown on Figure III-1.

R1: R1 represents the existing single-family residence at 6737 Milton Avenue, approximately 361 feet northwest of the project site and is placed at the outdoor living areas (backyards).
R2: R2 represents the Grace Brethren Church Whittier at 6704 Milton Avenue, approximately 571 feet north of the project site and is placed at the nearest building façade.
R3: R3 represents the Victory Outreach Church at 7021 Greenleaf Ave #1305, approximately 225 feet east of the project site and is placed at the nearest building façade.
R4: R4 represents an existing single-family residence at 7048 Milton Avenue, approximately 166 feet southwest of the project site and is placed at the outdoor living areas (backyards).
R5: R5 represents an existing single-family residence at 7014 Milton Avenue, approximately 36 feet west of the project site and is placed at the outdoor living areas (backyards).

Construction-Source Emissions (LST Analysis)
The localized thresholds for construction activities are determined using SCAQMD's screening look-up tables. It should be noted that the look-up tables identify thresholds at only 1 acre, 2 acres, and 5 acres. To be conservative and consistent with SCAQMD guidance, the thresholds presented in Table III-11 were calculated by interpolating the threshold values for the project's disturbance of 1-acre.

Table III-11
MAXIMUM DAILY LOCALIZED EMISSIONS THRESHOLDS

Pollutant	Construction Localized Thresholds[1]
NO_X	393 Lbs./day
CO	2,820 Lbs./day
PM_{10}	52 Lbs./day
$PM_{2.5}$	10 Lbs./day

[1] LST based on 3.5 acres of disturbance at 78 meter distance for SRA 26.
Source: Localized Thresholds presented in this table are based on the SCAQMD Final LST Methodology, July 2008

Localized Construction-Source Emissions
Table III-12 identifies the localized impacts at the nearest receptor location in the vicinity of the project. The emissions report in Table III-12 represents the maximum daily on-site emissions from any phase of construction (i.e., demolition, site preparation, grading and the combined phases of building construction, paving and architectural coatings). Emissions used in the LST shown in Table III-12 local construction emissions would be less than the applicable SCAQMD LSTs.

Table III-12
LOCALIZED SIGNIFICANCE SUMMARY OF CONSTRUCTION

On-Site Site Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	17.3	19.2	3.8	2.1
SCAQMD Localized Threshold	83	673	5	4
Threshold Exceeded?	**No**	**No**	**No**	**No**

Rule 403 requires the project to implement feasible dust control measures, including at a minimum applying water to active construction areas 3 times per day, installing track-out devices at access points, and halting operations during high wind events. Based on project modeling, LST impacts would be less than significant.

Operational-Source Emissions (LST Analysis)
The proposed project is located on approximately 0.84 acres. As previously stated, the total development is proposed to consist of 52 multiple family residential dwelling units. According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed project does not include such uses, and thus, due to the lack of significant stationary source emissions, no LST analysis is needed for operations.

CO "Hot Spot" Analysis
As discussed below, the project would not result in potentially adverse CO concentrations or "hot spots." Further, detailed modeling of project-specific CO "hot spots" is not needed to reach this conclusion. An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. At the time of the 1993 Handbook, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO.

The proposed project considered herein would generate 236 net trips and would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative Bay Area Air Quality Management District (BAAQMD) CO threshold considerations. Therefore, CO "hot spots" are not an environmental impact of concern for the proposed project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant.

Conclusion
The potential impact of project-generated air pollutant emissions at sensitive receptors has also been considered. Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors.

Results of the LST indicate that with compliance with applicable Rules, the project will not exceed the SCAQMD localized significance thresholds during construction. Therefore, sensitive receptors would not be exposed to substantial criteria pollutant concentrations during project construction, and this is considered a less than significant impact.

Results of the LST analysis indicate that the project will not exceed the SCAQMD localized significance thresholds during operational activity. Further, project traffic would not create or result in a CO "hotspot." Therefore, sensitive receptors would have a less than significant potential to be exposed to substantial pollutant concentrations as the result of project operations/occupancy.

d. *Less Than Significant Impact* – The potential for the project to generate objectionable odors has also been considered. Land uses generally associated with odor complaints include: Agricultural uses (livestock and farming); Wastewater treatment plants; Food processing plants; Chemical plants; Composting operations; Refineries; Landfills; Dairies; and, Fiberglass molding facilities. The project is a residential development and does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City of Whittier solid waste regulations. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances, including odors. Therefore, odors associated with the proposed project construction and operations would be less than significant and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IV. BIOLOGICAL RESOURCES: Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

SUBSTANTIATION: The following information utilized in this Section of the Initial Study was obtained from the U.S. Fish and Wildlife Service IPaC Trust Resources Report generated on November 30, 2021, as well as from the California Department of Fish and Wildlife California Natural Diversity Database (CNDDB) generated on November 30, 2021.

Area Background

According to the City GPEIR, the City and Planning Area support avian, reptile, and mammal species that occupy urban areas, but the vast majority of wildlife and sensitive species occur in the Puente Hills Preserve, which is in the northeastern portion of the City, away from the urban Uptown core.

The IPaC Trust Resources Report indicates that there are few listed species that occur within the Whittier area. These are:

- Coastal California Gnatcatcher (*Polioptila californica californica*)
    - This species is a United States Fish and Wildlife Service (USFWS) threatened species, and critical habitat exists for this species mainly in the Puente Hills area.
- Least Bell's Vireo (*Vireo belli pusillus*)
    - This species is a USFWS endangered species. The least Bell's vireo (LBVI) is a small, olive-gray migratory songbird that nests and forages almost exclusively in riparian woodland habitats.

- Monarch Butterfly (*Danaus plexippus*)
    - This species is a USFWS candidate species. The Monarch Butterfly's habitat consists of open fields and meadows with milkweed in the spring and summer, though they can also be found on the Coast of California during the winter.

Additionally, the City's GPEIR indicates that some parts of the Planning Area provide suitable habitat for special-status plant and wildlife species including: western spadefoot, northern harrier, burrowing owl, yellow-breasted chat, coastal California gnatcatcher, San Diego woodrat, and red-diamondback rattlesnake. Most of these species are supported by relatively undisturbed natural areas including coastal sage scrub, grassland, and riparian habitats.

Impact Analysis

a. *Less Than Significant Impact* – The project site is currently 100% developed, as it contains an existing office structure with a paved parking lot, and limited landscaping. The site itself and surrounding area contain no natural habitat and no potential to support any species identified as a candidate, sensitive or special status species within the IPaC or CNDDB reports. As described above, the City's GPEIR indicates that wildlife and sensitive species are generally most likely to occur in undeveloped areas within the City, specifically in the Puente Hills Preserve. Additionally, the City's GPEIR suggests that the policies in the adopted General Plan would encourage the addition of trees in public and private spaces which both contribute to existing and provide additional habitat resources to support wildlife. As discussed in Subsection I(b), above, the proposed project would remove five large *Ficus nitida* (Indian Laurel Trees) along Comstock Avenue and Philadelphia Street, and 12 *Cupania* (Carrotwood) trees will be removed, that do not meet the criteria of the City's tree ordinance, and would ultimately be replaced with trees specified in the Uptown Whittier Streetscape Beautification Plan adopted by City Council on May, 28, and with several other trees planned for the upper level, including an 8-tree Olive tree grove. As such, the proposed project would not conflict with the City General Plan's Goals and Policies intended to support wildlife in the City's urban areas. Ultimately, due to past disturbance within the site, no further biological studies are necessary. With no habitat or species of concern located within the project area, the development of the Comstock Multi-Family Project has a less than significant potential to impact to any native biological resources. No mitigation is required.

b. *No Impact* – As stated under issue IV(a), above, the City's GPEIR identifies the Puente Hills Preserve areas as possessing riparian habitat and sensitive communities, though none of these areas would be developed under the General Plan, which remains true for the proposed project. The proposed Comstock Multi-Family Project would develop a 52-unit apartment 4-story apartment complex within a developed site containing one office building and a parking lot. Neither the project site or surrounding area contain any riparian habitat or other sensitive natural community resources, as the project is located within the urban Uptown area of the City. Therefore, no adverse impact to riparian habitat or any native biological resources would occur from implementing the proposed project. No mitigation is required.

c. *No Impact* – As stated under issues IV(a) and (b), above, the City's GPEIR identifies the Puente Hills Preserve areas as possessing wetlands, though none of these areas would be developed under the General Plan, which remains true for the proposed project. Additionally, no state or federally protected wetlands are anticipated to occur within the urbanized areas of Whittier as water features are highly channelized in these areas. As the proposed project has been entirely developed with an office structure and parking lot, and no jurisdictional features run through the project site, or adjacent to the project site, no impacts to wetlands are anticipated to occur from the implementation of the proposed project. No mitigation is required.

d. *Less Than Significant Impact With Mitigation Incorporated* – According to the IPaC Resources Report and the CNDDB (Appendix 6) several species of migratory birds could potentially be affected by construction activities in the area. With no native habitat, and no wildlife corridors that traverse the

project site, implementation of the proposed project is not anticipated to interfere with the movement of native animals of any kind, or to impede the use of any native wildlife nursery sites. However, the project would require removal and replacement of trees on site that may be used for nesting birds, and construction could disturb nesting birds utilizing the trees adjacent to and within the site that would be retained. Therefore, the following mitigation measure is provided as a contingency in the event that any nesting birds are found at the site location:

BIO-1 ***The State of California prohibits the "take" of active bird nests. To avoid impacts to nesting birds (common and special status) during the nesting season (generally between February 1 to August 31), a qualified Avian Biologist shall conduct pre-construction nesting bird survey prior to project-related disturbance to identify any active nests. If no active nests are found, no further action would be required. If an active nest is found, the biologist shall set appropriate no-work buffers around the nest, which would be determined based on the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.***

Thus, with implementation of the above measure, any effects on wildlife movement or the use of wildlife nursery sites can be reduced to a less than significant impact.

e. *Less Than Significant With Mitigation Incorporated* – The project site is currently 100% developed with a parking lot and existing office structure. As shown on the plans provided as Appendix 1a to this Initial Study, 5 existing Indian Laurel Trees along Comstock Avenue and Philadelphia Street will be removed per City Parks Department tree removal guidelines. Within the parking lot, there are 12 Carrotwood trees that will be removed that do not meet the criteria of the City's tree ordinance, and as such their removal would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. However, as discussed under Subsection I(b), above, there are a total of five existing *Ficus nitida* (Indian Laurel Trees) along Comstock Avenue and Philadelphia Street are planned to be removed in order to enable site development. The five individual Ficus trees support extensive surface roots. The trees have uplifted and damaged adjacent curbs, sidewalks, and street surfaces, and has been occurring for decades of the lives of these trees. These trees would experience significant decline to both their systemic vigor (growth systems) and structural integrity (ability to support themselves) in any such demolition and reconstruction efforts. Thus, the trees would be subject to severe decline and catastrophic failure and collapse if the trees were subject to conservation in place during such activities. As such, and as described in the Arborist Report provided as Appendix 4, these street trees should be removed and replaced, in the context of the site's redevelopment, with a species that is less invasively surface rooted, smaller in mature stature, and upright in growth form, and therefore more well-suited to the setting of multi-family building(s), more vertical spaces, and realistic street frontages planter sizes. Implementation of MM **AES-1** would ensure that the Applicant complies with the City's tree removal ordinance (Municipal Code 12.40), thus ensuring that the project will comply with local policies or ordinances protecting biological resources.

The project has been designed to comply with the City's Municipal Code, which would ensure compliance with local policies and ordinances protecting biological resources as the City's GPEIR indicates that the Municipal Code further ensures compliance with bird and wildlife protection laws. No other local policies or ordinances protecting biological resources would apply to the proposed project, as no native biological resources exist on site. Therefore, impacts under this issue are considered less than significant with the implementation of MM **AES-1**.

f. *No Impact* – The City's GPEIR specifies that there are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans within the City or that would affect the City or Planning Area. The Puente Hills Preserve Management Plan protects the Puente Hills Preserve, and as the proposed project is located in the Uptown area of the City, project implementation would not have a potential to impact this Management Plan. As such, the proposed project would not result in any conflicts with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
V. CULTURAL RESOURCES: Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

SUBSTANTIATION: A due diligence archaeological sensitivity assessment report has been prepared to evaluate the potential for cultural resources to occur within the project area of potential effect entitled "Historic-Period Building Evaluation: Former Security-First National Bank Building, 12826 Philadelphia Street, Whittier, Los Angeles County, California" prepared by CRM TECH dated January 14, 2022, which was revised on June 9, 2022 (Appendix 7). The following summary information has been abstracted from this report. It provides an overview and findings regarding the cultural resources found within the project area.

Background

Between October 2021 and January 2022 CRM TECH performed a cultural resources study on the former Security-First National Bank building at 12826 Philadelphia Street in the City of Whittier, Los Angeles County, California. Currently vacant, the building is situated at the southwest corner of the intersection of Philadelphia Street and Comstock Avenue, in the southwest quarter of Section 21, Township 2 South Range 11 West, San Bernardino Baseline and Meridian.

The purpose of the study is to provide the City with the necessary information and analysis to determine whether the removal of the building would constitute "a substantial adverse change in the significance of a historical resource." In order to facilitate the significance evaluation of the building and to document its history and characteristics, CRM TECH conducted a cultural resources records search, pursued historical background research, contacted the local historical society, and carried out a field inspection of the building and its environs.

The results of these research procedures indicate that the building dates to 1952 and has been in use for banking, medical, dental, and other commercial purposes since then. In light of its age, the building was recorded into the California Historical Resources Inventory and designated temporarily as Site CRM TECH 3799-1H, pending assignment of a permanent identification number once the California Historical Resources Information System resumed normal operation. The building is a generally rectangular-shape masonry building with white stucco coating on the exterior walls. The primary façade, facing Philadelphia Street to the north, features a centered, deep-set front entry in the main, two-story mass framed by beveled walls and filled with a steel-framed, smoked-glass double door surrounded by plate-glass panels. A one-story addition attached to the eastern side has a similar double door on its northern elevation. The centered entry at the rear of the main mass opens to a paved parking lot, where a tall drive-up banking canopy is located. The western side of the building is blind, and the eastern side features three pairs of smoked-glass windows and an employee entrance near the rear. However, the building does not appear eligible for listing in the California Register of Historical Resources.

Based on these findings, CRM TECH concludes that former Security-First National Bank building does not meet CEQA's definition of a "historical resource." Accordingly, CRM TECH recommends to the City of Whittier a finding that the demolition of the building would not constitute "a substantial adverse change in

the significance of a historical resource." No further cultural resources investigation is recommended on this building.

Impact Analysis

a&b. *Less Than Significant With Mitigation Incorporated* – CEQA establishes that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

Significance Evaluation of On-Site Historical Resources

The results of the Cultural Resource Evaluation (Appendix 7) indicate that the former Security-First National Bank building was built in 1952 and used for its original function for many years before being converted to other commercial uses, such as dental and medical offices. At the time of its construction, Whitter's downtown core was well-established but expanding in service industry enterprises catering to the post-World War II residential boom. This building is related to that episode that helped shape the subsequent history of the city, but as one of numerous commercial buildings of similar vintage easily found across the region today, it does not demonstrate a unique, important, or particularly close association with this pattern of events or any other established themes in local and regional history.

Historical research has uncovered no evidence that the building is closely associated with any persons or specific events of recognized significance in national, state, or local history, nor have any prominent architects, designers, or builders been identified in its construction. In terms of architectural or engineering qualities, the building is not known to be an important or notable example of any architectural style, property type, period, region, or method of construction, either in relation to the original 1952 design or the 1975 remodeling, on the national, state, local, or neighborhood level.

In its current conditions, the building stands as unremarkable specimen of the Brutalist architecture that was popular among commercial and public buildings in the 1950s-1970s. What little information could be gathered from available sources on the designer for the project, Griffin and Banks, yielded no evidence that the firm gained any particular distinction or renown in the field of architecture. The contractor, Wheeler and Gray, appears to be somewhat more prominent in its field, but this building would certainly not be considered one of the firm's more prominent undertakings in its large body of work.

As an extensively altered late-historic-period building of common design and construction practice, the building does not exhibit a high level of artistic or aesthetic merit or an outstanding attention to design, detail, material, or craftsmanship. Nor does it hold the potential for any important data for the study of the history of downtown commercial development in Whittier, which is well- documented in both historical literature and contemporary publications. Based on these considerations, and in light of the criteria listed above, the present study concurs with the 2015-2016 evaluation that the former Security-First National Bank building at 12826 Philadelphia Street does not appear eligible for listing in the California Register of Historical Resources or for designation by the City of Whittier as a "historic landmark." As such, it does not meet CEQA's definition of "historical resources" in the category of "discretionary historical resources."

In light of this information and pursuant to PRC §21084.1, the following conclusions have been reached for the project:

- No historical resources within or adjacent to the project area have any potential to be disturbed as they are not within the proposed area in which the facilities will be constructed and developed,

and thus, the project as it is currently proposed will not cause a substantial adverse change to any known historical resources.

- No further cultural resources investigation is necessary for the proposed project unless construction plans undergo such changes as to include areas not covered by this study.

However, if buried cultural materials are discovered during any earth-moving operations associated with the project, the following contingency mitigation measure shall be implemented:

CUL-1 Should any cultural resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with the City. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.

With the above mitigation measure, the potential for impacts to cultural resources will be reduced to a less than significant level. No additional mitigation is required.

c. *Less Than Significant Impact* – As noted in the discussion above, no available information suggests that human remains may occur within the APE, but there is a limited potential to encounter human remains. As such, in the event that human remains are inadvertently discovered during project construction activities, the human remains could be inadvertently damaged, which could result in a significant impact. Implementation of the proposed project would comply with provisions of state law regarding discovery of human remains, including PRC Section 5097.98 and Health and Safety Code Section 7050.5. If human remains are accidentally exposed during site grading, Section 7050.5 of the California Health and Safety Code requires a contractor to immediately stop work in the vicinity of the discovery and notify the County Coroner. The Coroner must then determine whether the remains are human and if such remains are human, the Coroner must determine whether the remains are or appear to be of a Native American origin. If deemed potential Native American remains, the Coroner contacts the NAHC to identify the most likely affected tribe and/or most likely descendant (MLD). Until the landowner has conferred with the MLD, the landowner shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities consider the possibility of multiple burials. Since this process is mandatory, no mitigation is required to ensure that the impacts to human remains will be treated with dignity and result in a less than significant impact.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VI. ENERGY: Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operations?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

SUBSTANTIATION: An Energy Analysis (EA) was prepared for the proposed project. It is provided as Appendix 8 to this Initial Study and is titled "Whittier Residential, Energy Analysis, City of Whittier" prepared by Urban Crossroads dated June 21, 2022.

Existing Conditions

The most recent data for California's estimated total energy consumption and natural gas consumption is from 2018, released by the United States (U.S.) Energy Information Administration's (EIA) California State Profile and Energy Estimates in 2020 and included:

- Approximately 7,900 trillion British Thermal Unit (BTU) of energy was consumed,
- Approximately 3,444 trillion BTU of petroleum,
- Approximately 2,210 trillion BTU of natural gas, and
- Approximately 33.3 trillion BTU coal.

The California Energy Commission's (CEC) Transportation Energy Demand Forecast 2019-2030 was released in order to support the 2020 Integrated Energy Policy Report. The Transportation Energy Demand Forecast 2018-2030 lays out graphs and data supporting their projections of California's future transportation energy demand. The projected inputs consider expected variable changes in fuel prices, income, population, and other variables. Predictions regarding fuel demand included:

Gasoline demand in the transportation sector is expected to decline from approximately 15.5 billion gallons in 2017 to between 12.3 billion and 12.7 billion gallons in 2030.

Diesel demand in the transportation sector is expected to rise, increasing from approximately 3.9 billion diesel gallons in 2015 to approximately 4.7 billion in 2030.

- Data from the Department of Energy states that approximately 4 billion gallons of diesel fuel were consumed in 2017

The most recent data provided by the EIA for energy use in California by demand sector is from 2018 and is reported as follows:

- Approximately 39.1% transportation,
- Approximately 23.5% industrial,
- Approximately 18.3% residential, and
- Approximately 19.2% commercial.

In 2020, total system electric generation for California was 277,704 gigawatt hours (GWh). California's massive electricity in-state generation system generated approximately 200,475 GWh which accounted for approximately 72.2% of the electricity it uses; the rest was imported from the Pacific Northwest (8.6%) and the U.S. Southwest (19.2%). Natural gas is the main source for electricity generation at 34.23% of the total in-state electric generation system power as shown in Table VI-1. Renewables currently account for 31.7% of the total electrical system power.

Table VI-1
TOTAL ELECTRICITY SYSTEM POWER (CALIFORNIA 2020)

Fuel Type	California In-State Generation (GWh)	Percent of California In-State Generation	Northwest Imports (GWh)	Southwest Imports (GWh)	Total California Energy Mix (GWh)	Total California Power Mix
Coal	317	0.17%	194	6,963	7,474	2.74%
Natural Gas	92,298	48.35%	70	8,654	101,022	37.06%
Oil	30	0.02%	-	-	30	0.01%
Other	384	0.20%	125	9	518	0.19%
Nuclear	16,280	8.53%	672	8,481	25,434	9.33%
Large Hydro	17,938	9.40%	14,078	1,259	33,275	12.21%
Unspecified	0	0.00%	12,870	1,745	14,615	5.36%
Total Non-Renewables and Unspecified Energy	127,248	66.65%	28,009	27,111	182,368	66.91%
Biomass	5,680	2.97%	975	25	6,679	2.45%
Geothermal	11,345	5.94%	166	1,825	13,336	4.89%
Small Hydro	3,476	1.82%	320	2	3,798	1.39%
Solar	29,456	15.43%	284	6,312	36,052	13.23%
Wind	13,708	7.18%	11,438	5,197	30,343	11.13%
Total Renewables	63,665	33.35%	13,184	13,359	90,208	33.09%
Total System Energy	190,913	100.00%	41,193	40,471	272,576	100.00%

Source: CEC, 2020 Total System Electric Generation

An updated summary of, and context for energy consumption and energy demands within the State is presented in “U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts” excerpted below:

- California was the seventh-largest producer of crude oil among the 50 states in 2018, and, as of January 2019, it ranked third in oil refining capacity.
- California is the largest consumer of jet fuel among the 50 states and accounted for one-fifth of the nation’s jet fuel consumption in 2018.
- California's total energy consumption is second highest in the nation, but, in 2018, the state's per capita energy consumption was the fourth-lowest, due in part to its mild climate and its energy efficiency programs.
- In 2018, California ranked first in the nation as a producer of electricity from solar, geothermal, and biomass resources and fourth in the nation in conventional hydroelectric power generation.
- In 2018, large- and small-scale solar photovoltaic (PV) and solar thermal installations provided 19% of California’s net electricity generation.

As indicated above, California is one of the nation’s leading energy-producing states, and California’s per capita energy use is among the nation’s most efficient. Given the nature of the project, the remainder of this discussion will focus on the three sources of energy that are most relevant to the project—namely, electricity, natural gas (though not anticipated to be required for this project at this time), and transportation fuel for vehicle trips associated with the uses planned for the project.

Electricity
The usage associated with electricity use were calculated using the California Emissions Estimator Model (CalEEMod) Version 2020.4.0. The Southern California region's electricity reliability has been of concern for the past several years due to the planned retirement of aging facilities that depend upon once-through cooling technologies, as well as the June 2013 retirement of the San Onofre Nuclear Generating Station (San Onofre). While the once-through cooling phase-out has been ongoing since the May 2010 adoption of the State Water Resources Control Board's once-through cooling policy, the retirement of San Onofre complicated the situation. California Independent Service Operator (ISO) studies revealed the extent to which the South California Air Basin and the San Diego Air Basin region were vulnerable to low-voltage and post-transient voltage instability concerns. A preliminary plan to address these issues was detailed in the 2013 Integrative Energy Policy Report (IEPR) after a collaborative process with other energy agencies, utilities, and air districts. Similarly, the subsequent 2020 IEPR identifies broad strategies that are aimed at maintaining electricity system reliability.

Electricity is currently provided to the project by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE's 2019 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers.

California's electricity industry is an organization of traditional utilities, private generating companies, and state agencies, each with a variety of roles and responsibilities to ensure that electrical power is provided to consumers. The California ISO (Independent Service Operator) is a nonprofit public benefit corporation and is the impartial operator of the State's wholesale power grid and is charged with maintaining grid reliability, and to direct uninterrupted electrical energy supplies to California's homes and communities. While utilities still own transmission assets, the ISO routes electrical power along these assets, maximizing the use of the transmission system and its power generation resources. The ISO matches buyers and sellers of electricity to ensure that enough power is available to meet demand. To these ends, every five minutes the ISO forecasts electrical demands, accounts for operating reserves, and assigns the lowest cost power plant unit to meet demands while ensuring adequate system transmission capacities and capabilities.

Part of the ISO's charge is to plan and coordinate grid enhancements to ensure that electrical power is provided to California consumers. To this end, transmission file annual transmission expansion/ modification plans to accommodate the State's growing electrical needs. The ISO reviews and either approves or denies the proposed additions. In addition, and perhaps most importantly, the ISO works with other areas in the western United States electrical grid to ensure that adequate power supplies are available to the State. In this manner, continuing reliable and affordable electrical power is assured to existing and new consumers throughout the State.

Table VI-2 identifies SCE's specific proportional shares of electricity sources in 2019. As indicated in Table VI-2, the 2019 SCE Power Mix has renewable energy at 35.1% of the overall energy resources. Geothermal resources are at 5.9%, wind power is at 11.5%, large hydroelectric sources are at 7.9%, solar energy is at 16%, and coal is at 0%.

Natural Gas
Natural gas is available from a variety of in-state and out-of-state sources and is provided throughout the state in response to market supply and demand. Complementing available natural gas resources, biogas may soon be available via existing delivery systems, thereby increasing the availability and reliability of resources in total. The CPUC oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout the State.

Table VI-2
SCE 2019 POWER CONTENT MIX

Energy Resources	2019 SCE Power Mix
Eligible Renewable	**35.1%**
Biomass & waste	0.6%
Geothermal	5.9%
Small Hydroelectric	1.0%
Solar	16.0%
Wind	11.5%
Coal	**0%**
Large Hydroelectric	**7.9%**
Natural Gas	**16.1%**
Nuclear	**8.2%**
Other	**0.1%**
Unspecified Sources of power*	32.6%
Total	**100%**
* "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.	

Transportation Energy Sources
The project would generate additional vehicle trips with resulting consumption of energy resources, predominantly gasoline and diesel fuel. In March 2019, the Department of Motor Vehicles identified 36.4 million registered vehicles in California, and those vehicles consume an estimated 17.8 billion gallons of fuel each year.[3] Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the project patrons and employees via commercial outlets.

California's on-road transportation system includes 394,383 land miles, more than 27.5 million passenger vehicles and light trucks, and almost 8.1 million medium- and heavy-duty vehicles. While gasoline consumption has been declining since 2008 it is still by far the dominant fuel. Petroleum comprises about 91% of all transportation energy use, excluding fuel consumed for aviation and most marine vessels. Nearly 17.8 billion gallons of on-highway fuel are burned each year, including 14.6 billion gallons of gasoline (including ethanol) and 3.2 billion gallons of diesel fuel (including biodiesel and renewable diesel). In 2019, Californians also used 194 million cubic feet of natural gas as a transportation fuel, or the equivalent of 183 billion gallons of gasoline.

Evaluation Criteria
In compliance with Appendix G of the *State CEQA Guidelines,* this report analyzes the project's anticipated energy use during construction and operations to determine if the project would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

In addition, Appendix F of the *State CEQA Guidelines,* states that the means of achieving the goal of energy conservation includes the following:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas and oil; and
- Increasing reliance on renewable energy sources.

[3] Fuel consumptions estimated utilizing information from EMFAC2017.

Summary of Energy Demands

Construction Energy Demands
The estimated power cost of on-site electricity usage during the construction of the project is assumed to be approximately $616.20. Additionally, based on the assumed power cost, it is estimated that the total electricity usage during construction, after full project build-out, is calculated to be approximately 4,930 kWh.

Construction equipment used by the project would result in single event consumption of approximately 3,420 gallons of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the project's proposed construction process that are unusual or energy-intensive, and project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies.

CCR Title 13, Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Best available control measure is to inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

Construction worker trips for full construction of the project would result in the estimated fuel consumption of 2,090 gallons of fuel. Additionally, fuel consumption from construction vendor and hauling trips (MHDTs and HHDTs) will total approximately 944 gallons. Diesel fuel would be supplied by regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved using bulk purchases, transport and use of construction materials. The 2020 IEPR released by the CEC demonstrates that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements. As supported by the preceding discussions, project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Operational Energy Demands
Transportation Energy Demands: Annual vehicular trips and related VMT generated by the operation of the project would result in a fuel demand of 30,022 gallons of fuel.

Fuel would be provided by current and future commercial vendors. Trip generation and VMT generated by the project are consistent with other mixed residential and commercial uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers Trip Generation Manual (11th Ed., 2021); and CalEEMod. As such, project operations would not result in excessive and wasteful vehicle trips and VMT, nor excess and wasteful vehicle energy consumption compared to other residential developments of similar size.

In addition, enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT in the future. Location of the project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. The project would implement sidewalks, facilitating and encouraging pedestrian access. Facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption. In compliance with the California Green Building Standards Code and City requirements, the project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long-term bicycle parking accommodations. As supported by the preceding discussions, project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Facility Energy Demands: Project facility operational energy demands are estimated at: 679,463 kBTU/year of natural gas; and 200,166 kWh/year of electricity. Natural gas would be supplied to the project by SoCalGas; electricity would be supplied by SCE. The project proposes conventional residences that reflect contemporary energy efficient/energy conserving designs and operational programs. The project does not

propose uses that are inherently energy intensive and the energy demands in total would be comparable to other residential developments of similar scale and configuration.

Lastly, the project will comply with the applicable Title 24 standards. Compliance itself with applicable Title 24 standards will ensure that the project energy demands would not be inefficient, wasteful, or otherwise unnecessary.

Impact Analysis

a. *Less Than Significant Impact* – As supported by the preceding analyses, project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. The project would therefore not cause or result in the need for additional energy producing or transmission facilities. The project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California, as such, impacts under this issue would be less than significant.

b. *Less Than Significant Impact* – The project's consistency with the applicable state and local plans is discussed below.

Consistency with Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)
Transportation and access to the project site is provided by the local and regional roadway systems. The project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because Southern California Association of Governments is not planning for intermodal facilities on or through the project site.

Consistency with the Transportation Equity Act for the 21st Century (TEA-21)
The project site is located near major transportation corridors with proximate access to the Interstate freeway system. The site selected for the project facilitates access and acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The project supports the strong planning processes emphasized under TEA-21. The project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21.

Consistency with Integrated Energy Policy Report (IEPR)
Electricity may be provided to the project by SCE. SCE's Clean Power and Electrification Pathway white paper builds on existing state programs and policies. As such, the project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2020 IEPR.

Consistency with State of California Energy Plan
The project site is located proximate to transportation corridors with access to the Interstate freeway system. The site selected for the project is infill and facilitates access and takes advantage of existing infrastructure systems. The project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.

Consistency with California Code Title 24, Part 6, Energy Efficiency Standards
The 2019 version of Title 24 was adopted by the California Energy Commission (CEC) and became effective on January 1, 2020. It should be noted that the analysis herein assumes compliance with the 2019 Title 24 Standards. It should be noted that according to the CEC non-residential buildings and residential buildings over four stories high are approximately 30% more energy efficient.

Consistency with AB 1493 (Pavley Regulations and Fuel Efficiency Standards)
AB 1493 is not applicable to the project as it is a statewide measure establishing vehicle emissions standards. No feature of the project would interfere with implementation of the requirements under AB 1493.

Consistency with California's Renewable Portfolio Standard (RPS)
California's Renewable Portfolio Standard is not applicable to the project as it is a statewide measure that establishes a renewable energy mix. No feature of the project would interfere with implementation of the requirements under RPS.

Consistency with the Clean Energy and Pollution Reduction Act of 2015 (SB 350)
The proposed project would use energy from SCE, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. No feature of the project would interfere with implementation of SB 350. Additionally, the project would be designed and constructed to implement the energy efficiency measures for new residential developments and would include several measures designed to reduce energy consumption.

Conclusion
As shown above, the project would not conflict with any of the state or local plans. As such, the proposed project would have a less than significant potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VII. GEOLOGY AND SOILS: Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
(ii) Strong seismic ground shaking?	☐	☒	☐	☐
(iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
(iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite land-slide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

SUBSTANTIATION: The analysis provided in this subsection is supported by a "*Preliminary Geotechnical Evaluation and Recommendations, Proposed Multi- Family Residential Development Located at the Intersection of Philadelphia Street and Comstock Avenue, Whittier, California*" prepared by LGC Geotechnical, Inc. dated May 17 2021. This report is provided as Appendix 9 to this document.

a. i. Ground Rupture

Less Than Significant Impact – The proposed project is located in the Uptown area of the City of Whittier, which is set back from the Puente Hills. Many active faults run through the Puente Hills, however, none are delineated as Alquist Priolo Fault Zones. Figure VII-1 depicts the locations of the Alquist-Priolo Fault Traces and Hazard Zones as prepared by the California Geologic Survey within the vicinity of the project. According to Figure VII-1, the site is not located on an active fault or within the nearest Alquist-Priolo fault zone. The Alquist-Priolo fault zones are approximately 3 miles to the

east of the project site. There is a potential for the proposed development to be subject to relatively strong ground motion. However, based on this information, the risk for ground rupture at the site location is low; therefore, it is not likely that future residents of the Comstock Multi-Family Project would be subject to seismic hazards from rupture of a known earthquake fault. Furthermore, the project will demolish existing facilities and construct updated facilities that would be constructed to meet current California Building Code, which includes enhanced seismic safety standards. Therefore, any impacts under this issue are considered less than significant; no mitigation is required.

ii. Strong Seismic Ground Shaking

Less Than Significant With Mitigation Incorporated – As stated in the discussion above, several faults run through the southern California region in which the proposed project is located. According to the Envision Whittier General Plan Local Seismic Hazards and Earthquake Faults, Figure VII-2 shows the Elsinore Fault Zone. Additionally, according to the Preliminary Geotechnical Investigation provided as Appendix 9 to this document, some of the other major active nearby faults in the area include the Whittier, Puente Hills, Compton, Elysian Park, and Anaheim Fault Zones, among others. Like all other development projects in the City and throughout the Southern California Region, the proposed project will be required to comply with all applicable seismic design standards contained in the 2019 California Building Code (CBC), including Section 1613 Earthquake Loads. Compliance with the CBC can ensure that structural integrity will be maintained in the event of an earthquake. Additionally, given the strong potential for groundshaking at the site, the following mitigation measure shall be implemented to ensure that the seismic design values outlined in the Preliminary Geotechnical Investigation are incorporated into the final design for the proposed structures of the Comstock Multi-Family Project.

GEO-1 Based upon the preliminary geotechnical investigation, all of the recommended seismic design parameters identified shall be implemented by the Applicant. Implementation of these specific measures will address all of the identified geotechnical constraints identified at project site, including seismic soil stability on future project-related structures.

Therefore, impacts associated with strong ground shaking will be less than significant with mitigation.

iii. Seismic-related Ground Failure Including Liquefaction

No Impact – Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. Liquefaction occurs when three general conditions coexist: 1) shallow groundwater; 2) low density non- cohesive (granular) soils; and 3) high-intensity ground motion. The proposed project is located on an entirely developed lot that will not require extensive excavation to complete. According to the Envision Whittier General Plan Local Seismic Hazards and Earthquake Faults (Figure VII-2), seismically induced liquefaction is generally limited to the northeastern and southwestern portions of the City, and is not mapped as having the potential to occur within the project site or Uptown area. Furthermore, the Preliminary Geotechnical Investigation prepared for the proposed project indicates that due to the absence of groundwater and the presence of very stiff fine-grained soils in the upper 50 feet of soils at the project site, the potential for liquefaction is considered very low to remote. Therefore, the project will not expose people or structures to potential substantial adverse liquefaction hazards, including the risk of loss, injury, or death involving landslides. No impacts under this issue are anticipated and no mitigation is required. No mitigation is required.

iv. Landslides

No Impact – According to the Envision Whittier General Plan Local Seismic Hazards and Earthquake Faults (Figure VII-2), seismically induced landslide occurs generally near, and in the Puente Hills, and as the proposed project is located in the Uptown area of the City of Whittier, which is about 1 mile

to the west of the Puente Hills, the proposed project site is not located in an area with any known earthquake induced landslide hazards. Based on a site reconnaissance the project site is essentially flat as it contains existing development. Therefore, the project will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impacts under this issue are anticipated and no mitigation is required.

b. *Less Than Significant With Mitigation Incorporated* – The potential for soil erosion, loss of topsoil, and/or placing structures on unstable soils is anticipated to be marginally possible at the site during ground disturbance associated with construction. The project site is essentially flat with some pavement, one building, and non-native vegetation coverage. City grading standards, best management practices, and the Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP) are required to control the potential significant erosion hazards.

During project construction when soils are exposed, temporary soil erosion could occur, which could be exacerbated by rainfall. Project grading and potential runoff would be managed through the preparation and implementation of a SWPPP during construction, and will be required to implement best management practices to achieve concurrent water quality controls after construction is completed and the Comstock Multi-Family Project is constructed and occupied. The following mitigation measures or equivalent best management practices (BMPs) shall be implemented to address the potential erosion hazards:

GEO-2 Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. If covering is not feasible, then measures such as the use of straw bales or sandbags shall be used to capture and hold eroded material on the project site for future cleanup such that erosion does not occur.

GEO-3 All exposed, disturbed soil (trenches, stored backfill, etc.) shall be sprayed with water or soil binders twice a day, or more frequently if fugitive dust is observed migrating from the site within which the Comstock Multi-Family Project is being constructed.

With implementation of the above mitigation measures, as well as MM **GEO-1**, and the mandatory erosion control measures incorporated in the site design (i.e., retaining walls and extensive compacted fill), the project will not result in substantial soil erosion or the loss of topsoil. No further mitigation is necessary.

c. *Less Than Significant With Mitigation Incorporated* – Refer to the discussion under VII(a), above. Potential instability associated with slope stability related to the project was determined to be less than significant as the site and surrounding area are essentially flat. Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region, which may affect the site, include ground lurching, shallow ground rupture, soil liquefaction and dynamic settlement. According to the Preliminary Geotechnical Investigation (pages 9-10), liquefaction and dynamic settlement potential were determined to be very low to remote at the project site (refer to Appendix 9). Furthermore, the Preliminary Geotechnical Investigation identified several recommendations for site construction that will ensure that the proposed project is constructed to address the geotechnical constraints at the project site, including subsidence recommendations, which are addressed on page 17 (Appendix 9). These conclusions and recommendations shall be implemented through the following mitigation measure.

GEO-4 Based upon the Preliminary Geotechnical Investigation, all of the recommended design parameters shall be implemented by the Applicant. Implementation of these specific measures will address all of the identified geotechnical constraints identified at project site, including subsidence

According to the Geotechnical Investigation, the undocumented artificial fill soils consisted of variable amounts of sand, silt, clay, and gravel, that is brown to grayish brown, slightly moist to moist, and loose to very stiff up to approximately 5 feet below existing grade. The native alluvial soils consisted of primarily silt with varying amounts of sand and clay, that is brown to dark brown, dry to moist, and very stiff too hard for fine-grained soils and medium dense for coarse-grained soils. The near-surface loose and compressible soils are not suitable for the planned improvements in their present condition, and as such must comply with the recommendations outlined in MM **GEO-4**, above, to ensure that proper fill soil is imported or provided to develop the site. Thus, with the above mitigation measure, the project will not have a significant potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse. Any impacts are considered less than significant with mitigation.

d. *Less Than Significant With Mitigation Incorporated* – The Preliminary Geotechnical Investigation concluded that the underlying soil/bedrock at the site possess low to medium expansive characteristics. The expansion potential of these materials is not considered to pose a hazard for the proposed site development. However, the final expansion potential of site soils will be determined at the completion of grading. Results of expansion testing at finish grades will be utilized to confirm final foundation design through the implementation of MMs **GEO-1** and **GEO-4**, which are intended to ensure that the recommendations provided in the Preliminary Geotechnical Investigation are implemented. Therefore, the development of the Comstock Multi-Family Project at this site will have a less than significant potential to create a substantial risk to life or property by being placed on expansive soils because none exist on the site. Any impacts are considered less than significant with the implementation of mitigation identified above.

e. *No Impact* – The project does not propose any septic tanks or alternative wastewater disposal systems. Therefore, determining if the project site soils are capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater does not apply. No impacts are anticipated. No mitigation is required.

f. *Less Than Significant With Mitigation Incorporated* – The potential for discovering paleontological resources during development of the project is considered highly unlikely based on the fact that the site has been previously engineered and disturbed at depth. No unique geologic features are known or suspected to occur on or beneath the site. However, because these resources are located beneath the surface and can only be discovered as a result of ground disturbance activities, the following measure shall be implemented:

GEO-5 Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the City's onsite inspector. The paleontological professional shall assess the find, determine its significance, and determine appropriate mitigation measures within the guidelines of the California Environmental Quality Act that shall be implemented to minimize any impacts to a paleontological resource.

With incorporation of this contingency mitigation measure, the potential for impact to paleontological resources will be reduces to a less than significant level. No additional mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VIII. GREENHOUSE GAS EMISSIONS: Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

SUBSTANTIATION: A Greenhouse Gas Analysis (GHGA) was prepared for the proposed project. It is provided as Appendix 10 to this Initial Study and is titled "Whittier Residential, Greenhouse Gas Analysis, City of Whittier" prepared by Urban Crossroads dated June 21, 2022.

Climate Change Setting

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The majority of scientists also believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

An individual project like the proposed project evaluated in this GHGA cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC.

Greenhouse Gases and Health Effects

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. The potential health effects related directly to the emissions of CO_2, CH_4, and N_2O as they relate to development projects such as the proposed project are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change will likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas.

Global Warming Potential

GHGs have varying Global Warming Potential (GWP) values. GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO2 is utilized as the reference gas for GWP, and thus has a GWP of 1. Carbon dioxide equivalent (CO2e) is a term used for describing the difference GHGs in a common unit. CO_2e signifies the amount of CO2 which would have the equivalent GWP.

GWP for the Second Assessment Report, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for CO_2 to 23,900 for SF_6 and GWP for the IPCC's 5th Assessment Report range from 1 for CO_2 to 23,500 for SF6.

Greenhouse Gas Emissions Inventories

State of California: California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the U.S. emissions inventory total. The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2020 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2018 In 2018, emissions from GHG emitting activities statewide were 425 million metric tons of carbon dioxide equivalent (MMT CO2e), 0.8 MMT CO_2e higher than 2017 levels and 6 MMT CO2e below the 2020 GHG Limit of 431 MMT CO2e. (MMT CO_2e/yr)

Significance Thresholds
The City of Whittier has not adopted its own numeric threshold of significance for determining impacts with respect to greenhouse gas (GHG) emissions. A screening threshold of 3,000 MT CO2e per year to determine if additional analysis is required is an acceptable approach for small projects. This approach is a widely accepted screening threshold used by numerous cities in the South Coast Air Basin and is based on the South Coast Air Quality Management District (SCAQMD) staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required. As noted by the SCAQMD:

"…the…screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects...the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than one percent of future 2050 statewide GHG emissions target (85 [MMT CO2e/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."

Thus, and based on guidance from the SCAQMD, if a non-industrial project would emit GHGs less than 3,000 MT CO2e per year, the project is not considered a substantial GHG emitter and the GHG impact is less than significant, requiring no additional analysis and no mitigation. On the other hand, if a non-industrial project would emit GHGs in excess of 3,000 MT CO2e per year, then the project could be considered a substantial GHG emitter, requiring additional analysis and potential mitigation.

As previously discussed, a screening threshold of 3,000 MT CO_2e per year is an acceptable approach for small projects to determine if additional analysis is required and is therefore applied to this project.

Impact Analysis

a. *Less Than Significant Impact* – GHG emissions associated with the proposed project would occur during both construction (short-term) and operations (long-term).

Construction Emissions

Project construction activities would generate CO_2 and CH_4 emissions The AQIA provided as Appendix 5 contains detailed information regarding project construction activities. Construction related emissions are expected from the following activities:

- Demolition
- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

Construction Duration

Construction is expected to commence in November 2022 and will continue through April 2023. The construction schedule utilized in the analysis, shown in Table VIII-1, represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.[4] The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines. The duration of construction activities was based on CalEEMod defaults and an opening year of 2023.

Table VIII-1
CONSTRUCTION DURATION

Phase Name	Start Date	End Date	Days
Demolition	11/1/2022	11/14/2022	10
Site Preparation	11/15/2022	11/15/2022	1
Grading	11/16/2022	11/17/2022	2
Building Construction	11/18/2022	4/6/2023	100
Paving	3/31/2023	4/6/2023	5
Architectural Coating	3/31/2023	4/6/2023	5

Construction Equipment

Site specific construction fleet may vary due to specific project needs at the time of construction. The construction equipment estimates are generally based on CalEEMod standard inputs. A modification to the default equipment list was made to allow the model to more accurately calculate fugitive dust from ground disturbance for purposes of the air quality localized significance threshold. As CalEEmod does not calculate ground disturbance for the Tractors/Loaders/Backhoes equipment, these were replaced with crawler tractors with the same horse power and load factors of the Tractors/Loaders/ Backhoes equipment. A detailed summary of construction equipment assumptions by phase is provided at Table VIII-2. Please refer to specific detailed modeling inputs/outputs contained in Appendix 3.1 of the GHGA.

Construction Emissions Summary

To evaluate project construction emissions, GHG emissions are quantified and amortized over the life of the project and added to the operations emissions. To amortize the emissions over the life of the project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life then adding that number to the annual operational GHG emissions. Therefore, project construction emissions have been amortized over a 30-year period and

[4] As shown in the CalEEMod User's Guide Version 2016.3.2, Section 4.3 "Offroad Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

added to the annual operational GHG emissions. The amortized construction emissions are presented in Table VIII-3.

Table VIII-2
CONSTRUCTION EQUIPMENT ASSUMPTIONS

Phase Name	Equipment	Amount	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Rubber Tired Dozers	1	8
	Tractors/Loaders/Backhoes	2	8
Site Preparation	Crawler Tractors (T/L/B)	1	8
	Graders	1	8
Grading	Crawler Tractors (T/L/B)	1	8
	Graders	1	8
	Rubber Tired Dozers	1	8
Building Construction	Cranes	1	8
	Forklifts	2	8
	Tractors/Loaders/Backhoes	2	8
Paving	Cement and Mortar Mixers	4	8
	Pavers	1	8
	Rollers	1	8
	Tractors/Loaders/Backhoes	1	8
Architectural Coating	Air Compressors	1	8

T/L/B = Tractors, Loaders, Backhoes; E = Excavators

Table VIII-3
AMORTIZED ANNUAL CONSTRUCTION EMISSIONS

Year	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
2022	42.08	0.01	0.00	42.58
2023	64.56	0.02	0.00	65.21
Total Annual Construction Emissions	106.64	0.03	0.00	107.79
Amortized Construction Emissions ($MTCO_2e$)	**3.55**	**0.00**	**0.00**	**3.59**
Source: CalEEMod, Appendix 3.1 of the GHGA				

Operational Emissions

Operational activities associated with the proposed project will result in emissions of CO_2, CH_4, and N_2O from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions
- Water Supply, Treatment, and Distribution
- Solid Waste

Area Source Emissions
Landscape maintenance equipment are typically the only area sources that would generate GHG emissions, which are primarily due to fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the project. The emissions associated with landscape maintenance equipment were calculated based on standard assumptions included in CalEEMod.

Energy Source Emissions
Combustion Emissions Associated with Natural Gas and Electricity: GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting[5]. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are indirect emissions. Unless otherwise noted, CalEEMod default parameters were used.

Renewable Portfolio Standard: Indirect emissions from electricity use were modeled based on electricity intensity factors for the project utility provider, Southern California Edison (SCE). CalEEMOD derives energy intensity factors from 2019 data, which indicates that in 2019 SCE generated 393 pounds of CO_2e for each megawatt-hour (MWh) of electricity delivered. SCE had a power mix with 38% renewables in 2019 and is projected to meet the 44% renewables requirement by 2024. The 2019 reported energy intensity factors were used in this analysis of GHG emissions.

Title 24 Energy Efficiency Standards: California's Energy Efficiency Standards for Residential and Nonresidential Buildings was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020. The 2019 Energy Code is used in this analysis.

Mobile Source Emissions
Project mobile source GHG impacts are dependent on both overall daily vehicle trip generation and the effect of the project on peak hour traffic volumes and traffic operations in the vicinity of the project. The project-related GHG impacts are derived primarily from vehicle trips generated by the project. Trip characteristics available from the Traffic Impact Analysis (TIA) report were utilized in this analysis

Water Supply, Treatment, and Distribution
Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat and distribute water depends on the volume of water as well as the sources of the water. CalEEMod default end use water demand rates are based on 2000 water demand data. Since 2013 CalGreen has required a 20% reduction in indoor water use over base line rates. This was implemented through design requirements in the code for water closets, faucets and other plumbing fixtures to achieve the 20% decrease by decreasing the flow rates by 20%. Therefore, CalEEMod default parameters were modified to reflect this post 2000 requirement.

Solid Waste
Residential land uses will result in the generation and disposal of solid waste. A large percentage of this waste will be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material.

[5] The CalEEMod emissions inventory model does not include indirect emission related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of street lighting that would occur.

GHG emissions associated with the disposal of solid waste associated with the proposed project were calculated by CalEEMod using standard generation rates.

Emissions Summary
The annual GHG emissions associated with the operation of the proposed project without mitigation are estimated to be approximately 377.42 CO_2e/yr as summarized in Table VIII-4.

Table VIII-4
PROJECT GHG EMISSIONS

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Annual construction-related emissions amortized over 30 years	3.55	0.00	0.00	3.59
Area	12.11	0.00	0.00	12.20
Energy	71.76	0.00	0.00	72.16
Mobile	259.40	0.02	0.01	263.23
Waste	4.86	0.29	0.00	12.03
Water Use	11.33	0.09	0.00	14.21
Total CO_2e (All Sources)	**377.42**			
SCAQMD Threshold	**3,000**			
Significant?	**No**			

Source: CalEEMod, Appendix 3.1 of the GHGA
-- = Emission factor only provided in MT CO_2e

Emissions Summary
The annual GHG emissions associated with the operation of the proposed project are estimated to be 377.42MT $CO2_e$ per year as summarized in Table VIII-4. Direct and indirect operational emissions associated with the project are compared with the SCAQMD threshold of significance for small land use projects, which is 3,000 MT $CO2_e$ per year. As shown, the proposed project would result in a less than significant impact with respect to GHG emissions.

b. *Less Than Significant Impact* – As previously stated, pursuant to 15604.4 of the *CEQA Guidelines*, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the project's consistency with SB 32 (2017 Scoping Plan), is discussed below. Consistency with AB 32 and the 2008 Scoping Plan is not necessary, since the target year for AB 32 and the 2008 Scoping Plan was 2020, and the project's buildout year for modeling is 2023. As such the 2017 Scoping Plan is the most relevant statewide plan. Project consistency with SB 32 is evaluated in the following discussion.

SB 32/2017 Scoping Plan Consistency
The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Table VIII-5 summarizes the project's consistency with the 2017 Scoping Plan. As summarized, the project will not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories.

Table VIII-5
2017 SCOPING PLAN CONSISTENCY SUMMARY

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	Consistent. This measure is not directly applicable to development projects, but the proposed project would use energy from Southern California Edison, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. Additionally, as the project buildings are less than 4-stories, they would be required to install solar PV systems to increase renewable energy availability for the project.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		Consistent. Although this measure is directed towards policymakers, the proposed project would be designed consistent with Title 24 2019, which increases in overall energy efficiency from Title 24 2016.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		Not applicable. This measure is not within the purview of this project.
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	No conflict. These are CARB enforced standards; vehicles that access the project that are required to comply with the standards will comply with the strategy.
At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.		No conflict. These are CARB enforced standards; vehicles that access the project that are required to comply with the standards will comply with the strategy.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		No conflict. These are CARB enforced standards; vehicles that access the project that are required to comply with the standards will comply with the strategy.
Medium- and Heavy-Duty GHG Phase 2.		No conflict. These are CARB enforced standards; vehicles that access the project that are required to comply with the standards will comply with the strategy.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_X standard.		Not applicable. This measure is not within the purview of this project.

Action	Responsible Parties	Consistency
Last Mile Delivery: New regulation that would result in the use of low NO_X or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		Not applicable. This project is not responsible for implementation of SB 375 and would therefore not conflict with this measure.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		No conflict. This project is not responsible for implementation of SB 375 and would therefore not conflict with this measure. However, the project does result in net negative tip generation in the [Keywords] as the project would generate fewer trips than the previous land use.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Not applicable. The project is not within the purview of SB 375 and would therefore not conflict with this measure.
By 2019, adjust performance measures used to select and design transportation facilities		
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GO Biz), California Infrastructure and Economic Development Bank, Department of Finance, California Transportation Commission (CTC), Caltrans	Not applicable. Although this is directed towards CARB and Caltrans, the proposed project would be designed to promote and support pedestrian activity on-site and in the project site area.
By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	Not applicable. Although this measure is directed towards policymakers, the proposed project would comply with AB 939, which sets a statewide policy that not less than 65% of solid waste generated be source reduced, recycled, or composted. Additionally, the proposed project would be required to participate in the City of Whittier recycling program and recycling collection. During construction, the proposed project shall recycle and reuse construction and demolition waste per City of Whittier solid waste procedures.

Action	Responsible Parties	Consistency
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	Not applicable. This measure is not within the purview of this project.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		Not applicable. This measure is not within the purview of this project.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	No conflict. This measure would apply to all fuel purchased and used by the project in the state.
Implement the Short-Lived Climate Pollutant Strategy by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	Not applicable. This measure is not within the purview of this project.
50% reduction in black carbon emissions below 2013 levels.		Not applicable. This measure is not within the purview of this project.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA SWRCB, Local Air Districts	Not applicable. This measure is not within the purview of this project.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	Not applicable. This measure is not within the purview of this project.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	Not applicable. This measure is not within the purview of this project.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity		Not applicable. This measure is not within the purview of this project.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		Not applicable. This measure is not within the purview of this project.
Establish scenario projections to serve as the foundation for the Implementation Plan		Not applicable. This measure is not within the purview of this project.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	Not applicable. This measure is not within the purview of this project.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection, CalEPA and Departments Within	Not applicable. This measure is not within the purview of this project.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Not applicable. This measure is not within the purview of this project.

As shown above, the project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the project. Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40% below 1990 levels by 2030.

Conclusion

As shown, the project does not directly conflict with any applicable plans or policies adopted for the purpose of reducing GHG emissions. Additionally, the project would not exceed the SCAQMD threshold of 3,000 MT CO_2e. Therefore, project-related emissions would be less than significant relative to GHG reduction plans.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

SUBSTANTIATION: The analysis provided in this subsection is supported by a "*Phase I Environmental Site Assessment Report*" prepared by PIC Environmental Services dated January 26, 2021. This report is provided as Appendix 11a to this document. A follow-on Phase II report was prepared and is titled *Phase II Environmental Site Assessment Report*" and dated March 17, 2021. This report is provided as Appendix 11b to this document.

Background

In 1912, the site served as a gas station. The existing building was constructed in 1952. Historic use of the property as a former gasoline station could have caused subsurface contamination from the release of gasoline and other petroleum compounds. The former laundry at the project site that inhabited the project site in the late 1800s was demolished prior to the manufacturing of perchloroethene (PCE), and as such its past presence does not warrant further subsurface testing. However, the former gasoline station warrants a precautionary Subsurface Phase II Investigation. Asbestos containing construction materials (ACMs) may be present at the existing structure onsite, as the structure was constructed prior to 1980; however, hazardous waste disposal records indicate that much of the ACMs were removed in 1996.

The Phase II was prepared and the consultant—PIC—recommended and drilled a total of 3 borings where the former gasoline service station facilities was located. A total of four soil samples and three soils gas samples were recovered at depths of 5 to 10 feet. The laboratory results document a lack of detectable petroleum or solvents contamination in all soil and gas samples. All measured concentrations were well below the screening guidelines adopted by the Federal Environmental Protection Agency (EPA), the California Regional Water Quality Control Board, and the California Department of Toxic Substances Control.

Impact Analysis

a&b. *Less Than Significant With Mitigation Incorporated* – The project may create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or may create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. During construction of the proposed Comstock Multi-Family Project, there are activities that can expose the public to significant hazards from accidental circumstances. The first pathway occurs when petroleum products are accidentally released from construction equipment or storage facilities. For example, vandalism can cause a release from stored fuels, or a hydraulic hose may break on a large piece of construction equipment. This type of impact is readily mitigated by immediately stopping the construction activity; controlling the accidental release; and carrying out remediation of the area contaminated by the spill. The following mitigation measure addresses this circumstance, and with implementation of this measure, no residual contamination will remain.

HAZ-1 ***Prior to and during grading and construction, should an accidental release of a hazardous material occur, the following actions will be implemented: construction activities in the immediate area will be immediately stopped; appropriate regulatory agencies will be notified; immediate actions will be implemented to limit the volume and area impacted by the contaminant; the contaminated material, primarily soil, shall be collected and removed to a location where it can be treated or disposed of in accordance with the regulations in place at the time of the event; any transport of hazardous waste from the property shall be carried out by a registered hazardous waste transporter; and testing shall be conducted to verify that any residual concentrations of the accidentally released material are below the regulatory remediation goal at the time of the event. All of the above sampling or remediation activities related to the contamination will be conducted under the oversight of Los Angeles County Certified Unified Program Agency (CUPA) Site Mitigation Unit (SMU). All of the above actions shall be documented and made available to the appropriate regulatory agencies prior to closure (a determination of the regulatory agency that a site has been remediated to a threshold that poses no hazard to humans) of the contaminated area.***

Furthermore, as discussed under the Background discussion above, the Phase II report concluded that the project is unlikely to encounter soil contamination, as the areas in which the gas station operated within the site was sampled for evidence of petroleum contamination in the soils and none was found to exceed current significance thresholds. As such, it is unlikely that accidental uncovering of hazardous materials as a result of development at the project site will occur.

Roadways adjacent to the project site are public roads that can be used by any common carrier to or from the local area. For such transporters, the existing regulatory mandates ensure that the hazardous materials and any hazardous wastes transported to and from the project site will be properly managed. These regulations are codified in Titles 8, 22, and 26 of the California Code of Regulations. For example, maintenance trucks for construction equipment must transport their hazardous materials in appropriate containers, such as tanks or other storage devices. In addition, the haulers must comply with all existing applicable federal, state and local laws and regulations

regarding transport, use, disposal, handling and storage of hazardous wastes and material, including storage, collection and disposal. Compliance with these laws and regulations related to transportation will minimize potential exposure of humans or the environment to significant hazards from transport of such materials and wastes.

Since the proposed project involves the demolition of the existing structure on site, which may contain asbestos or lead based paint, appropriate abatement of identified chemicals is necessary prior to demolition. Federal and State regulations govern the demolition of structures where materials containing lead and asbestos are present. Asbestos-containing materials (ACMs) are regulated both as a hazardous air pollutant under the Clean Air Act and as a potential worker safety hazard under the authority of Cal/OSHA. These requirements include SCAQMD Rules and Regulations pertaining to asbestos abatement (including Rule 1403); Construction Safety Orders 1529 (pertaining to asbestos) and 1532.1 (pertaining to lead) from CCR Title 8; CFR Title 40, Part 61, Subpart M (pertaining to asbestos); and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD). Asbestos and lead abatement must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services.

Operation of the proposed Comstock Multi-Family Project consists of 52 apartment units; operation of such uses would not involve the use of a substantial amount of hazardous materials. Household cleaning supplies would be used in small quantities to support the apartments, which the City's GPEIR does not identify as capable of generating significant hazardous emissions or involve the use of acutely hazardous materials that could pose a significant threat to the environment. Compliance with all federal, State, and local regulations governing the storage and use of hazardous materials is required, and will ensure that the project operates in a manner that poses no substantial hazards to the public or the environment. No further mitigation is required.

c. *Less Than Significant Impact* – The project site is located less than one-quarter mile from any public school. The proposed project is located in close proximity to several private schools. About 1,000 feet to the southwest is Saint Mary's Catholic School, while Whittier Christian School is located less than 1,000 feet to the north of the project site, and about one quarter mile to the east of the project site is the Whittier Friends School. Based on the information contained in the Phase I and II Assessments, it is unlikely that the proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The proposed project is not anticipated to emit hazardous emissions as discussed under issue IX(a&b), above, as it is a project that would develop a multi-family residential complex with no potential for use of substantial amounts of hazardous materials. Furthermore, the City's GPEIR indicates that hazardous materials associated with new residential use would be used in such limited quantity that its use would not generate significant hazardous air emissions or involve the use of acutely hazardous materials that could pose a significant threat to the environment or human health. Based on this information, implementation of the project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Less than significant adverse impacts are anticipated under this topic.

d. *Less Than Significant Impact* – The proposed project consists of a previously developed site containing a parking lot and an office structure surrounded by existing urban development. The project will not be located on a site that is included on a list of hazardous materials sites that are currently under remediation. According to the California State Water Board's GeoTracker website (consistent with Government Code Section 65962.5), which provides information regarding Leaking Underground Storage Tanks (LUST) and other types of clean-up sites, there are no open LUST, Cleanup Program, Military, or Department of Toxic Substances Control (DTSC) clean-up sites within 1,000 feet of the project site (Figure IX-1). There are two cleanup sites that have been remediated, and are no longer considered hazardous to the environment and as such would not impact development at this site. The Envision Whittier General Plan map showing Hazardous Waste Generators (Figure IX-2) indicates that there is a hazardous waste generator in close proximity to the

project site, however the safe operations of this site are permitted, and must comply with federal, State, and local regulations governing the storage and use of hazardous materials, and as such would not pose a hazard to the occupancy of the project site by future residents of The Comstock Project. Therefore, the proposed construction and operation of the site as the Comstock Multi-Family Project will not create a significant hazard to the population or to the environment from their implementation. No mitigation is required.

e. *No Impact* – The project site is not located within two miles of an airport or private airstrip. The El Monte Airport is located approximately 6.9 miles north of the center of the City, and Fullerton Airport is located approximately 8.5 miles southeast of the City. The City does not fall within the Planning Boundary/Airport Influence Area for either airport. As such, development of the proposed project at the proposed site location would have no potential to result in a safety hazard or excessive noise for people residing or working in the project area as a result of proximity to an airport or private airstrip. No impacts are anticipated and no mitigation is required.

f. *Less Than Significant Impact* – According to the City's GPEIR, the Whittier Natural Hazards Mitigation Plan specifies all major public streets serve as principal evacuation routes including Whittier Boulevard, Lambert Road, Santa Fe Springs Road, La Mirada Boulevard/Colima Road, Norwalk Boulevard, Beverly Boulevard, and Interstate 605 (I-605). The proposed project will occur within the project site and is not anticipated to impact surrounding roadways. The project site is located adjacent to Philadelphia Street and Comstock Avenue, which have not been designated as evacuation routes by the City's GPEIR. It is not anticipated that development of the project site would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan because the site activities will be confined within the proposed project site. The proposed construction staging plan and the onsite parking and circulation plans will be reviewed by the local Fire Department and City Engineering Department to ensure that the project's ingress/egress are adequate for accommodating emergency vehicles. Therefore, there is no potential for the development of the project to physically interfere with any adopted emergency response plans, or evacuation plans. No impacts are anticipated and no mitigation is required.

g. *No Impact* – According to the Envision Whittier General Plan Wildfire Hazards map (Figure IX-3), the proposed project is not located in a high fire hazard zone. Given the proposed project's location removed from the Puente Hills where the high and very high fire hazard severity zones are located, project implementation would not result and a potential to expose people or structures to fire hazards. No impacts are anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
X. HYDROLOGY AND WATER QUALITY: Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation onsite or offsite?	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?	☐	☐	☒	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?; or,	☐	☒	☐	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

SUBSTANTIATION

a. *Less Than Significant With Mitigation Incorporated* – The proposed project is located within the planning area of the Los Angeles Regional Water Quality Control Board (RWQCB). The project would be supplied with water by City of Whittier Water Department that uses water supplied from local groundwater basins, and recycled water provided by Central Basin Municipal Water District (CBMWD) for landscape irrigation purposes.

For a developed area, the only three sources of potential violation of water quality standards or waste discharge requirements are from generation of municipal wastewater, stormwater runoff, and potential discharges of pollutants, such as accidental spills. Municipal wastewater is delivered to the Sanitation Districts of Los Angeles County (LACSD) through City of Whittier owned, operated, and maintained wastewater collection system. The LACSD and City of Whittier are required to comply with water quality and waste discharge requirements. Additionally, the Los Angeles County Flood Control District (LACFCD) operates the storm drain system. Stormwater discharges to the Pacific Ocean via the San Gabriel River, which is impaired by pollutants according to the City's GPEIR.

To address stormwater and accidental spills within this environment, any new project must ensure that site development implements an SWPPP/National Pollutant Discharge Elimination System (NPDES) plan to control potential sources of water pollution that could violate any standards or discharge requirements during construction and a Water Quality Management Plan to ensure that project-related after development surface runoff meets discharge requirements over the short- and long-term. The WQMP would specify stormwater runoff permit BMP requirements for capturing, retaining, and treating on site stormwater runoff once the apartment units have been occupied. The project would be located within a developed site, and while it will contain landscaping, much of the project site will be covered with developed or paved impervious surfaces. As such, onsite drainage will be managed through biofiltration planters on the southern and western boundaries of the site (shown in Appendix 1a, the Project Plans). The SWPPP would specify the BMPs that the project would be required to implement during construction activities to ensure that all potential water pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Furthermore, the City's GPEIR considers that the City's development review process, which requires preparation of SWPPPs for short-term water quality management for individual project construction, as well as WQMPs for long-term water quality management for project operation before any grading permits are issued would minimize impacts under this issue from future development. With implementation of these mandatory Plans and their BMPs, as well as MM **HAZ-1** above, the development of Comstock Multi-Family Project will not cause a violation of any water quality standards or waste discharge requirements.

b. *Less Than Significant Impact* – Implementation of the proposed project will not deplete groundwater supplies that would substantially affect the water availability for existing or planned land uses or biological resources. It is anticipated that, based on the Preliminary Geotechnical Investigation provided as Appendix 9, the depth to groundwater is anticipated to be greater than 100 feet below the ground surface (bgs) as groundwater was not encountered during the subsurface evaluation performed at the project site. Therefore, given that the project does not require extensive excavation, the potential to intercept groundwater during ground disturbing activities at the project site is considered to be less than significant. The design of the drainage facilities of the proposed project would encourage groundwater recharge through biofiltration planters on the southern and western boundaries of the site (shown in Appendix 1a, the Project Plans). Regardless, given that the project site is entirely developed with a parking lot and office structure, as well as supporting landscaping, and that the proposed project would result in a similar amount of impervious surface to the existing environmental setting, the groundwater basin would not experience substantial physical alteration or impact as a result of the proposed project

The Comstock Multi-Family Project is a multi-family residential project that will consist of 52 dwelling units. The project would be supplied with water by the City of Whittier that uses groundwater and other sources to meet primary customer demand. The City has provided the Applicant with a will service letter indicating that the City of Whittier Water Department has the resources to serve this project (refer to Appendix 14, which consists of a compilation of all Utility will-serve letters). The City's Urban Water Management Plan (2020) identifies sufficient water resources to meet demand in its service area. The total supply for City in 2019-2020 was 6,906 acre-feet (AF). This included groundwater from the Main San Gabriel Basin and the Central Basin in the total amount of 6,848 AF, with an additional supply of recycled water in the amount of 58 AF. The demand was 6,906 AF. According to the City, multi-family uses accounted for 1,684 AF of the overall water demand in 2020. Based on data compiled by the Southern California Association of Governments (SCAG)[6], in 2018 there were approximately 9,090 multi-family units, which indicates that each dwelling unit requires about 0.185 AFY per dwelling unit. Therefore, it can be assumed that this project, which would contribute an additional 52 dwelling units, would demand about 9.63 AF per year (AFY, 0.185 AFY x 52 units = 9.63 AFY). Based on the projected water demand for multi-family residential uses within the City's service area for 2025, 1,758 AFY, and for 2045, 1,919 AFY, it is anticipated that the 9.93 AFY demand can be accommodated into the future, particularly given that the overall available water

[6] https://scag.ca.gov/sites/main/files/file-attachments/whittier_localprofile.pdf?1606011132

supply is anticipated to meet demand. These data indicate that the City has available capacity to serve the proposed project without significant adverse impacts on area groundwater basins. The City GPEIR provides MM **UTIL-1**, which prevents future development from occurring where the development would demand water in excess of what is identified for supply in 2040 under the most recent UWMP. Furthermore, as stated above, the proposed project would not significantly decrease impervious area on site from that which occurs at the site at present, and in fact may enhance percolation. The development of the project will, therefore, not substantially interrupt the existing percolation of the site, or any flow of groundwater under the project site. No significant adverse impacts to groundwater resources are forecast to occur from implementing the proposed project. No mitigation is required.

c i. Result in substantial erosion or siltation onsite or offsite?

Less Than Significant Impact – The proposed project is not anticipated to significantly change the volume of flows downstream of the project site, and would not be anticipated to change the amount of surface water in any water body in an amount that could initiate a new cycle of erosion or sedimentation downstream of the project site. The City is primarily located in the Lower San Gabriel River sub-watershed area. The onsite drainage system will capture the incremental increase in runoff from the project site associated with project development. Onsite flows will be pretreated and flow collected and discharged through biofiltration planters. These systems will be designed to capture the peak flow runoff from the project site greater than 100-year flows, or otherwise detain this flow on site. Treated surface runoff will be discharged in conformance with Los Angeles County and City of Whittier requirements. The downstream drainage system will not be altered given the control of future surface runoff from the project site. The City GPEIR identifies the above, in addition to compliance with the City's development review procedures, which require new projects to be consistent with regulations of federal and state agencies regarding BMPs to protect water quality, including erosion control, as sufficient to ensure a less than significant impact under this issue. Thus, the potential for downstream erosion or sedimentation will be controlled to a less than significant impact level.

c. ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?

Less Than Significant Impact – The proposed project will alter the existing drainage pattern onsite (there are no drainage courses) but will maintain the existing offsite downstream drainage system through control of future discharges from the site through the bioretention basin, which would prevent flooding onsite or offsite from occurring. Onsite flows will be pretreated and collected through flow through biofiltration planters. These systems will be designed to capture any excess runoff from the project site after development. The City GPEIR identifies compliance with the City's development review procedures, which require new projects to be consistent with flood control regulations and guidelines of federal and state agencies to protect downstream properties, as sufficient to ensure a less than significant impact under this issue. Thus, the implementation of onsite drainage system improvements and applicable requirements included in the WQMP will ensure that stormwater runoff will not substantially increase the rate or volume of runoff in a manner that would result in substantial flooding on- or off-site. Impacts under this issue are considered less than significant with no mitigation required.

c. iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant With Mitigation Incorporated – The proposed project will alter the site such that stormwater runoff within the site may be increased, but will maintain the existing off-site downstream drainage system through control of future discharges from the site. This would prevent the project from exceeding the capacity of existing or planned stormwater drainage systems and from providing substantial additional sources of polluted runoff. The drainage throughout the project site will be captured and treated in the proposed biofiltration planters. These systems will be designed to capture

the flows above the peak 100-year flow runoff from the project site without development or otherwise be detained on site and discharged in conformance with Los Angeles County requirements. The runoff points from the site will remain the same and the outlets from the storm drain system will keep the peak flows within 10% of the existing peak flows. This project would discharge into the regional system that flows into Lower San Gabriel River sub-watershed, which eventually conveys flows to the Pacific Ocean. Varying amounts of urban pollutants, such as motor oil, antifreeze, gasoline, pesticides, detergents, trash, animal wastes, and fertilizers, could be introduced into downstream stormwater. However, the proposed project is not anticipated to generate discharges that would require pollution controls beyond those already designed into the project and/or required by the City as a standard operating procedure to meet water quality management requirements from the RWQCB. The proposed development would install onsite and offsite drainage improvements, including the bioretention planters, and connect to existing the drainage system downstream. The project is not anticipated to result in a significant adverse impact to water quality or flows downstream of the project with implementation of mitigation outlined below.

The City and County have adopted stringent best management practices designed to control discharge of non-point source pollution that could result in a significant adverse impact to surface water quality. The City has implemented a stringent non-point source water pollution control program. The City has identified BMPs that when implemented, can ensure that neither significant erosion and sedimentation, nor other water quality degrading impacts will occur as a result of developing the project. Although BMPs are mandatory for the project to comply with established pollutant discharge requirements, the following mitigation measure is designed to establish a performance standard to ensure that the degree of water quality control is adequate to ensure the project does not contribute significantly to downstream water quality degradation.

HYD-1 ***The project proponent will select best management practices from the range of practices identified by the City and reduce future non-point source pollution in surface water runoff discharges from the site to the maximum extent practicable, both during construction and following development. The Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP) shall be submitted to the City for review and approval prior to ground disturbance and the identified BMPs installed in accordance with schedules contained in these documents.***

Compliance will also be ensured through fulfilling the requirements of a SWPPP and WQMP the implementation of which will be monitored by the City and the RWQCB. The SWPPP must incorporate the BMPs that meet the performance standard established in MM **HYD-1** for both construction and occupancy stages of the project. Thus, the implementation of onsite drainage improvements and applicable requirements will ensure that that drainage and stormwater will not create or contribute runoff that would exceed the capacity of existing or planned offsite stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts under this issue are considered less than significant with mitigation required.

c. iv. Impede or redirect flood flows?

Less Than Significant Impact – As shown on the Envision Whittier General Plan provided as Figure X-1, the project site is located within an area delineated as having a minimal flood hazard potential. Furthermore, development of this site is not anticipated to redirect or impede flood flow at the project site, particularly given that surface flows on site will be directed to the onsite drainage features which will be capable of intercepting the peak 100-year flow rate from the project site or otherwise be detained on site and discharged in conformance with Los Angeles County requirements. Therefore, impacts under this issue are considered less than significant and no mitigation is required.

d. *Less Than Significant Impact* – Implementation of the project will not expose people or structures to a significant risk of inundation by seiche, tsunami, or other flood hazards. According to the Envision

Whittier General Plan Map depicting Inundation Hazards (Figure X-2), the proposed project is not located in an area of dam inundation or by any of the surrounding reservoirs, and as it is located outside of the inundation area, the potential for seiche to occur from these enclosed bodies of water that would impact the proposed project is negligible. Furthermore, the project is located about 15 miles from the Pacific Ocean, and is located at an elevation that is about 317 feet above mean sea level (amsl). Therefore, the potential to expose people or structures to a significant risk of flood hazard due to dam inundation, tsunami, or seiche would be minimal. Furthermore, as discussed under Subchapter IX, Hazards and Hazardous Materials, as well as under issues X(a) and (c[i-iv]), above, the proposed project would manage the potential for polluted runoff and therefore would manage the potential for pollutant release in the unlikely event of project inundation. Thus, impacts under this issue are less than significant and no mitigation is required.

e. *Less Than Significant Impact* – According to the City's GPEIR, the Water Quality Control Plan Los Angeles Region (Basin Plan) is the water quality control plan for the greater Los Angeles Basin, including the City of Whittier. All development within the City is required to be consistent with the Basin Plan, as such, as this is a City requirement, the proposed project has been designed to not conflict with Basin Plan.

Whittier is underlain by the Los Angeles coastal plain groundwater basin system. This system is made up of five groundwater basins: West Coast, Santa Monica, Hollywood, Central Basin, and the Orange County Coastal Plain. Whittier is located within the Central Basin which underlies a large portion of the southeastern part of the Los Angeles coastal plain. This groundwater basin is considered a very low priority. The Sustainable Groundwater Management Act (SGMA) "requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline."[7] The City's GPEIR indicates that the two local Watermasters are currently in the process of determining if it will form or join a groundwater sustainability agency (GSA) to prepare groundwater sustainability plan (GSPs) for their respective groundwater basins. Once the GSPs are developed, the UWMPs of the four-local water-serving agencies/companies will need to bring their UWMPs into compliance or consistency with the GSP. As stated under issue X(b), above, the proposed project would comply with the City's GPEIR MM **UTIL-1**, which prevents future development from occurring where the development would demand water in excess of what is identified for supply in 2040 under the most recent UWMP. As the proposed project would not demand water in excess of the identified supply by the City's 2020 UWMP, the proposed project would have a less than significant potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan

[7] https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XI. LAND USE AND PLANNING: Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

SUBSTANTIATION

a. *No Impact* – Refer to the aerial photos provided as Figures 1 and 2, which depict the project's regional and site-specific location. The project site would be developed within a site zoned for urban development under the UWSP, specifically Uptown Center, which allows for multi-family uses. The project is located within a developed site containing an office and parking lot, surrounded by comparable urban development. The development of The Comstock Project at this location would be consistent with both the uses surrounding the project and the surrounding land use designations and zoning classifications. Consequently, the development of the project site with the proposed use will not divide any established community in any manner. Therefore, no significant impacts under this issue are anticipated and no mitigation is necessary.

b. *Less Than Significant Impact* – The project site encompasses about 0.82 acre, and it is zoned for Specific Plan use (UWSP, Uptown Center). The project proposes a total of 52 units at a density of 63.4 dwelling units per acre (DU/A). With approval of the certain amendments to the UWSP outlined in the project description, the proposed Comstock Multi-Family Project will be fully consistent the City's zoning classification and general plan designation for the project site. These amendments are detailed in the project description and would have minimal effect on the welfare of the citizens of the City of Whittier, which is protected through the provisions in both the City's General Plan and the UWSP. Ultimately, the modifications to the specific plan proposed by this project would include more flexible parking restrictions, allowing for expanded use of small sites such as the site within which the project is proposed. The modifications would further aid the City in meeting Southern California Association of Governments (SCAG) Regional Housing Needs Assessment (RHNA) by enabling development of multi-family housing within small parcels within the UWSP. These modifications are supportive of the intent of the UWSP and would comply with the City's General Plan.

A review of the Land Use Element Goals indicates that of the 26 goals, the proposed project is consistent with Goals 1, Policy LUCC-1.3, Goal 2, LUCC-2.4, and Goal 3, LUCC-3.1, 3.2, 3.5. All other Land Use Element Goals are not applicable to the proposed project.

A review of all other General Plan Element Goals (Mobility and Infrastructure, Housing Element, Historic Resources Element, Resource Management Element, and Public Safety, Noise, and Health Element) indicates that the proposed project is consistent with all applicable Goals, often with mitigation, as demonstrated by the findings in the pertinent sections of this Initial Study. The proposed project can be implemented without significant effects on the circulation system; all infrastructure exists at or can be extended to the site to support the 52 apartment unit project; it can meet the City's goal to establish and maintain a balanced, multi-modal transportation network that enables residents to travel safely and minimize environmental and neighborhood impacts in the City; it will provide the City with additional facilities to support human resident recreation needs, as well as meet the needs of the Housing Element; it will not generate significant air emissions or GHG emissions; it will meet noise design requirements with mitigation; it can meet all Public Safety, Noise, and Health Element requirements; and it implements the City's Housing Element, specifically Goals 1 and 3 which state:

- *Goal 1: Encourage a variety of housing types to meet the existing and future needs of City residents.*
    - *HE-1.1: Implement land use policies and standards that allow for a range of residential densities and products that will provide households of all types and income levels the opportunity to find suitable ownership or rental housing.*
    - *HE-1.2: Encourage residential development in key areas, L Line transit-oriented district, Uptown, and along Lambert Road and Whittier Boulevard corridors, to create active, enlivened destinations and centers that encourage transit use, improve walkability, while providing housing for all income levels and a diversity of housing types.*
    - *HE-1.3: Encourage infill development and recycling of land to provide adequate residential sites.*
    - *HE-1.4: Support the assembly of small vacant or underutilized parcels to enhance the feasibility of infill development.*
- *Goal 3: Address and where legally possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities.*
    - *HE-3.1: Review projects in as timely a manner as possible, while maintaining adequate public involvement and fulfilling the appropriate requirements of state and local laws.*
    - *HE-3.3: Use the community benefit program, density bonuses, fee reductions, or other regulatory incentives, as available and appropriate, to minimize the effect of governmental constraints.*
    - *HE-3.6: Encourage energy conservation and sustainable building measures in new and existing homes through adherence to the California Green Building Code.*

In addition to the above goals and policies pertaining to the City's Housing Element, the proposed project would comply with the Resource Management Element (natural environment, water resources, air quality, greenhouse gas, and associated health effects, tribal resources, oil and gas, parks and open spaces, and urban forestry, and energy demands). Specifically, an Arborist Report (Appendix 4) was prepared to address the potential impacts to trees within the project area of potential effects (APE). Resources Management Element Goals and Policies that are applicable to this project are as follows:

- *Goal 11: An urban forestry program that provides for shaded green spaces citywide, preserves long-established character of Whittier's boulevards, and provides incentives for tree planting and preservation on private properties.*
    - *RM-11.2: Maintain a street tree and planting plan that includes strategies for long-term planned replacement of specimen trees due to age or disease.*
    - *RM-11.6: Require tree planting for all new development projects with trees that are climate appropriate, add quality and character to a site, and forward the City's climate adaption goals.*
    - *RM-11.7: Aim to protect mature trees and urban forests.*

The proposed project would require the removal of 5 existing *Ficus nitida* (Indian Laurel Trees) along Comstock Avenue and Philadelphia Street in order to enable site development. The five individual Ficus trees supported extensive surface roots. Existing conditions have expose the Ficus' surface root systems to be very shallow and in contact with many of these uplifted/damaged features referenced in the Arborist Report. The Arborist Report makes the determination that, these trees would be subject to significant disaffection as the result of substantial efforts to repair the uplifting damage caused by the existing root systems. Additionally, the trees would be subject to severe impacts to their surface root structures in any such effort and would experience significant decline to both their systemic vigor (growth systems) and structural integrity (ability to support themselves) in any such demolition and reconstruction efforts. Therein, the trees would be subject to severe decline and catastrophic failure and collapse if they were subject to conservation in place during such operations. Thus, as described in the Arborist Report, these street trees should be removed and replaced, in the context of the site's redevelopment, with a species that is less invasively surface rooted, smaller in mature stature, and upright in growth form, and therefore more well-suited to the

setting of multi-family building(s), more vertical spaces, and realistic street frontages planter sizes. The replacement street trees shall be in conformance with the trees specified in the Uptown Whittier Streetscape Beautification Plan adopted by City Council on May, 28, 2019. The Applicant will be required, through MM **AES-1**, to obtain tree removal permits pursuant to City of Whittier Municipal Code 12.40. Given the above discussion, the development of the proposed project would ensure that, while trees would be removed, their removal is imperative given the condition of the existing trees. Furthermore, per the landscape plans (Figure I-1) that have been developed for the proposed Comstock Multi-Family Project, replacement trees would be sizable at the start, thus ensuring that the City's urban forest is protected. Thus, the proposed project would conform with the City's Resources Management Element.

Therefore, the implementation of this project at this site is consistent with the City's plans and policies. Based on the preceding information, implementation of the Comstock Multi-Family Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, zone classification, or the City's Municipal Code) adopted for the purpose of avoiding or mitigating an environmental effect. No adverse impacts are anticipated under this issue and no additional mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XII. MINERAL RESOURCES: Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

SUBSTANTIATION

a&b. *No Impact* – The proposed site for the Comstock Multi-Family Project is highly disturbed as it is currently developed with an office and a parking lot. The site is in an urbanized area surrounded by development to the south, east, west, and north within the City of Whittier's Uptown area. According to the map prepared for the Whittier GPEIR depicting Oil Production Facilities, provided as Figure XII-1, the project is not located on a site that has potential for oil production, or for other mineral resources to occur. The City's GPEIR indicates that future development within the City that complies with the City's land use designation, would have no potential to impact mineral resources. As the proposed project would comply with the City's land use designation, the development of the proposed project will not cause any loss of mineral resource values to the region or residents of the state, nor would it result in the loss of any locally important mineral resources identified on the Envision Whittier General Plan. No impacts would occur under this issue. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIII. NOISE: Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of a project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

SUBSTANTIATION: A Noise Impact Analysis (NIA) was prepared for the proposed project. It is provided as Appendix 12 to this Initial Study and is titled "Comstock Residential, Noise Impact Analysis, City of Whittier" prepared by Urban Crossroads dated January 13, 2022.

Background

Noise is generally described as unwanted sound. The proposed project will include the development of a 52-unit multi-family apartment complex as well as associated site improvements. The site is located within the City of Whittier within the Uptown area of the City, and as such is surrounded by urban development. The distance to the nearest sensitive receptors are about 200 feet from the project site, as there are scattered multi-family residences in all directions in this area. Regardless, the background noise level at the project site is moderate to high, given the urban environment within which the project will be developed.

The unit of sound pressure ratio to the faintest sound detectable to a person with normal hearing is called a decibel (dB). Sound or noise can vary in intensity by over one million times within the range of human hearing. A logarithmic loudness scale, similar to the Richter scale for earthquake magnitude, is therefore used to keep sound intensity numbers at a convenient and manageable level. The human ear is not equally sensitive to all sound frequencies within the entire spectrum. Noise levels at maximum human sensitivity from around 500 to 2,000 cycles per second are factored more heavily into sound descriptions in a process called "A-weighting," written as "dBA."

L_{eq} is a time-averaged sound level; a single-number value that expresses the time-varying sound level for the specified period as though it were a constant sound level with the same total sound energy as the time-varying level. Its unit is the decibel (dB). The most common averaging period for L_{eq} is hourly.

Because community receptors are more sensitive to unwanted noise intrusion during more sensitive evening and nighttime hours, state law requires that an artificial dBA increment be added to quiet time noise levels. The State of California has established guidelines for acceptable community noise levels that are based on the Community Noise Equivalent Level (CNEL) rating scale (a 24-hour integrated noise measurement scale). The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," and "clearly unacceptable" noise levels for various land use types. The State Guidelines, Land Use Compatibility for Community Noise Exposure, single-family homes are "normally acceptable" in exterior noise environments up to 60 dB CNEL and "conditionally acceptable" up to 70 dB CNEL based on this scale. Multiple family residential uses are "normally acceptable" up to 65 dB CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries and churches are "normally acceptable"

up to 70 dB CNEL, as are office buildings and business, commercial and professional uses with some structural noise attenuation.

Significance Thresholds

Envision Whittier General Plan

The City of Whittier has adopted Section 8, Noise Element, of the Envision Whittier General Plan to control and abate environmental noise, and to protect the citizens of Whittier from excessive exposure to noise. The Noise section specifies the maximum allowable exterior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. In addition, the Noise section identifies noise polices designed to protect, create, and maintain an environment free from noise that may jeopardize the health or welfare of sensitive receivers, or degrade quality of life. To protect City of Whittier residents from excessive noise, the Noise section contains the following goal related to the project:

Goal 1: Minimize Noise Levels
Policy 1.1: Work for Separation of Freeways and Highways from noise-sensitive land uses.
Policy 1.2: Correct existing noise problems and avoid future noise problems.

Goal 2: Discourage Noise
Policy 2.1: Control Noise at their source.
Policy 2.2: Evaluate and control noise impacts during review process.
Policy 2.3: Encourage noise attenuation devices and limited hours of operation.
Policy 2.4: Support the enforcement of noise control regulations.
Policy 2.5: Establish acceptable noise standards.

Land Use Compatibility

The Noise Compatibility Matrix in the Envision Whittier General Plan Noise section provides guidelines to evaluate the land use compatibility of transportation related noise. The compatibility criteria, shown on Exhibit XII-1, provides the City with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels.

The Noise Compatibility Matrix describes categories of compatibility and not specific noise standards. According to these categories of compatibility, sensitive residential land use in the project study area is considered clearly compatible with exterior noise levels below 60 dBA CNEL and normally compatible with exterior noise levels below 70 dBA CNEL. For normally compatible land use, new construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Municipal Code
To analyze noise impacts originating from a designated fixed location or private property such as the Comstock Multi-Family Project, stationary-source (operational) noise is typically evaluated against standards established under a City's Municipal Code where available.

Chapter 8.32 of the City of Whittier Municipal Code regulates control of noise and vibration. This Chapter was updated in January 2010 and replaced text that prescribed specific noise limits, similar to the County Code above. The current City Municipal Code is more general in nature and does not prescribe specific noise limits. Section 8.32.030 of the City Municipal Code specifies: It shall be unlawful for any person to willfully make or continue, or cause to be made or continued, any excessive or unreasonable noise, which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. Section 8.32.060 indicates that the official's

normal hearing faculties shall be the primary means of noise detection. Based on the evaluation criteria, a readily noticeable change of ≥ 5 dBA CNEL project increase is used to evaluate operational noise impacts.

Exhibit XII-1: CITY OF WHITTIER NOISE AND LAND USE COMPATIBILITY GUIDELINES

Land Use Category	Community Noise Exposure Limit (CNEL or DNL, dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential - Low-Density Single-Family, Duplex, Mobile Homes	60	70	75	75+
Residential - Multi-Family	65	70	75	75+
Transient Lodging - Motels, Hotels	65	70	80	80+
Schools, Libraries, Churches, Hospitals, Nursing Homes	70	70	80	80+
Auditoriums, Concert Halls, Amphitheaters	N/A	70	N/A	70+
Sports Arenas, Outdoor Spectator Sports	N/A	N/A	75	75+
Playgrounds, Neighborhood Parks	70	70	75	75+
Golf Courses, Riding Stables, Water Recreation, Cemeteries	75	N/A	80	80+
Office Buildings, Business Commercial and Professional	70	77.5	77.5+	N/A
Industrial, Manufacturing, Utilities, Agriculture	75	80	80+	N/A
Source: OPR, 2017, Appendix D				

Construction Noise Standards

Section 8.32.040 discusses loud, annoying, and unnecessary noises, and specifically defines horns and signaling devices (section F), erection or demolition of buildings, the grading and excavation of land, the start-up and use of heavy equipment (e.g., dump trucks and graders), and the use of jack hammers. These noises would be in violation of the Municipal Code except on weekdays between the hours of 7:00 a.m. and 6:00 p.m. and on Saturdays 8:00 a.m. to 5:00 p.m.

However, neither the Envision Whittier General Plan nor Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers. Therefore, a numerical construction threshold based on Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* is used for analysis of daytime construction impacts. According to the FTA, local noise ordinances are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA L_{eq} as a reasonable threshold for residential land uses, 85 dBA L_{eq} for commercial land uses, and 90 dBA L_{eq} q for industrial uses.

Construction Vibration Standards

Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment such as air compressors, light trucks, hydraulic loaders, etc., generates little or no ground vibration.

To analyze vibration impacts originating from the operation and construction of the Comstock Residential, vibration-generating activities are appropriately evaluated against standards established under a City's Municipal Code, if such standards exist. However, the City of Whittier does not identify specific vibration level limits. Therefore, for analysis purposes, the Caltrans Transportation and Construction Vibration Guidance Manual, (11 p. 38) Table 19, vibration damage are used in this noise study to assess potential temporary construction-related impacts at adjacent building locations. The construction vibration damage potential criteria include consideration of the building conditions. (3 p. 182) Table XIII-1 describes the maximum acceptable transient and continuous vibration building damage potential levels by structure type and condition. The existing buildings adjacent to the project site can best be described as "older residential structures" with a maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec).

Table XIII-1
BUILDING DAMAGE VIBRATION CRITERIA

Structure and Condition	Maximum Transient Vibration Levels PPV (in/sec)	Maximum Continuous Vibration Levels PPV (in/sec)
Extremely fragile historic buildings	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial / commercial buildings	2.0	0.5

Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Tables 19, p. 38.

Noise Sensitive Receivers

Furthermore, based on Section 8.32.060 of the City of Whittier Municipal Code, a readily noticeable change of ≥ 5 dBA CNEL project increase is used to evaluate operational noise impacts.

Significance Criteria

Table XIII-2
SIGNIFICANCE CRITERIA SUMMARY

Analysis	Condition(s)	Significance Criteria	
		Daytime	Nighttime
On-Site Traffic Noise	Exterior Noise Level Criteria[1]	See Exhibit XII-1	
	Interior Noise Level Standard[2]	45 dBA CNEL	
Operational	Exterior Noise Level Standards[3]	≥ 5 dBA CNEL Project increase	
Construction Noise & Vibration	Stationary Equipment Noise Level Threshold[3]	60 dBA L_{max}	N/A
	Vibration Level Threshold[4]	0.3 PPV in/sec	

1 City of Whittier General Plan, 2021.
2 City of Whittier Municipal Code Section 8.32.060.
3 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018. "Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

Existing Noise Level Measurements

To assess the existing noise level environment, 24-hour noise level measurements were taken at five locations in the project study area. The receiver locations were selected to describe and document the existing noise environment within the project study area. Figure XIII-1 provides the boundaries of the project study area and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected by Urban Crossroads, Inc. on Tuesday, November 23rd, 2021.

Noise Measurement Results

The noise measurements presented below focus on the equivalent noise level or L_{eq}. The L_{eq} represents a steady state sound level containing the same total energy as a time varying signal over a given sample period. Table XIII-3 identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location.

Table XIII-3
24-HOUR AMBIENT NOISE LEVEL MEASUREMENTS

Location[1]	Description	Energy Average Hourly Noise Level (dBA L_{eq})[2]	
		Daytime	Nighttime
L1	Located northwest of the project site near multi-family residential at 6704 Milton Avenue.	55.4	48.9
L2	Located east of the project site near Victory Outreach Church at 7021 Greenleaf Ave #1305.	58.2	53.4
L3	Located southwest of the project site near single-family residence at 7052 Milton Avenue.	62.8	54.7
L4	Located west of the project site near single-family residence at 7014 Milton Avenue.	55.9	51.0

[1] See Figure XIII-1 for the noise level measurement locations.
[2] The long-term 24-hour measurement printouts are included in Appendix 5.1 of the NIA.
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

Table XIII-3 provides the (energy average) noise levels used to describe the daytime and nighttime ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. Appendix 5.2 of the NIA provides summary worksheets of the noise levels for each hour as well as the minimum, maximum, L1, L2, L5, L8, L25, L50, L90, L95, and L99 percentile noise levels observed during the daytime and nighttime periods.

The background ambient noise levels in the project study area are dominated by the transportation-related noise associated with the local surface streets surrounding the project site and measurement locations. This includes the auto and heavy truck activities on study area roadway segments near the noise level measurement locations.

Sensitive Receiver Locations

To assess the potential for long-term operational and short-term construction noise impacts, the following sensitive receiver locations, as shown on Figure XIII-2, were identified as representative locations for analysis. Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas.

To describe the potential off-site project noise levels, five receiver locations (R#) in the vicinity of the project site were identified. All distances are measured from the project site boundary to the outdoor living areas (e.g., private backyards) or at the building façade, whichever is closer to the project site. Distance is measured in a straight line from the project boundary to each receiver location.

- R1: R1 represents the Whittier Hospital Medical Center Emergency Room at 6737 Milton Avenue, approximately 352 feet northwest of the project site and is placed at the nearest building façade. A 24-hour noise measurement was taken near this location, L1.
- R2: R2 represents the Grace Brethren Church Whittier at 15215 Janine Drive, approximately 563 feet north of the project site and is placed at the nearest building façade. A 24-hour noise measurement was taken near this location, L1.
- R3: R3 represents the Victory Outreach Church at 7021 Greenleaf Ave #1305, approximately 225 feet east of the project site and is placed at the nearest building façade. A 24-hour noise measurement was taken near this location, L2.
- R4: R4 represents an existing single-family residence at 7052 Milton Avenue, approximately 174 feet southwest of the project site and is placed at the outdoor living areas (backyards). A 24-hour noise measurement was taken near this location, L3.
- R5: R5 represents an existing single-family residence at 7014 Milton Avenue, approximately 33 feet west of the project site and is placed at the outdoor living areas (backyards). A 24-hour noise measurement was taken near this location, L4.

Impact Analysis

a. *Less Than Significant Impact* – As stated above, a Noise Impact Analysis (NIA) was prepared on behalf of the proposed project to ascertain whether the proposed project would result in significant: On Site Noise, Interior Noise, Operational Noise, Construction Noise or Vibration. As such the following discussion includes analysis of each of these types of noise and impacts thereof:

On Site Traffic Noise Impacts

An on-site exterior noise impact analysis has been completed to determine the traffic noise exposure and to identify potential necessary noise abatement measures for the proposed Comstock Multi-Family Project that is consistent with City of Whittier noise standards. It is expected that the primary source of noise impacts to the project site will be traffic noise from Philadelphia Street and Comstock Avenue. The project will also experience some background traffic noise from the project's internal local streets, however, due to the low traffic volume/speeds, traffic noise from these roads will not make a significant contribution to the noise environment.

On-Site Exterior Noise Analysis
Table XIII-4 presents a summary of future exterior noise levels at the building façade within the project site. The on- site traffic noise level analysis indicates that the building facades will experience exterior noise levels ranging from 62.1 to 64.9 dBA CNEL.

The future exterior noise levels at the proposed buildings facades are shown to range from 62.1 to 64.9 dBA CNEL. This noise analysis shows that the future noise will meet the City of Whittier 65 dBA CNEL exterior noise level standards for multi-family residential land uses.

Table XIII-4
EXTERIOR NOISE LEVELS (CNEL)

Roadway	Unmitigated Exterior Noise Level (dBA CNEL)[1]			
	1st Floor	2nd Floor	3rd Floor	4th Floor
Philadelphia Street	64.9	64.4	64.5	63.7
Comstock Street	63.6	64.1	63.1	62.1

[1] Exterior noise calculations at the building façade are shown in Appendix 7.1 of the NIA.

As shown in Table XIII-4, exterior noise levels will meet the City of Whittier noise level normally compatible level for multi-family residential land uses. Therefore, "Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements." As such, on site traffic noise would not result in a significant noise impact as a result of implementation of the proposed project.

Operational Noise Impacts

Operational Noise Sources
The proposed residential development is not expected to include any specific type of operational noise levels beyond the typical noise sources associated with residential land uses in the project study area. However, to present a conservative approach, on-site project-only operational noise sources are analyzed in this noise study and are expected to include: heating, ventilation, and air conditioning units, and trash enclosure/collection activity.

Roof-Top Air Conditioning Units
The air conditioning units are expected to be located the roofs of the buildings. Based on manufactures specifications, a model 24ABC6-24 generates a sound power level of 76 dBA Lw. This is equivalent to a continuous sound level of 44.4 dBA L_{eq} at 50 feet. While operating at full power air conditioners would operate in multiple cycles approximately 15-30 minutes out of an hour during the nighttime and 20-45 minutes during the daytime. To be conservative, it was assumed the air conditioners would operate 45 minutes during the daytime and 30 minutes at night. This is equivalent to the air conditioning units operating at full capacity. These sources of noise activity will likely vary throughout the day as well as the year.

Trash Enclosure/Collection Activity
To describe the noise levels associated with a trash enclosure and collection activity, Urban Crossroads collected a reference noise level measurement at an existing trash enclosure containing two dumpster bins. The trash enclosure noise levels describe metal gates opening and closing, metal scraping against concrete floor sounds, dumpster movement on metal wheels, and trash dropping into the metal dumpster. The reference noise levels describe trash enclosure noise activities when trash is dropped into an empty metal dumpster, as would occur at the project site. The measured reference noise level at the uniform 50-foot reference distance is 57.3 dBA L_{eq} for the trash enclosure activity. The reference noise level describes the expected noise source activities associated with the trash enclosures for the project's proposed building. Typical trash enclosure activities are estimated to occur for 10 minutes per hour.

The reference project operational sound power levels are summarized in Table XIII-5.

Table XIII-5
REFERENCE NOISE LEVELS

Noise Sources	Noise Source Height (ft)	Source Type	Min/Hour[2]		Reference Noise Level (dBA L_{eq}) @ 50 Feet	Sound Power Level (dBA)[3]
			Day	Night		
Rooftop AC	3	Point	45	30	44.4	76.0
Trash Enclosure[1]	5'	Point	10	10	57.3	88.9

1 As measured by Urban Crossroads, Inc.
2 Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the project site. "Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.
3 Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calculated using the Computer Aided Noise Abatement: CadnaA noise model at the reference distance to the noise source. Numbers may vary due to size differences between point and area noise sources.

Operational Noise Levels

Using the reference noise levels to represent the proposed project operations that include heating, ventilation, and air conditioning units, and trash enclosure/collection activity, Urban Crossroads, Inc. calculated the unmitigated operational source noise levels that are expected to be generated at the project site and the project-related noise level increases that would be experienced at each of the sensitive receiver locations. Table XIII-6 shows the project operational daytime noise levels. The hourly noise levels at the off-site receiver locations are expected to range from 35.6 to 48.9 dBA L_{eq}.

Table XIII-6
PROJECT DAYTIME OPERTAIONAL LEVELS

Noise Source[1]	Operational Noise Level by Receiver Location (dBA L_{eq})[1]				
	R1	R2	R3	R4	R5
Rooftop AC	36.9	33.9	41.6	39.3	47.5
Trash Enclosure[1]	24.7	30.6	27.3	32.6	43.2
Total (All Noise Sources)	**38.9**	**35.6**	**41.8**	**40.1**	**48.9**

[1] See Figure XIII-3 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 of the NIA.

Table XIII-7 shows the project operational noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 33.8 to 47.1 dBA L_{eq}. The differences between the daytime and nighttime noise levels is largely related to the duration of noise activity.

Table XIII-7
PROJECT NIGHTTIME OPERTAIONAL LEVELS

Noise Source[1]	Operational Noise Level by Receiver Location (dBA L_{eq})[1]				
	R1	R2	R3	R4	R5
Rooftop AC	35.1	32.1	39.9	37.6	45.8
Trash Enclosure[1]	33.0	28.8	25.5	30.8	41.4
Total (All Noise Sources)	**37.2**	**33.8**	**40.1**	**38.4**	**47.1**

[1] See Figure XIII-3 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 of the NIA.

Project Operational Noise Level Increases

To describe the project operational noise level increases, the project operational noise levels are combined with the existing ambient noise levels measurements for the nearest receiver locations potentially impacted by project operational noise sources. Noise levels that would be experienced at receiver locations when project-source noise is added to the daytime and nighttime ambient conditions are presented on Tables XIII-6 and XIII-7, respectively.

As indicated on Tables XIII-8 and XIII-9, the project will generate an unmitigated daytime and nighttime operational noise level increases ranging from 0.0 to 1.5 dBA L_{eq} at the nearest receiver locations. In effect, the amount to which a given noise level increase is considered acceptable is reduced based on existing ambient noise conditions. The project-related operational noise level increases will satisfy the operational noise level increase criteria at the nearest sensitive receiver locations and the impact will be less than significant.

Table XIII-8
DAYTIME PROJECT OPERATIONAL NOISE LEVEL INCREASES

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project & Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	38.9	L1	55.4	55.5	0.1	5.0	No
R2	35.6	L1	55.4	55.4	0.0	5.0	No
R3	41.8	L2	58.2	58.3	0.1	5.0	No
R4	40.1	L3	62.8	62.8	0.0	3.0	No
R5	48.9	L4	55.9	56.7	0.8	5.0	No

1 See Figure XIII-2 for the receiver locations.
2 Total project daytime operational noise levels as shown on Table XIII-6.
3 Reference noise level measurement locations as shown on Figure XIII-1.
4 Observed daytime ambient noise levels as shown on Table XIII-3.
5 Represents the combined ambient conditions plus the project activities.
6 The noise level increase expected with the addition of the proposed project activities.
7 See Table XIII-2.

Table XIII-9
NIGHTTIME PROJECT OPERATIONAL NOISE LEVEL INCREASES

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project & Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	37.2	L1	48.9	49.2	0.3	5.0	No
R2	33.8	L1	48.9	49.0	0.1	5.0	No
R3	40.1	L2	53.4	53.6	0.2	5.0	No
R4	38.4	L3	54.7	54.8	0.1	5.0	No
R5	47.1	L4	51.0	52.5	1.5	5.0	No

1 See Figure XIII-2 for the receiver locations.
2 Total project daytime operational noise levels as shown on Table XIII-7.
3 Reference noise level measurement locations as shown on Figure XIII-1.
4 Observed daytime ambient noise levels as shown on Table XIII-3.
5 Represents the combined ambient conditions plus the project activities.
6 The noise level increase expected with the addition of the proposed project activities.
7 See Table XIII-2.

Construction Impacts

This section analyzes potential impacts resulting from the short-term construction activities associated with the development of the project. Figure XIII-4 shows the construction noise source locations in relation to the nearest sensitive receiver locations. To prevent high noise-levels of construction noise from impacting noise-sensitive land uses, Section 8.32.040 of the City of Whittier Municipal Code prohibits construction activities between the hours of 6:00 p.m. and 7:00 a.m. and on Saturdays 5:00 p.m. and 8:00 a.m.

Noise generated by the project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment are expected to occur in the following stages:

- Demolition
- Site Preparation
- Grading
- Building Construction

- Paving
- Architectural Coating

To describe peak construction noise activities, this construction noise analysis was prepared using reference noise level measurements published in the Federal Highway Administration (FHWA) Road Construction Nosie Model (RCNM). Table XIII-10 provides a summary of the FHWA construction reference noise level measurements expressed in hourly average dBA L_{eq} using the estimated FHWA RCNM usage factors to describe the typical construction activities for each stage of project construction.

Table XIII-10
CONSTRUCTION REFERENCE NOISE LEVELS

Construction Stage	Reference Construction Activity[1]	Reference Noise Level @ 50 Feet (dBA L_{eq})	Composite Reference Noise Level (dBA L_{eq})	Reference Noise Level (dBA L_w)
Demolition	Front End Loader	75	83.8	115.4
	All Other Equipment	82		
	Excavator	77		
Site Preparation	Dozer	78	81.0	112.7
	Front End Loader	75		
	Front End Loader	75		
Grading	Dozer	78	81.8	113.5
	Excavators	77		
	Compactors (ground)	76		
Building Construction	Cranes	73	81.1	112.8
	Tractors	80		
	Welders/Torch	70		
Paving	Pavers	74	83.1	114.7
	All Other Equipment	82		
	Rollers	73		
Architectural Coating	Cranes	73	77.4	109.1
	Air Compressors (air)	74		
	Generator Sets (<25kVA)	70		

[1] FHWA Road Construction Noise Model

Construction Noise Analysis

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the project construction noise level impacts at the nearest sensitive receiver locations were completed. To assess the worst-case construction noise levels, the project construction noise analysis relies on the highest combined reference noise level operating at the closest point from the edge of primary construction activity (project site boundary) to each receiver location. As shown on Table XIII-11, the construction noise levels are expected to range from 52.9 to 77.2 dBA L_{eq}, and the highest construction levels are expected to range from 59.3 to 77.2 dBA L_{eq} at the nearest receiver locations.

Table XIII-11
TYPICAL CONSTRUCTION EQUIPMENT NOISE LEVEL SUMMARY

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})						
	Demolition	Site Prep	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[3]
R1	62.2	59.4	60.2	59.5	61.6	55.8	62.2
R2	59.3	56.5	57.3	56.6	58.6	52.9	59.3
R3	67.1	64.3	65.1	64.4	66.4	60.7	67.1
R4	67.2	64.4	65.2	64.5	66.5	60.8	67.2
R5	77.2	74.4	75.2	74.5	76.5	70.8	77.2

1 Construction noise source and receiver locations are shown on Exhibit 10-A of the NIA.
2 Construction noise level calculations based on distance from the project site boundaries (construction activity area) to nearby receiver locations. CadnaA construction noise model inputs are included in Appendix 10.1 of the NIA.

To evaluate whether the project will generate potentially significant short-term noise levels at nearest receiver locations, a construction-related, daytime noise level thresholds based on land use as developed by the FTA are used as reasonable thresholds to assess the daytime construction noise level impacts. The construction noise analysis shows that the nearest receiver locations will satisfy the significance thresholds during project construction activities as shown on Table XIII-12.

Table XIII-12
CONSTRUCTION NOISE ANALYSIS AT THE NEAREST RECEIVER LOCATIONS

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})			
	Highest Construction Noise Levels[2]	Land Use	Threshold[3]	Threshold Exeeded[4]
R1	62.2	Medical	80	No
R2	59.3	Religious	80	No
R3	67.1	Religious	80	No
R4	67.2	Residential	80	No
R5	77.2	Residential	80	No

1 Noise receiver locations are shown on Figure XIII-4.
2 Highest construction noise level operating at the project site boundary to nearby receiver locations (Table XIII-11).
3 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.
4 Do the estimated project construction noise levels exceed the construction noise level threshold?

Therefore, the noise impacts due to project construction noise is considered less than significant at all receiver locations.

Conclusion
Given the discussion above, interior and exterior traffic noise, operational noise, and construction noise impacts are all either less than significant or less than significant without the need for mitigation. Therefore, the proposed project would have a less than significant potential to result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of a project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

b. *Less Than Significant Impact* – Vibration is the periodic oscillation of a medium or object. The rumbling sound caused by vibration of room surfaces is called structure borne noises. Sources of groundborne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction

equipment). Vibration sources may be continuous or transient. Vibration is often described in units of velocity (inches per second), and discussed in decibel (dB) units in order to compress the range of numbers required to describe vibration. Vibration impacts related to human development are generally associated with activities such as train operations, construction, and heavy truck movements.

The Federal Transit Association (FTA) Assessment states that in contrast to airborne noise, ground-borne vibration is not a common environmental problem. Although the motion of the ground may be noticeable to people outside structures, without the effects associated with the shaking of a structure, the motion does not provoke the same adverse human reaction to people outside. Within structures, the effects of ground-borne vibration include noticeable movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. FTA Assessment further states that it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. However, some common sources of vibration are trains, trucks on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment. The FTA guidelines identify a level of 80 VdB for sensitive land uses. This threshold provides a basis for determining the relative significance of potential project related vibration impacts.

Construction Vibration Impacts

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is expected that ground-borne vibration from project construction activities would cause only intermittent, localized intrusion. Ground vibration levels associated with various types of construction equipment are summarized on Table XIII-13. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential project construction vibration levels using the following vibration assessment methods defined by the FTA. To describe the human response (annoyance) associated with vibration impacts the FTA provides the following equation: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$.

Table XIII-13
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	PPV (in/sec) at 25 Ft
Small bulldozer	0.003
Jackhammer	0.035
Loaded trucks	0.076
Large bulldozer	0.089

Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.

Table XIII-14 presents the expected typical construction equipment vibration levels at the nearest receiver locations. At distances ranging from 33 feet to 563 from typical project construction activities (at the project site boundary), construction vibration levels are estimated to range from 0.001 to 0.059 in/sec PPV at the nearest receiver locations. The project construction is not expected to generate vibration levels exceeding the City of Whittier maximum acceptable vibration standard of 0.30 in/sec PPV. Further, impacts at the site of the closest sensitive receiver are unlikely to be sustained during the entire construction period, but will occur rather only during the times that heavy construction equipment is operating proximate to the project site perimeter.

Table XIII-14
TYPICAL CONSTRUCTION EQUIPMENT VIBRATION LEVELS

Receiver Location[1]	Distance to Const. Activity (Ft)	Typical Construction Vibration Levels PPV (in/sec)[3]					Thresholds PPV (in/sec)[4]	Thresholds Exceeded
		Small Bulldozer	Jack-Hammer	Loaded Trucks	Large Bulldozer	Highest Vibration Level		
R1	352’	0.000	0.001	0.001	0.002	0.002	0.30	No
R2	563’	0.000	0.000	0.001	0.001	0.001	0.30	No
R3	225	0.000	0.001	0.003	0.003	0.003	0.30	No
R4	174’	0.000	0.002	0.004	0.005	0.005	0.30	No
R5	33	0.002	0.023	0.050	0.059	0.059	0.30	No

1 Construction receiver locations are shown on Figure XIII-4.
2 Distance from receiver location to project construction boundary.
3 Based on the Vibration Source Levels of Construction Equipment (Table XIII-13).
4 FTA Construction Noise and Vibration Manual, 2018.
5 Does the peak vibration exceed the acceptable vibration thresholds?
"PPV" = Peak Particle Velocity

Moreover, construction at the project site will be restricted to daytime hours consistent with City requirements thereby eliminating potential vibration impact during the sensitive nighttime hours. On this basis the potential for the project to result in exposure of persons to, or generation of, excessive ground-borne vibration is determined to be less than significant.

c. *No Impact* – The project is not located within an airport land use plan. The closest airport is the El Monte Airport located 6.9 miles north of the Project site. Given the large distance between the proposed project and nearby airports, project implementation would not expose people residing or working in the project area to excessive noise levels. There are no private airstrips located within two miles of the project site. Therefore, there is no potential to expose people residing or working in the project area to excessive noise levels due to the project location. No impacts will occur as a result of project implementation. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIV. POPULATION AND HOUSING: Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

SUBSTANTIATION

a. *Less Than Significant Impact* – The proposed Comstock Multi-Family Project would convert an office use located within the City of Whittier Uptown area zoned as Uptown Center use to a multi-family residential use within the same site. The project will develop an apartment building containing 52 dwelling units. The Southern California Association of Government (SCAG) 2020-2045 RTP/SCS Adopted Growth Forecast projects an estimated City population of 98,900 by the year 2045 (refer to the City's GPEIR), while the City had an estimated population of 87,100 persons in the year 2020. The SCAG 2019 Local Profile for the City of Whittier indicates that the average household size is 3.0 persons.[8] As such, the development of 52 multi-family housing units is anticipated to house a maximum of 156 persons. Given that the current population of the City of Whittier is about 11,800 persons less than the projected 2045 population, the potential for an additional 156 residents within the City of Whittier is considered less than significant as the project represents only about 1.3% of the potential growth anticipated between the present population and SCAG's projected 2045 population.

Additionally, according to the California Department of Finance, as of April 2020 there were approximately 29,591 housing units within the City of Whittier, while the SCAG 2020-2045 RTP/SCS projected an estimated 29,000 units in 2020, with an anticipated growth of 3,900 units by 2045, for a total of 33,500 housing units within the City in 2045. As such, the addition of 52 residential units would be well within the projected number of households that would be developed in the next 25 years. These units would contribute to the housing needs within the City, which, as determined by the SCAG Regional Housing Needs Assessment Final Allocation Plan approved on 3/22/21, modified 7/1/21,[9] was determined to be 3,439 units.[10] Given the above, the proposed project would not induce population growth beyond that which has been planned for in the City General Plan or SCAG planning documents, or that can be accommodated by the project and the City. Therefore, impacts would be less than significant. No mitigation is required.

b. *No Impact* – No occupied residential homes are located on the project site, and no persons currently occupy the site. Though the proposed project contains an office building that will be demolished, this facility does not serve as housing for any employees who work at the existing office building; therefore, implementation of the proposed project will not displace substantial numbers of existing

[8] https://scag.ca.gov/sites/main/files/file-attachments/whittier_localprofile.pdf?1606011132
[9] https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1625161899
According to SCAG, "the RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity, fair share housing needs."; The intent of the future needs allocation by income groups is to relieve the undue concentration of very low and low-income households in a single jurisdiction and to help allocate resources in a fair and equitable manner.
[10] http://www.scag.ca.gov/Documents/5thCyclePFinalRHNAplan.pdf;

housing or persons, necessitating the construction of replacement housing elsewhere. No impacts will occur; therefore, no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XV. PUBLIC SERVICES: Would the project 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:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

SUBSTANTIATION: Public Facilities are shown on the City's GPEIR Community Facilities Map provided as Figure XV-1 to this Initial Study.

a. *Less Than Significant Impact* – The City of Whittier is served by the Los Angeles County Fire Department (LACFD) for Emergency Medical Services (EMS), fire and rescue services, and safe haven services. The closest fire station to the proposed project site is Station #17, which is located 12006 Hadley Street just northwest of Uptown. According to the City's GPEIR, Station #17 is staffed daily with a four-person engine company consisting of one fire captain, one fire fighter specialist (engineer), and two fire fighters (Centeno, pers. comm. 2020). Also, the City's GPEIR map depicting fire stations and service area within the City (Figure XV-2) indicates that the proposed project is located within a one-mile service area distance from the nearest fire station(s).

The proposed project will incrementally add to the existing demand for fire protection services. Cumulative impacts are mitigated through the payment of the Development Impact Fee (DIF), and the City's GPEIR stipulates that, in the event that additional fire protection facilities and/or resources are needed in the City and Planning Area of the City, property tax growth would provide the City with the funding to meet new growth needs. As the proposed project would contribute property taxes to the general fund to offset this incremental demand for fire protection services, the proposed project would not contribute significant demand for fire protection services. Additionally, the City's GPEIR deems the compliance with Los Angeles County Fire Department requirements for fire sprinkler systems, fire alarm systems, fire flow, and equipment and firefighter access, as well as fire code requirements is sufficient to minimize fire protection impacts. Furthermore, given that the proposed project site is currently occupied with an office use served by existing fire protection services, the transfer of such demand to the proposed residential development would further minimize the incremental increase in demand created by the proposed project. As such, impacts under this issue are considered less than significant and no mitigation is required.

b. *Less Than Significant Impact* – The proposed project would be served by law enforcement services provided by the City of Whittier Police Department (WPD), which operates out of its headquarters adjacent to City Hall at 13200 Penn Street. The WPD also serves Santa Fe Springs. The City's GPEIR

identifies that WPD has 121 sworn officers and 54 civilian staff, and serves a population of about 106,000 persons, equal to about 1.7 law enforcement professionals per 1,000 residents. According to the GPEIR, the average response time for Priority One Calls—robbery, assault with a deadly weapon, traffic collisions with injuries, etc.—is 5 minutes and 12 seconds. The average response time for all other calls is 24 minutes and 13 seconds.

The proposed project will incrementally add to the existing demand for police protection services. These incremental impacts are mitigated through the payment of the DIF, and the City's GPEIR indicates that incremental demand on police protection services would be offset by increased property tax revenues which can be used for the maintenance and/or expansion of police protection facilities. Given the above, the proposed development of 52 units at the project site would not cause a significant additional demand on police protection services; in particular, given that the proposed project site is currently occupied with an office use served by existing police protection services, the transfer of such demand to the proposed residential development would further minimize the incremental increase in demand created by the proposed project. As such, impacts under this issue are considered less than significant and no mitigation is required.

c. *Less Than Significant Impact* – The proposed project would develop 52 multi-family apartment units, and would likely generate a new demand for school services within the project area. According to the City's GPEIR, the City and Planning Area are served by two high school (grades 9-12) districts and five elementary/middle school (grades K-8) districts. These seven districts operate a total of 48 schools with over 36,000 enrolled students although their boundaries are not coterminous with those of the Planning Area. Only 33 of the schools are located within the Planning Area. In addition to the numerous public schools, 25 private schools in the Planning Area served 4,095 students as of 2017. Additionally, Whittier College, which is within about a one-mile distance from the project site, is a private four-year liberal arts college with an undergraduate enrollment of 1,650 students. Half of the students live on campus and the other half live off campus in private housing around the college. A second college serves the Planning Area; Rio Hondo College, a community college, is located in the Puente Hills above Whittier. According to the City's GPEIR Districts and Schools Map provided as Figure XV-3, the proposed project is served by East Whittier Elementary School and Whittier Union High School, as well as Whittier City Middle School.

The City's GPEIR concludes that, while the proposed general plan update would result in increased residential and non-residential building area and a higher population in the Planning Area, the anticipated trends in declining student-per-dwelling rates are estimated to result in a decrease in the number of students in the Planning Area of approximately 1,733 students. As such, while the proposed project will create an additional demand on schools through the development of 52 new residences within the City, as the project fits within the context of the Envision Whittier General Plan, it's installation would not ultimately cause an incremental demand for school services that could not be accommodated within the confines of the existing schools, districts, and systems that are available at present. The proposed project would be required to pay the standard school mitigation fees that finance the construction and/or reconstruction of school facilities needed to accommodate students coming from new development. Payment of school impact fees is deemed sufficient to offset any impacts on schools caused by the proposed multi-family residential development. As such, impacts related to the need for new school facilities as a result of the proposed project would be less than significant, and no mitigation is required.

d. *Less Than Significant Impact* – The proposed project would develop 52 apartment units, and would likely generate a new demand for parks and recreation. However, the project does include the following park/recreation related and other amenities: a leasing office, clubhouse room, fitness room, work lounge, and an amenity decks. The proposed project is located within one-half mile walking distance to the nearest park according to the Envision Whittier General Plan Recreational Facilities and Access Map provided as Figure XV-4, which indicates that future residents of The Comstock Project would have relatively close access to area parks within walking distance to the project site.

The City's GPEIR indicates that the Whittier park system has 23 parks and the 4.5-mile Whittier Greenway Trail as well as a State-owned park and three Los Angeles County parks, which provides 3.32 acres of parkland per 1,000 residents in the City's Planning Area. This ratio meets the National Park and Recreation Association's guideline of 2.5–4.0 acres of parkland for every 1,000 residents. Additionally, the City's GPEIR concludes that all new dwelling units would be subject to DIF fees and the City's Quimby Ordinance, requiring dedication or in-lieu fees equivalent to three acres of parkland per 1,000 persons. As such, the proposed project would be subject to payment to these park funding mechanisms, which is deemed adequate to offset the incremental increase in demand for park facilities from implementation of the proposed project. Furthermore, given that the proposed project would increase the number of residents served by the City's park planning area by 156 persons, the proposed project would lower the City's park acreage per resident to 3.319, which is still deemed adequate by the City's parkland guideline of 2.5–4.0 acres of parkland for every 1,000 residents. Given that the proposed project would contribute DIF and Quimby Ordinance fees, and that it would not in and of itself reduce the acreage of parks available to residents of the City, the proposed project would have a less than significant impact under this issue. No mitigation is required.

e. *Less Than Significant Impact* – As stated above, the proposed project will install amenities, some of which may be considered other public facilities that will accommodate many of the project residents' needs. The City's GPEIR indicates that the Whittier Public Library collection includes over 230,000 items, annually circulates 450,000 items, and receives 750,000 hits on its website and electronic databases. The proposed project will incrementally add to the existing demand for library services. However, according to the City's GPEIR, the increase in use as a result of City build out would not be significant relative to citywide demand. As such, though the proposed project would contribute to this demand, the library services available within the Planning Area are sufficient to handle the demand for such resources. Impacts under this issue are less than significant and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVI. RECREATION:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

SUBSTANTIATION

a. *Less Than Significant Impact* – As addressed in the discussion under XIV, Population and Housing, and XV(d) above, the proposed project would develop 52 market-rate apartments, and as such may induce population, though not substantially. As stated in the discussion under Population and Housing, an estimated maximum 156 persons may reside at the new Comstock project site. The Comstock Project includes park- and recreation-like amenities that would support some of the new residents' park and recreation needs. These onsite amenities include: a leasing office, clubhouse room, fitness room, work lounge, and an amenity decks. The proposed project is located within one-half-mile walking distance to the nearest park according to the Envision Whittier General Plan Recreational Facilities and Access Map provided as Figure XV-4, which indicates that future residents of The Comstock Project would have relatively close access to area parks within walking distance to the project site that provide a full range of park and recreation amenities. The proposed project is also depicted within the one-half-mile walking distance radius of greenway trail service areas within the City (Figure XVI-1). Additionally, the proposed project will be required to comply with the payment of any required City Quimby Ordinance and DIF fees to enhance park and recreation facilities within the City. These parks and recreation funding mechanisms will offset the incremental increase in demand for park and recreation facilities from implementation of the proposed project. Thus, with the above provisions, the proposed project will not generate a substantial increase in residents of the City who would increase the use of existing recreational facilities. Therefore, any impacts under this issue are considered less than significant. No mitigation is required.

b. *Less Than Significant Impact* – The proposed project consists of 52 market-rate apartments in the City of Whittier. The project will not include any recreational facilities beyond those installed for resident and resident guest use only. The site currently contains an office and parking lot, with no existing recreational facilities on or near the project site, and is designated for specific plan use, which allows for multi-family residential uses in the Uptown Center zoning classification. As described throughout this Initial Study, the construction of the proposed Comstock Multi-Family Project would not cause a significant adverse physical effect on the environment under any issue. As a result, no recreational facilities beyond the minor facilities proposed to be provided for resident use only are required to serve the project, thus any impacts under this issue are considered less than significant. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVII. TRANSPORTATION: Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous inter-sections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

SUBSTANTIATION: The following section is based on the "Whittier Residential Vehicle Miles Travelled (VMT) Screening Evaluation and Trip Generation Assessment" (TGA/VMT) prepared by Urban Crossroads dated May 31, 2022. The TGA/VMT is provided as Appendix 13.

a. *Less Than Significant Impact* – Implementation of the proposed project will not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The proposed project is located at the southwest intersection of Philadelphia Street and Comstock Avenue. Philadelphia Street is delineated as a minor arterial roadway, and Comstock Avenue is secondary street serving the Uptown area within the City as shown on Figure XVII-1, Street Classifications, abstracted from the Envision Whittier General Plan.

The project is proposing to develop 52 multifamily residential dwelling units. The trip generation rates obtained from the latest Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021) for the proposed project use would result in an anticipated to 236 two-way trips per day with 19 AM peak hour trips and 20 PM peak hour trips. The City's Guidelines indicates that a localized transportation assessment must be prepared by a registered Civil or Traffic Engineer, or other qualified transportation professional. The localized transportation assessment is generally required if a project generates over 100 peak hour trips. As the proposed project is anticipated to generate fewer than 100 peak hour trips in the AM and PM peak hours (with no more than 20 peak hour trips in the PM peak hour), additional peak hour traffic operations analysis is not necessary based on the City's Guidelines, and therefore the project would have a less than significant potential to conflict with a program, plan, ordinance or policy addressing the circulation system.

The project will also generate construction traffic, which is temporary; during construction, the project is anticipated to generate no more than 50 truck roundtrips per day, and a maximum of 50 employee roundtrips per day; these trips will be spread throughout the day during construction. As such, no significant impacts on the automobile circulation system are anticipated over the short-term period of construction.

The project site is currently accessible by car, by adjacent sidewalk, but is not currently connected to adjacent streets with bike lanes. As stated under issue XVI, above, the proposed project is located within one-half-mile of the Whittier Greenway Trail (Figure XVI-1), and would not conflict with the adjacent pedestrian facilities in the project area. The nearest bike lane (Class III) access is at Greenleaf Avenue, which connects to the major bikeways within the City as shown on the Envision Whittier General Plan Map depicting Existing and Proposed Bike Facilities (Figure XVII-2). The site will continue to be accessible by the above means of transport once The Comstock Project has been developed, with enhanced access to the site through the new driveways.

According to the City's GPEIR, the City of Whittier is served by several transit providers: Metro, Norwalk Transit, Foothill Transit, Sunshine Shuttle, and Montebello Bus. The Envision Whittier General Plan Map depicting Transit Routes (Figure XVII-3) indicates that the proposed project is served by several routes, including the Montebello-10, Montebello-50, and therefore has access to the other major transit providers within the City. Furthermore, the proposed project site is located within the City's delineated Transit Priority Area (Figure XVII-4), which indicates that the provision of housing in this area would benefit future residents to enable access to alternative modes of transportation without conflicts to such transportation. The proposed project is not anticipated to conflict with the circulation of any alternative modes of transportation, and furthermore would have access to such services without conflicts.

Based on a review of the circulation in the vicinity of the Comstock Multi-Family Residential Project, the minimal peak hour traffic that would be generated over the short- and long-term by the proposed project, and the project's contribution to off- and on-site improvements to area roadways and sidewalks, would ensure that the proposed project would have a less than significant potential to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. No mitigation is required.

b. *Less Than Significant Impact* – Senate Bill 743 mandates that California Environmental Quality Act (CEQA) guidelines be amended to provide an alternative to Level of Service for evaluating transportation impacts. The amended CEQA guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Traveled (VMT) for transportation impact evaluation. Based on Governor's Office of Planning and Research (OPR)'s Technical Advisory, the City of Whittier adopted its City of Whittier Transportation Study Guidelines (October 2021) (City Guidelines), which documents the City's VMT analysis methodology and approved impact thresholds. The VMT screening evaluation presented in this report has been developed based on the adopted City Guidelines.

The City Guidelines provide details on appropriate screening criteria and thresholds that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed analysis. Screening thresholds are broken into the following six types:

- **Project Size Screening:** The City Guidelines indicate that projects generating fewer than 110 daily vehicle trips may be presumed to have a less than significant impact. The proposed project use would result in an anticipated to 236 two-way trips per day with 19 AM peak hour trips and 20 PM peak hour trips. For the purposes of VMT screening, the Project exceeds the 110 daily vehicle trips threshold.
  - **Project Size screening criteria is not met.**

- **Locally Serving Retail:** The City Guidelines identify that local serving retail less than 50,000 square feet or other local serving essential services (e.g., local parks, day care centers, public schools, medical/dental office buildings, etc.) are presumed to have a less than significant impact absent substantial evidence to the contrary. The Project does not propose to develop any locally serving retail.
  - **Locally Serving Retail screening criteria is not met.**

- **Low VMT Area Screening:** As noted in the City Guidelines, a residential or office project that is located in a Traffic Analysis Zone (TAZ) that is already 15% below the City and Sphere of Influence (SOI) Baseline VMT will tend to exhibit similarly low VMT. The City Guidelines provides a map of the City of Whittier+ SOI to locate areas of low VMT. The project site is located in an area 15% below the City average daily home-based VMT per capita.
  - **Low VMT Area screening criteria is met.**

- **Transit Proximity:** Consistent with guidance identified City Guidelines, Projects that are located within a ½ mile of the Eastside Transit Corridor Phase 2 Project, or a ½ mile of where two or

more 15-minute (during commute hours) bus routes intersect or within a ½ mile of a corridor served by 15-minute (during commute hours) bus service. In addition, the project should have the following characteristics:

- A Floor Area Ratio (FAR) of 0.75 or greater
- Is consistent with the applicable SCAG Sustainable Community Strategy (SCS) (as determined by the City)
- Does not provide more parking than required by the City
- Does not replace affordable housing units

The Project's location is presented in Attachment B, which shows existing and planned future TPA areas for both bus and rail service within the City. The Project site is located within a TPA based on bus service. However, further examination shows that the Montebello Bus Lines have reduced the frequency of service above 15-minute service intervals during commute hours and the City of Whitter no longer has any transit eligible areas for screening purposes.

- **Transit Proximity screening criteria is not met.**

- **Transportation Facilities:** he City Guidelines identify Transportation projects that promote non-auto travel, improve safety, or improve traffic operations at current bottlenecks, such as transit, bicycle and pedestrian facilities, intersection traffic control (e.g., traffic signals or roundabouts), or widening at intersections to provide new turn lanes. The Project will not be developing a transportation project.
  - **Transportation Facilities screening criteria is not met.**

- **Affordable Housing:** City Guidelines state that residential projects that provide affordable housing units; if part of a larger development, the affordable housing units only satisfy the screening criteria. The Project does not intend to include any affordable housing units.
  - **Affordable Housing screening criteria is not met**

A land use project need only to meet one of the above screening thresholds to result in a less than significant VMT impact.

In addition to the above, the proposed Comstock Multi-Family Project is located in an area that connects to alternative modes of transportation, such as sidewalks, bike paths, and bus route, making the area in the vicinity of the project accessible to alternative modes of transportation. Therefore, in accordance with the VMT thresholds and the analysis above and contained within Appendix 13, the Comstock Project is not anticipated to result in significant impact related to vehicle miles travelled, and thus would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts under this issue are considered less than significant.

c. *Less Than Significant Impact* – The proposed project will occur entirely within the project site boundaries, as site access is already provided because the site is developed as an office with associated parking lot. Large trucks delivering equipment or removing small quantities of excavated dirt or debris can enter the site without major conflicts with the flow of traffic on the roadways used to access the site. Primary access to the site will be provided along the alley way that intersects with Philadelphia Street on the western boundary of the site. As stated above, Philadelphia Street is delineated as a minor arterial roadway, and Comstock Avenue is a secondary street serving the Uptown area within the City as shown on Figure XVII-1, Street Classifications, abstracted from the Envision Whittier General Plan; these roadways are moderate-to heavily travelled roadways within the City. However, the alley provides access to the properties along Comstock Avenue between Philadelphia Street and Wardman Street to the south. As the proposed project will be designed to avoid impacting major roadways, site access has been designed such that the project would not increase hazards due to a geometric design feature or incompatible uses, and as such construction traffic is not anticipated to result in any conflicts with the surrounding roadways. Additionally, the proposed project would be required to comply with all applicable fire code and ordinance

requirements for construction and access to the site. Emergency response and evacuation procedures would be coordinated with the City and the County, as well as the police and fire departments. In the long term, no impacts to any hazards or incompatible uses in existing or planned roadways are anticipated. Operation of the proposed project would be similar to the surrounding uses, and the design of the project would not create any hazards to surrounding roadways. Thus, any impacts are considered less than significant without the need for added mitigation.

d. *Less Than Significant Impact* – The proposed project consists of activities that will take place along Philadelphia Street and Comstock Avenue within the City of Whittier in the County of Los Angeles. Vehicles travelling to and from the project site would utilize Philadelphia Street and Comstock Avenue, the adjacent alley, as well as Wardman Street to access the site. Primary access to the site will be provided by the alley, which ensures that the residents do not conflict with traffic along Philadelphia Street and Comstock. Access to the site is adequate and the nearest emergency response station is located within a one-mile service area radius for the nearest fire stations (refer to Figure XV-2). The proposed project would not conflict with a nearby evacuation route, particularly given that the project site is accessible via an alley that provides access primarily to uses along Comstock Avenue between Philadelphia Street and Wardman Street to the south. The project will comply with City and fire requirements for emergency access, which the City's GPEIR determined is adequate, in conjunction with the City's development review process, to ensure that the proposed project would not hinder emergency access within the project site once The Comstock Project has been developed. Thus, because of the lack of adverse impact on local circulation a less than significant potential for significant impacts on emergency access are forecast to occur during construction and operation. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVIII. TRIBAL CULTURAL RESOURCES: Would the project cause a substantial change in the significance of tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to the California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in sub-division (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

SUBSTANTIATION

A Tribal Resource is defined in the Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1;
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purpose of this paragraph, the lead agency shall consider the significance of the resources to a California American tribe;
- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape;
- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal resource if it conforms with the criteria of subdivision (a).

Impact Analysis

a&b. *Less Than Significant With Mitigation Incorporated* – Pursuant to Senate Bill 18 (SB18), Government Code §65352.3 and §65352.4 require local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans and Community Plans. As the Comstock Multi-Family Project involves amendments to the Uptown Whittier Specific Plan, it is subject to compliance with SB18. On November 4, 2021,

the Native American Heritage Commission (NAHC) provided a list of nine tribes to the City of Whittier that required notification. The tribes were as follows:

- Gabrieleño Band of Mission Indians - Kizh Nation Andrew Salas, Chairperson
- Gabrieleño/Tongva San Gabriel Band of Mission Indians – Anthony Morales, Chairperson
- Gabrielino /Tongva Nation - Sandonne Goad, Chairperson
- Gabrielino Tongva Indians of California Tribal Council - Robert Dorame, Chairperson
- Gabrielino Tongva Indians of California Tribal Council - Christina Conley, Tribal Consultant and Administrator
- Gabrielino-Tongva Tribe - Charles Alvarez
- Santa Rosa Band of Cahuilla Indians - Lovina Redner, Tribal Chair
- Soboba Band of Luiseño Indians - Isaiah Vivanco, Chairperson
- Soboba Band of Luiseño Indians - Joseph Ontiveros

On November 16, 2021, the City of Whittier sent letter to the nine tribes. On November 29, 2021, the Gabrieleño Band of Mission Indians responded that they were in agreement with the Specific Plan Amendment and that their tribal government would like to request consultation for any and all future projects when ground disturbance will be occurring within this location. No responses were received from the remaining eight tribes during the 90-day comment period. Pursuant to the requirement of the California Government Code Section 65352, an additional 45-day comment period will begin on Friday, June 24, 2022, and will end on Tuesday, August 9, 2022.

The City has contacted two Tribes under Assembly Bill (AB) 52: the Gabrieleño Band of Mission Indians and the Soboba Band of Luiseño Indians. The tribes were contacted to initiate the AB-52 process on October 29, 2021 to notify the tribes of the proposed project through mailed letters. On November 1, 2021 during the 30-day consultation period, the Gabrieleño Band of Mission Indians (Gabrieleño Band) was the only tribe to respond. Consultation with the Gabrieleño Band occurred on January 7, 2022. A letter to proceed with the project was sent to the Soboba Band of Luiseño Indians on April 7, 2022, as the City of Whittier did not receive a request to consult on this project within the 30 days specified as part of California Public Resources Code § 21080.3.1.

The Gabrieleño Band requested that mitigation be incorporated to ensure protection of potential tribal cultural resources within the project site, as such the following mitigation shall be implemented:

TCR-1 Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground- disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the Lead Agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts,

conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for The project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to The project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the including for educational, cultural and/or historic purposes.

TCR-2 Unanticipated Discovery of Human Remains and Associated Funerary Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles

County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

TCR-3 Procedures for Burials and Funerary Remains:

A. As the Most Likely Descendant (MLD), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient times, as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The

Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

The above mitigation measures will ensure that a Native American monitor is available to monitor the site and to recover unearthed tribal cultural resources, and ultimately to ensure appropriate treatment of such resources, which is sufficient to ensure protection of such resources by the Gabrieleño and City standards. Furthermore, the above mitigation measures would ensure appropriate procedures are followed in the event of the unanticipated discovery of human remains and associated funerary objects, including procedures for burials and funerary remains treatment. Ultimately, the implementation of the above measures would prevent significant adverse impacts to tribal cultural resources, and impacts under this issue are considered less than significant with mitigation. No further mitigation is required beyond that which was identified under Section V, Cultural Resources, above.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☒	☐	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☒	☐	☐

SUBSTANTIATION: Will Serve Letters are provided for each of the Utilities that will serve the proposed project in Appendix 14.

a. Water

Less Than Significant Impact – Water will be provided by the City of Whittier. Water service is available through a connection located adjacent to and within the project site, as the existing office use is currently connected to the City's water service. However, the proposed project will require new connections to the City's water service, as shown on page 23 "Preliminary Water and Sewer Plan" of the Project Plans provided as Appendix 1a to this Initial Study. These new connections include a proposed 2" irrigation connection to the existing water main, a new 4" domestic water service connection, and a new 2" fire service connection. The project would be supplied with water by City, which uses groundwater and recycled water to serve the City's residents and businesses to meet customer demand. As previously stated under Section X, Hydrology and Water Quality, the City's Urban Water Management Plan (2020) identifies sufficient water resources to meet demand in its service area, though the City's GPEIR indicates that at City build-out, there may be a deficiency in supply versus demand. The City's GPEIR provides a mitigation measure preventing development that would exceed the UWMP's 2040 projections for available water supply. The overall available water supply is anticipated to meet demand, which indicates that the City has available capacity to serve the proposed project without significant adverse impacts on area groundwater basins. Therefore, development of the Comstock Multi-Family Project would not result in a significant environmental effect related to the relocation or construction of new or expanded water facilities. Impacts are less than significant.

Wastewater

Less Than Significant Impact – Wastewater collection will be provided by City of Whittier owned, operated, and maintained wastewater collection system that deliver municipal wastewater to the Sanitation Districts of Los Angeles County (LACSD) and the project will connect to the sewer main adjacent to the project site. As such, the project would connect to the City's existing wastewater collection system within the adjacent alley as shown on page 23 "Preliminary Water and Sewer Plan" of the Project Plans provided as Appendix 1a to this Initial Study. The proposed project would install an internal wastewater collection system to convey sewage generated by residents of the Comstock Multi-Family Project, the development of which is not anticipated to cause a significant impact. Therefore, development of the Comstock Multi-Family Project would not result in a significant environmental effect related to the relocation or construction of new or expanded wastewater facilities. Impacts are less than significant.

Stormwater

Less Than Significant Impact – The surface runoff from the site, nonpoint source storm water runoff, will be managed in accordance with the WQMP as discussed in the Hydrology and Water Quality Section (Section X) of this Initial Study. Onsite flows will be collected through biofiltration planters located at the southern and western boundaries of the site. This system will be designed to capture the peak flows above the 100-year flow runoff from the project site or otherwise be detained on site and discharged in conformance with Los Angeles County requirements. Therefore, surface water will be adequately managed on site and as such, development of the Comstock Multi-Family Project would not result in a significant environmental effect related to the relocation or construction of new or expanded stormwater facilities. Impacts are less than significant.

Electric Power

Less Than Significant Impact – Southern California Edison (SCE) will provide electricity to the site and the power distribution system located adjacent to the site will be able to supply sufficient electricity. Furthermore, the existing use at the project site is currently served with sufficient electricity and is therefore already connected to SCE's system. The effort to connect to the existing electrical system, and to install electricity connections within the project site to serve future residents of the Comstock Multi-Family Project with electricity is not anticipated to result in significant impacts, as evidenced by the discussions in preceding sections. Therefore, development of the Comstock Multi-Family Project would not result in a significant environmental effect related to the relocation or construction of new or expanded electric power facilities. Impacts are less than significant.

Natural Gas

Less Than Significant Impact – Natural gas will be supplied by Southern California Gas. The site may require a connection to the existing natural gas line adjacent to the project site. The effort to connect to the existing gas line within the adjacent roadway, and to install natural gas lines within the project site to serve future residents of the Comstock Multi-Family Project with natural gas is not anticipated to result in significant impacts, as evidenced by the discussions in preceding sections. Therefore, development of the Comstock Multi-Family Project would not result in a significant environmental effect related to the relocation or construction of new or expanded natural gas facilities. Impacts are less than significant.

Telecommunications

Less Than Significant Impact – Development of the Comstock Multi-Family Project would require a connection to telecommunication services, such as wireless internet service and phone service. This can be accomplished through connection to existing services that are available to the developer at the project site, particularly given that existing telecommunication service exists at the project site at present in service of the existing use. Therefore, development of the Comstock Multi-Family Project would not result in a significant environmental effect related to the relocation or construction of new or expanded telecommunications facilities. Impacts are less than significant.

b. *Less Than Significant Impact* – Please refer to the discussion under Hydrology, Section X(b) above. The Comstock Multi-Family Project is a multi-family residential project that will consist of 52 dwelling units. The project would be supplied with water by the City of Whittier that uses groundwater to meet primary customer demand. Based on a review of the City's Urban Water Management Plan (UWMP, 2020) it can be assumed that this project, which would contribute an additional 52 dwelling units to the City's housing stock, would demand about 9.63 AF of water per year (AFY)(0.185 AFY x 52 units = 9.63 AFY). Based on the projected water demand for Multi-Family Residential uses within the City's service area for 2025, 1,758 AFY, and for 2045, 1,919 AFY, it is anticipated that the 9.93 AFY demand can be accommodated into the future, particularly given that the overall available water supply is anticipated to meet demand, which indicates that the City has available capacity to serve the proposed project without significant adverse impacts on area groundwater basins. The City GPEIR provides MM **UTIL-1**, which prevents future development from occurring where the development would demand water in excess of what is identified for supply in 2040 under the most recent UWMP. As such, given that the proposed project would not generate demand for water from the City that would exceed the projections for the available water supply available during normal, dry and multiple dry years. Impacts under this issue are considered less than significant.

c. *Less Than Significant Impact* – The LACSD master plans for wastewater treatment and disposal services are based on the land uses and growth projections in the general plans of the various partner agencies of the LACSD, including the 1993 City of Whittier General Plan. The City's GPEIR projects that future residents will generate 75 gallons of wastewater per day. As the proposed project would create 52 new residential units, and with a person per dwelling unit rate of 3, the proposed project residents (156 persons) would generate an estimated 11,700 gallons per day (gpd) of wastewater. According to the City's GPEIR, the LACSD Joint Water Pollution Control Plant (JWPCP) has a capacity of 400 million gallons per day (MGD) and currently processes an average flow of 259.7 MGD, and the Los Coyotes Water Reclamation Plant (LCWRP) has a capacity of 37.5 MGD and currently processes an average flow of 21.3 MGD. The additional projected wastewater generated by the proposed project would be well within the additional capacities of area wastewater treatment plants. Additionally, the City has plans to and is in the process of upgrading and expanding its wastewater collection system to meet existing and future demand. Given the above, it is anticipated that there will be available capacity to accommodate the demand generated by the proposed project. Impacts under this issue are less than significant.

d&e. *Less Than Significant With Mitigation Incorporated* – The proposed project will generate demand for solid waste service system capacity and has a potential to contribute to potentially significant cumulative demand impacts on the solid waste system. Solid waste generation rates estimated by CalRecycle[11] suggest that multi-family residential uses such as that which this project proposes can produce about 4 pounds of refuse per dwelling unit per day. It is estimated that 52 market rate apartment units would generate about 208 pounds per day or 37.96 tons per year (4 x 52 x 365 = 75,920 pounds per year / 2,000 = 37.96 tons per year). According to the City's GPEIR, the City currently complies with the waste reduction requirements of AB 341. As such, combined with the City's mandatory source reduction and recycling program, the proposed project is not forecast to cause a significant adverse impact to the waste disposal system due to the available capacities at nearby landfills.

Solid waste will be disposed of in accordance with existing regulations at an existing licensed landfill. The solid waste will be disposed of in accordance with existing regulations at an existing licensed landfill—such as the Savage Canyon Landfill, which has a maximum daily permitted throughput of 3,350 tons per day, and a remaining capacity of 9,510,833 cubic yards (CY), located at 13919 East Penn Street Whittier, CA 90602.[12] As the proposed project complies with the City's General Plan, and conforms to the planning projections therein, the City's GPEIR indicates that future demand on solid waste facilities would be less than significant, particularly given that available capacities exist at

[11] https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates
[12] https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3494?siteID=1399

area landfills, and that the proposed project would generate a nominal estimated 208 pounds per day, which is greater than that which is estimated to be generated at the existing medical office on site by only about 165 pounds per day.

In addition to operational waste, the proposed project would generate construction waste from the demolition of the 7,172 SF office on site, and the adjacent concrete and asphalt within the parking lot. Any construction and demolition (C&D) waste will be recycled to the maximum extent feasible and any residual materials will be delivered to one of several C&D disposal sites in the area surrounding the project site. Many of these C&D materials can be reused or recycled, thus prolonging the supply of natural resources and potentially saving money in the process. The proposed project would require demolition that is anticipated to generate approximately 3,000 CY of C&D waste. As such, it is assumed that about 200 15-yard dumpsters or about 75 40-yard dumpsters would be required in a given year in support of the construction and demolition efforts anticipated to be required to develop The Comstock Project. Construction waste reduction/diversion would be the focus of recycling/reuse. Because of increased construction recycling efforts resulting from CalGreen and other regulations, opportunities for construction recycling are becoming easier to find, as evidenced by the number of facilities listed on the Construction and Demolition Debris Recycling Facilities list for Los Angeles County.[13] These facilities accept materials such as: appliances, cardboard, metals, wood, asphalt, concrete, soil, block rock, brick, carpet and padding, concrete with rebar, drywall, gravel, rock, roof tile, and tile.

The facilities that accept C&D materials, combined with the landfills in the surrounding area, have adequate capacity to serve the proposed project construction and operations. Solid waste will be disposed of in accordance with existing regulations at an existing licensed landfill, such as the Savage Canyon Landfill.

Any hazardous materials collected on the project site during either construction or operation of the project will be transported and disposed of by a permitted and licensed hazardous materials service provider. Therefore, the project is expected to comply with all regulations related to solid waste under federal, state, and local statutes. To further reduce potential impacts to solid waste facilities due to the large scale of the materials that may require disposal or recycling, the following mitigation measure will be implemented:

UTIL-1 ***The contract with demolition and construction contractors shall include the requirement that all materials that can be recycled shall be salvaged and recycled. This includes, but is not limited to, wood, metals, concrete, road base, and asphalt. The developer shall submit a recycling plan to the City for review and approval prior to the start of demolition/construction activities to accomplish this objective.***

Therefore, with the above mitigation measure, the project is expected to comply with all regulations related to solid waste under federal, state, and local statutes and be served by a landfill(s) with sufficient permitted capacity to accommodate the project's solid waste disposal needs. No further mitigation is necessary.

[13] https://pw.lacounty.gov/epd/CD/cd_attachments/Recycling_Facilities.pdf

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XX. WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

SUBSTANTIATION

a. *Less Than Significant Impact* – The proposed project is not located within a Very High Fire Hazard Severity Zone in a Local Responsibility Area (LRA) or State Responsibility Area (SRA), shown on Figure IX-3. Please review the discussion under Subchapter IX(g), Hazards and Hazardous Materials. The project is located within an urban area, and is already at present developed with a medical office and associated parking lot. The proposed project site is not located in an area that has been delineated as being located within any fire risk by CALFIRE (Figure XX-1), nor is the project located within an area delineated within historical fire perimeters (Figure IX-3). Furthermore, as a fully developed site, the project site does not contain a heavy vegetative fuel load. The City of Whittier reviews all proposed projects and provides conditions of approval for setbacks; building and fire sprinkler requirements; roofing design and material and construction requirements, fuel modification; and other measures as appropriate to reduce the risk to the development and surrounding uses to fire hazards. Furthermore, given the urban setting within which the project is located and the ease of access to local roadways, it is not anticipated that the development of the Comstock Multi-Family Project within the project site would substantially impair an adopted emergency response or evacuation plan.

b. *Less Than Significant Impact* – The proposed project is characterized by essentially flat topography that has been disturbed as a result of existing development on the site, which includes a medical office building and associated parking lot. The potential for significant exposure of site occupants to pollutant concentrations from a wildfire would be minimal. The project site itself is not anticipated to be exposed to wildfire because the site will not contain any features which are highly flammable, which will minimize fire risk at the site. Based on the site location, and the condition of the site and surrounding area, the project will have a less than significant potential to exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. No mitigation is required.

c. *Less Than Significant Impact* – The project will require associated infrastructure in support of The Comstock Project operations/occupancy as follows: the project will require additional connection to the City's Water service area; the project will require new wastewater connection to the sewer lines

within the alley adjacent to the project site; electricity provided by SCE exists at the site at present; the site may connect to the existing natural gas line within the alley adjacent to the project site. This Uptown area of the City of Whittier is developed, and the project site is surrounded by development in all directions. Therefore, the project would not have a significant potential to exacerbate wildfire risk or to result in temporary or ongoing impacts to the environment. Impacts under this issue are considered less than significant.

d. *Less Than Significant Impact* – The discussion under Section VII, Geology and Soils, concluded that the project would not have a significant potential to experience landslides or slope instability. Once constructed, the project site will remain essentially flat, and the drainage will be managed in an efficient manner that would not expose people or structures to significant risk. Furthermore, as discussed under Section X, Hydrology and Water Quality, the project is not located in an area containing a flood hazard, and the project site is anticipated to remain stable should a wildfire occur at or near the project site. As discussed above, the project is not anticipated to be exposed to substantial fire risk because of the lack of fuel to spread wildfire surrounding the site. Therefore, the development of the Comstock Multi-Family Project at this site is anticipated to have a less than significant potential to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XXI. MANDATORY FINDINGS OF SIGNIFICANCE:				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

SUBSTANTIATION: The analysis in this Initial Study and the findings reached indicate that the proposed project can be implemented without causing any new project specific or cumulatively considerable unavoidable significant adverse environmental impacts. Mitigation is required to control certain potential environmental impacts of the proposed project to a less than significant impact level. The following findings are based on the detailed analysis contained within this Initial Study of all environmental topics and the implementation of the mitigation measures identified in the previous text and summarized following this section.

a. *Less Than Significant With Mitigation Incorporated* – The project has no potential to cause a significant impact on any biological or cultural resources. The project has been identified as having no potential to degrade the quality of the natural environment, substantially reduce habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The project requires mitigation to prevent significant impacts from occurring to nesting birds as a result of implementation of the project, but no other resources would be impacted by the proposed project, and thus no other biological resource issues require mitigation. Based on the historic disturbance of the site, and its current disturbed condition, the potential for impacting cultural resources is low. The Cultural Resources Report determined that, while the existing structure on site was constructed in 1952, it has no distinguishing features that would render it eligible for listing in the California Register of Historical Resources. As such, no other cultural resources of importance were found at the project site, so it is not anticipated that any resources could be affected by the project because no cultural resources exist. However, because it is not known what could be accidentally exposed upon any excavation activities, contingency mitigation measures are provided to ensure that, in the unlikely event that any resources are found, they are protected from any potential impacts. Please see biological and cultural sections of this Initial Study.

b. *Less Than Significant With Mitigation Incorporated* – Based on the analysis in this Initial Study, the proposed Comstock Multi-Family Project has the potential to cause impacts that are individually or cumulatively considerable. The proposed multi-family residential development would contribute to cumulative impacts as a result of the resources required to support the demands of the new residents

of The Comstock Project. However, the proposed project's contribution to such cumulative impacts would not be cumulatively considerable. The issues of Aesthetics, Air Quality, Biology, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Tribal Cultural Resources, and Utilities and Service Systems require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure that cumulative effects are not cumulatively considerable. All other environmental issues were found to have no significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed project have been determined to be less than considerable and thus, would result in a less than significant cumulative impact.

c. *Less Than Significant With Mitigation Incorporated* – The proposed project includes activities that have a potential to cause direct substantial adverse effects on humans. The issues of Air Quality, Geology and Soils, Hazards and Hazardous Materials, and Noise require the implementation of mitigation measures to reduce human impacts to a less than significant level. All other environmental issues were found to have no significant impacts on humans without implementation of mitigation. The potential for direct human effects from implementing the proposed project have been determined to be less than significant with mitigation.

Conclusion

This document evaluated all CEQA issues contained in the Initial Study Checklist form. The evaluation determined that either no impact or less than significant impacts would be associated with the issues of Agricultural and Forestry Resources, Energy, Greenhouse Gas Emissions, Land Use and Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation, and Wildfire. The issues of Aesthetics, Air Quality, Biology, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Tribal Cultural Resources, and Utilities and Service Systems require the implementation of mitigation measures to reduce impacts to a less than significant level. The required mitigation has been proposed in this Initial Study to reduce impacts for these issues to a less than significant impact.

Based on the findings in this Initial Study, the City of Whittier proposes to adopt a Mitigated Negative Declaration (MND) for the Comstock Multi-Family Project. A Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) will be issued for this project by the City. The Initial Study and NOI will be circulated for 30 days of public comment). At the end of the 20-day review period, a final MND package will be prepared and it will be reviewed by the City for possible adoption at a future public hearing on July 18, 2022. If you or your agency comments on the MND/NOI for this project, you will be notified about the meeting date in accordance with the requirements in Section 21092.5 of CEQA (statute).

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*,(1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors*, (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; San *Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

Revised 2019
Authority: Public Resources Code sections 21083 and 21083.09
Reference: Public Resources Code sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3/ 21084.2 and 21084.3

SUMMARY OF MITIGATION MEASURES

Aesthetics

AES-1 The Applicant shall obtain City approval to remove any trees on site through tree removal permit(s). The Applicant shall obtain a tree removal permit pursuant to City of Whittier Municipal Code 12.40.

Air Quality

AQ-1 Require the use of Tier 4 emissions standards or better for off-road diesel-powered construction equipment of 50 horsepower or greater. To ensure that Tier 4 construction equipment or better will be used during the proposed project's construction, South Coast Air Quality Management District (SCAQMD) staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and California Air Resources Board (CARB) or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency shall require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance and conduct regular inspections to the maximum extent feasible to ensure compliance.

AQ-2 Require zero-emissions or near-zero emission on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export) that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. The Lead Agency shall include this requirement in applicable bid documents, purchase orders, and contracts. The construction contractor shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The City shall conduct regular inspections to the maximum extent feasible to ensure compliance.

AQ-3 All trucks hauling dirt, sand, soil or other loose materials are to be covered, or should maintain at least two feet of freeboard in accordance with California Vehicle Code Section 23114 (freeboard means vertical space between the top of the load and top of the trailer).

AQ-4 Enter into applicable bid documents, purchase orders, and contracts to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy. For any idling that is expected to take longer than five minutes, the engine shall be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the proposed project site. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed project site, where appropriate, stating that idling longer than five minutes is not permitted.

AQ-5 The contractor shall adhere to applicable measures contained in Table 1 of Rule 403 including, but not limited to:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered at least three (3) times daily during dry weather. Watering, with

complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.
- All access points to the project site shall have track out devices installed.
- The contractor shall ensure that traffic speeds on unpaved roads and project site areas are limited to 15 mph or less.

AQ-6 The project applicant shall require that all building structures meet or exceed 2016 Title 24, Part 6 Standards and meet Green Building Code Standards.

AQ-7 The project applicant shall require that all faucets, toilets and showers installed in the proposed structures utilize low-flow fixtures that would reduce indoor water demand by 20% per CalGreen Standards.

AQ-8 The project applicant shall require that a water-efficient irrigation system be installed that conforms to the requirements of City codes.

AQ-9 The project applicant shall require that ENERGY STAR-compliant appliances are installed on-site.

AQ-10 The project applicant shall require that high-efficiency lighting be installed that is at least 34% more efficient than standard lighting.

AQ-11 No wood burning devices shall be installed in any dwelling units consistent with SCAQMD Rule 445.

Biological Resources

BIO-1 The State of California prohibits the "take" of active bird nests. To avoid impacts to nesting birds (common and special status) during the nesting season (generally between February 1 to August 31), a qualified Avian Biologist shall conduct pre-construction nesting bird survey prior to project-related disturbance to identify any active nests. If no active nests are found, no further action would be required. If an active nest is found, the biologist shall set appropriate no-work buffers around the nest, which would be determined based on the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.

Cultural Resources

CUL-1 Should any cultural resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with the City. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.

Geology and Soils

GEO-1 Based upon the preliminary geotechnical investigation, all of the recommended seismic design parameters shall be implemented by the Applicant. Implementation of these specific measures will address all of the identified geotechnical constraints identified at project site, including seismic soil stability on future project-related structures.

GEO-2 Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. If covering is not feasible, then measures such as the use of straw bales or sandbags shall be used to capture and hold eroded material on the project site for future cleanup such that erosion does not occur.

GEO-3 All exposed, disturbed soil (trenches, stored backfill, etc.) shall be sprayed with water or soil binders twice a day, or more frequently if fugitive dust is observed migrating from the site within which the Comstock Multi-Family Project is being constructed.

GEO-4 Based upon the Preliminary Geotechnical Investigation, all of the recommended design parameters shall be implemented by the Applicant. Implementation of these specific measures will address all of the identified geotechnical constraints identified at project site, including subsidence.

GEO-5 Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the City's onsite inspector. The paleontological professional shall assess the find, determine its significance, and determine appropriate mitigation measures within the guidelines of the California Environmental Quality Act that shall be implemented to minimize any impacts to a paleontological resource.

Hazards and Hazardous Materials

HAZ-1 Prior to and during grading and construction, should an accidental release of a hazardous material occur, the following actions will be implemented: construction activities in the immediate area will be immediately stopped; appropriate regulatory agencies will be notified; immediate actions will be implemented to limit the volume and area impacted by the contaminant; the contaminated material, primarily soil, shall be collected and removed to a location where it can be treated or disposed of in accordance with the regulations in place at the time of the event; any transport of hazardous waste from the property shall be carried out by a registered hazardous waste transporter; and testing shall be conducted to verify that any residual concentrations of the accidentally released material are below the regulatory remediation goal at the time of the event. All of the above sampling or remediation activities related to the contamination will be conducted under the oversight of Los Angeles County Certified Unified Program Agency (CUPA) Site Mitigation Unit (SMU). All of the above actions shall be documented and made available to the appropriate regulatory agencies prior to closure (a determination of the regulatory agency that a site has been remediated to a threshold that poses no hazard to humans) of the contaminated area.

Hydrology and Water Quality

HYD-1 The project proponent will select best management practices from the range of practices identified by the City and reduce future non-point source pollution in surface water runoff discharges from the site to the maximum extent practicable, both during construction and following development. The Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP) shall be submitted to the City for review and approval prior to ground disturbance and the identified BMPs installed in accordance with schedules contained in these documents.

Tribal Cultural Resources

TCR-1 Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground- disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
B. A copy of the executed monitoring agreement shall be submitted to the Lead Agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.
D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for The project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to The project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.
E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the including for educational, cultural and/or historic purposes.

TCR-2 Unanticipated Discovery of Human Remains and Associated Funerary Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.
C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)
E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.
F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

TCR-3 Procedures for Burials and Funerary Remains:

A. As the Most Likely Descendant (MLD), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient times, as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.
B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.
C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.
D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.
E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.
F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.
G. The Tribe will work closely with the project’s qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final

report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

Utilities and Service Systems

UTIL-1 The contract with demolition and construction contractors shall include the requirement that all materials that can be recycled shall be salvaged and recycled. This includes, but is not limited to, wood, metals, concrete, road base, and asphalt. The developer shall submit a recycling plan to the City for review and approval prior to the start of demolition/construction activities to accomplish this objective.

REFERENCES

California Department of Fish and Wildlife, "California Natural Diversity Database (CNDDB)" generated on November 30, 2021

CRM TECH, "Historic-Period Building Evaluation for Former Security-First National Bank Building, 12826 Philadelphia Street, Whittier, California" dated January 14, 2022, Revised June 9, 2022

Jim Borer, Certified Arborist #496, "Existing Tree Inspection Report, 18282 Philadelphia Street, Whittier, CA" dated January 3, 2022

KHR Associates, "Preliminary Low Impact Development Plan (LID) The Comstock" dated June 13, 2022 (revised)

LGC Geotechnical, Inc., "Preliminary Geotechnical Evaluation and Recommendations, Proposed Multi-Family Residential Development located at the Intersection of Philadelphia Street and Comstock Avenue, Whittier, California" dated May 17, 2021

Moule & Polyzoides, Architects and Urbanists, "Uptown Whittier Specific Plan" Approved November 18, 2008; Amended June 24, 2014

PIC Environmental Services, "Phase I Environmental Site Assessment Report Concerning Commercial Property at 12826-12856 Philadelphia Street, Whittier, California" dated January 26, 2021

PIC Environmental Services, "Phase II Site Assessment Geologic Report Concerning Commercial Property at 12826-12856 Philadelphia Street, Whittier, California" dated March 17, 2021

Urban Crossroads, "Whittier Residential Air Quality Impact Analysis" dated June 21, 2022

Urban Crossroads, "Whittier Residential Energy Analysis" dated June 21, 2022

Urban Crossroads, "Whittier Residential Greenhouse Gas Analysis" dated June 21, 2022

Urban Crossroads, "Whittier Residential Noise Impact Analysis" dated January 13, 2022

Urban Crossroads, "Whittier Residential Vehicle Miles Travelled (VMT) Screening Evaluation and Trip Generation Assessment" dated May 31, 2022

U.S. Fish and Wildlife Service, "IPaC Trust Resources Report" generated on November 30, 2021

City of Whittier, "Envision Whittier Draft General Plan" dated June 2021

City of Whittier, "General Plan Update and Housing Element Update Draft Environmental Impact Report" dated July 9, 2021

Websites

https://scag.ca.gov/sites/main/files/file-attachments/whittier_localprofile.pdf?1606011132
https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management
https://scag.ca.gov/sites/main/files/file-attachments/whittier_localprofile.pdf?1606011132
https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1625161899
http://www.scag.ca.gov/Documents/5thCyclePFinalRHNAplan.pdf
https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates
https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3494?siteID=1399
https://pw.lacounty.gov/epd/CD/cd_attachments/Recycling_Facilities.pdf

FIGURES

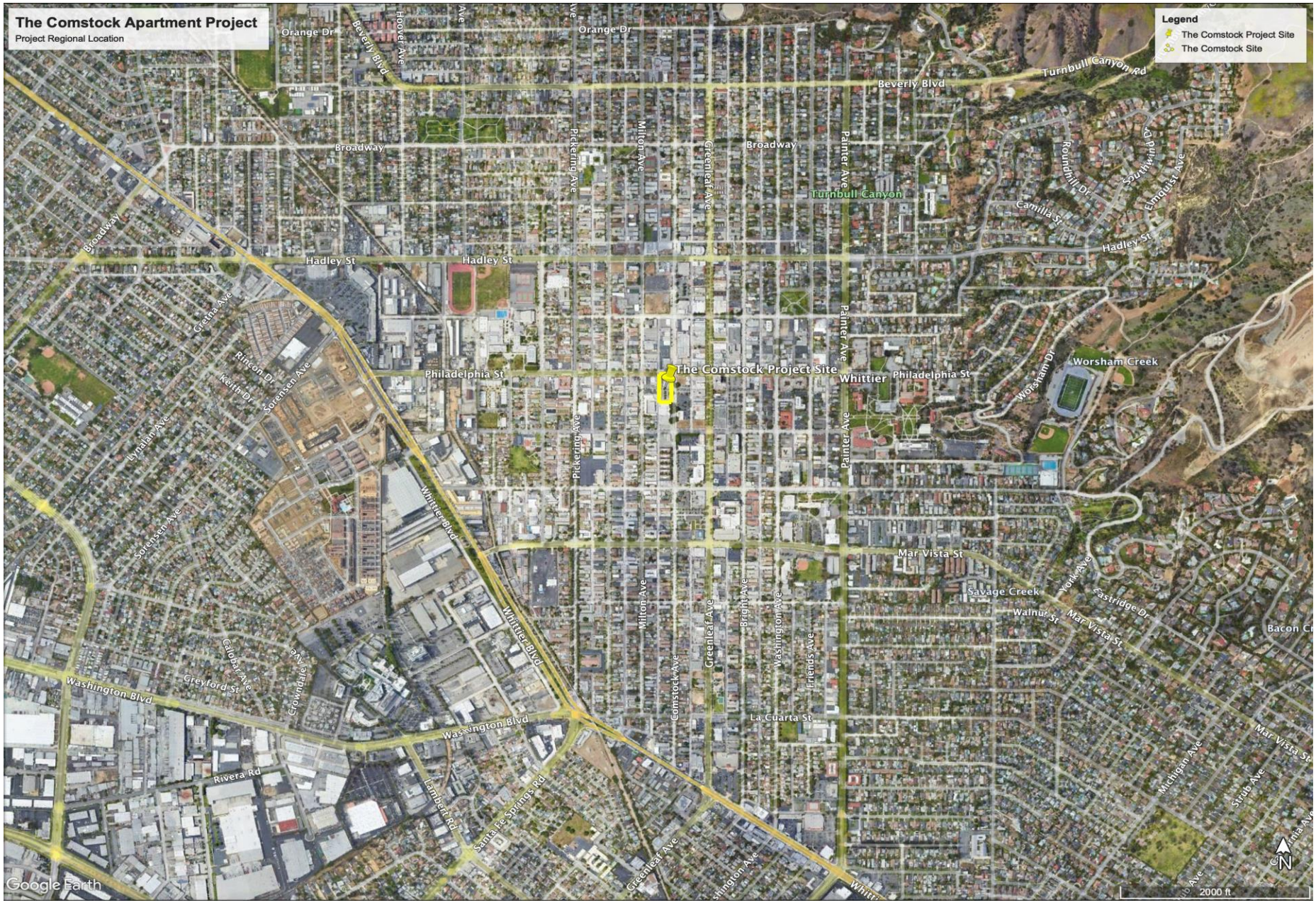

FIGURE 1

Tom Dodson & Associates
Environmental Consultants

Regional Location Map

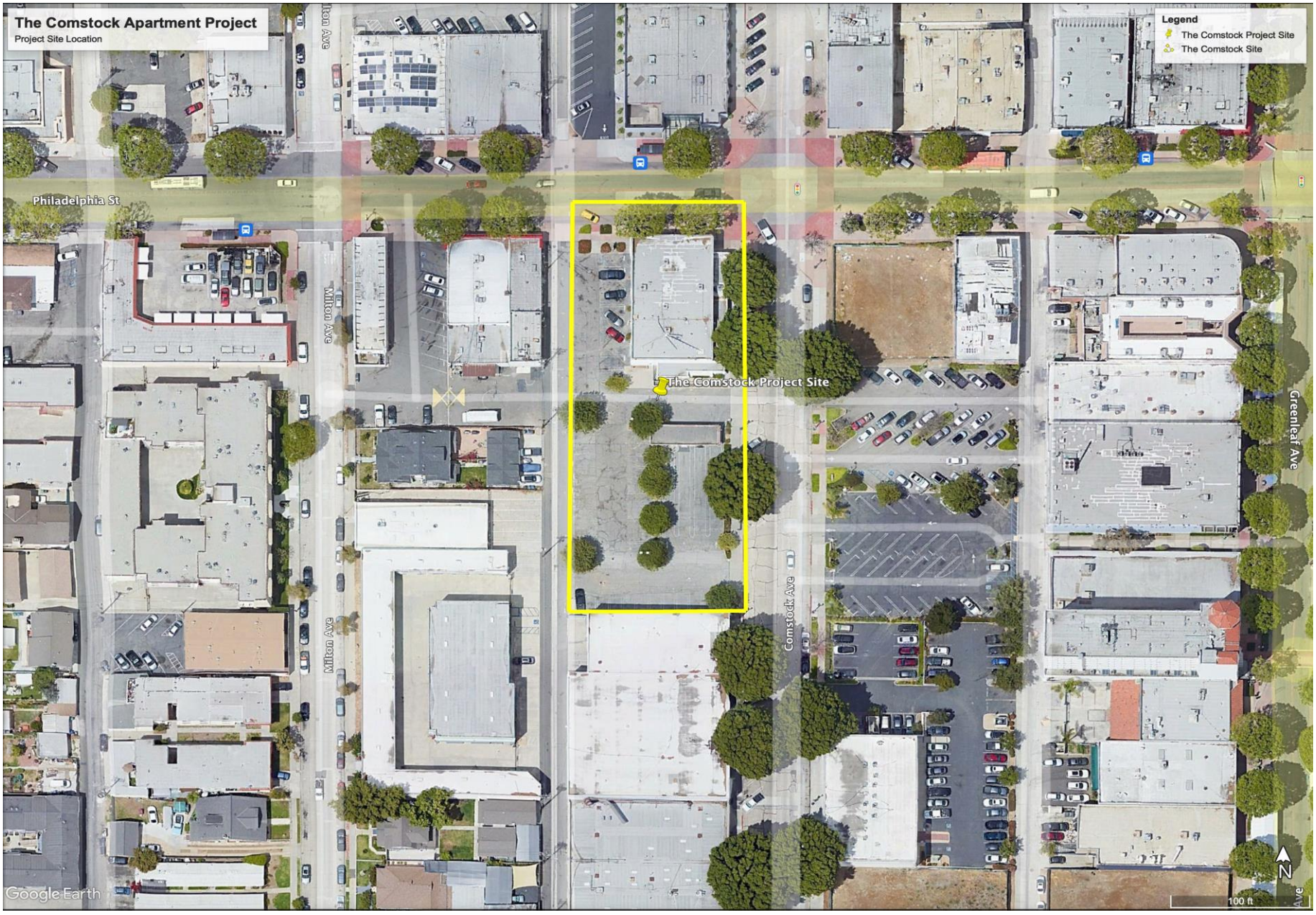

FIGURE 2

Tom Dodson & Associates
Environmental Consultants

Site Location Map

THE COMSTOCK

ENTITLEMENT SUBMITTAL
WHITTIER, CA
August 6, 2021

SHEET INDEX

Sheet Number	Sheet Title
G1.0	COVER SHEET
G1.1	EXISTING SITE CONDITIONS
A1.0	PROJECT INFORMATION
A1.1	SITE PLAN
A1.2	FIRE ACCESS PLAN
A2.0	BUILDING PLANS
A2.1	BUILDING PLANS
A3.0	BUILDING SECTIONS
A4.0	PERSPECTIVES
A4.1	PERSPECTIVES
A5.0	CONCEPTUAL ELEVATIONS
A5.1	CONCEPTUAL ELEVATIONS
A6.0	MATERIAL BOARD
A7.0	UNIT PLANS
A7.1	UNIT PLANS
LANDSCAPE	
L.1	COMPOSITE LANDSCAPE PLAN
L.2	GROUND LEVEL LANDSCAPE PLAN
L.3	LEVEL 3 AMENITY DECK
L.4	LEVEL 4 AMENITY DECK
L.5	PLANT LEGEND, NOTES, SITE LIGHTING
CIVIL	
C.1	PRELIMINARY DEMOLISHING PLAN
C.2	PRELIMINARY GRADING PLAN
C.3	PRELIMINARY WATER AND SEWER PLAN

VICINITY MAP

REVISION LOG

NO.	DESCRIPTION	Date
1	ORIGINAL	X.X.17
2		
2		
3		
4		
5		

Project Team

APPLICANT / OWNER
MW Investment Group, LLC
27702 Crown Valley Parkway, STE D-4-197
Ladera Ranch, Ca 92694
626.710.6377
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matt@walbern.com

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714.639.9860
Contact: Michael Heinrich
Michaelh@aoarchitects.com

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CIVIL ENGINGEERS
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Irvine, CA 92614
949.756.6440
Contact: James Kawamura
jkawamura@khrdesign.com

G1.0

THE COMSTOCK — WHITTIER, CA — 08/06/21 — JOB NO.: 2021-121

MJW Investments, LLC
S27702 Crown Valley Parkway, Suite D-4-197
(626) 710-6377

AO ARCHITECTS
144 NORTH ORANGE ST., ORANGE, CA 92866
(714) 639-9860

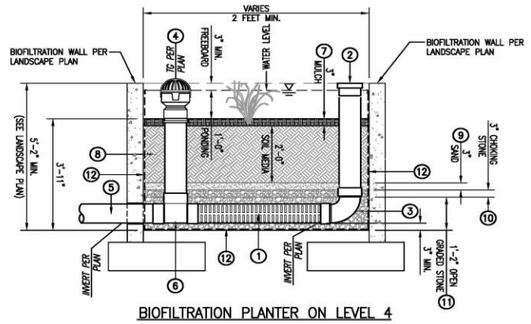
Architecture. Design. Relationships.

Friday, August 06, 2021 9:08:12 AM
R:\2021\2021-121 MW PHILADELPHIA & COMSTOCK WHITTIER\03 DESIGN\SCHEMA\AUTOCAD\21-121_D_G1.0 COVER SHEET.DWG

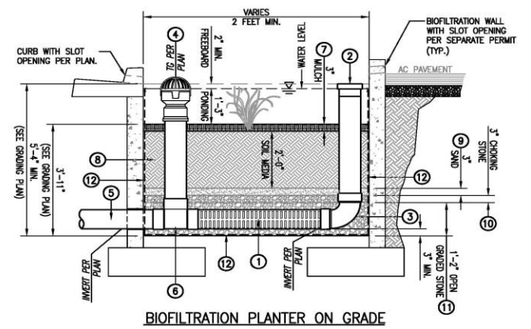
FIGURE 3

Tom Dodson & Associates
Environmental Consultants

Rendering of the Building Proposed to be Constructed at the Site



BIOFILTRATION PLANTER ON LEVEL 4



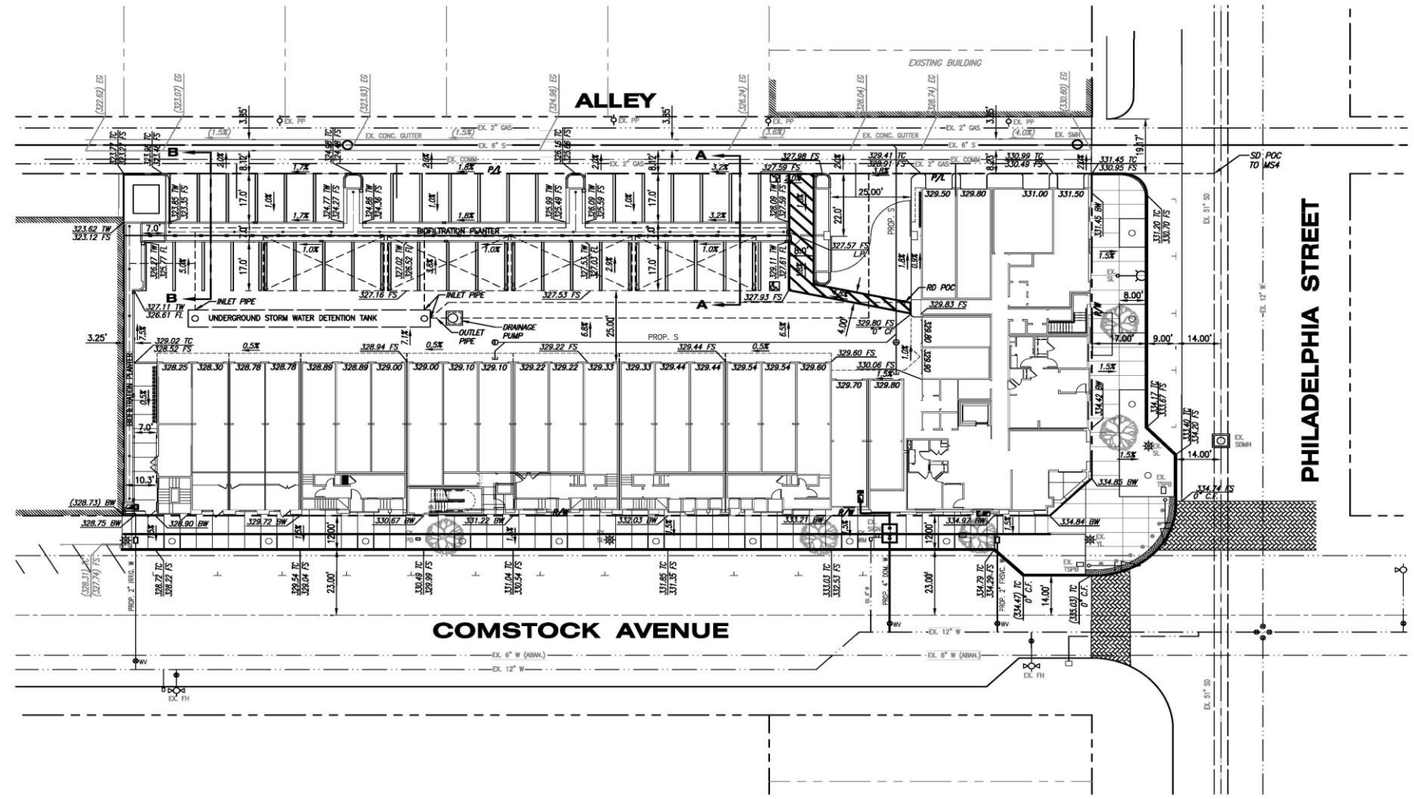
BIOFILTRATION PLANTER ON GRADE

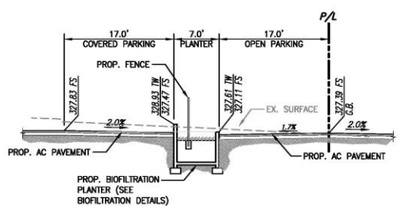
BIOFILTRATION BASIN LEGEND:

1. 8" DIA. SLOTTED SCH. 80 PVC PIPE (PER ASTM D3034) WRAPPED IN MIRAFI 140N FABRIC "SOCK", PROVIDE CLEANOUT AT ALL TERMINIST ENDS. PIPE IS TO BE LAID FLAT ATOP 3-INCHES OF OPEN GRADED GRAVEL.
2. 8" DIA. SCH. 40 PVC CLEANOUT TO 16" ABOVE FINISH GRADE. PROVIDE SEALED CAP.
3. 8" x 90° SCH. 80 PVC BEND.
4. 8" DIA. NYLOPLAST INLET ADAPTOR WITH 8" DIA. NYLOPLAST DUCTILE IRON DOME GRATE, W/ 8" DIA. PVC SCH. 80 PIPE RISER.
5. OUTLET PIPE PER STORM DRAIN PLANS.
6. 8" x 8" x 8" SCH. 80 PVC TEE.
7. MULCH LAYER PER LANDSCAPE ARCHITECT'S PLANS.
8. SOIL MEDIA PLANTING AREA SHOULD CONSIST OF 60%-80% FINE SAND AND 20%-30% COMPOST TO ACHIEVE A MIN. INFILTRATION RATE OF 5-INCHES PER HOUR. PLANTER PER LANDSCAPE ARCHITECT'S PLANS.
9. CLEAN & WASHED SAND BEDDING PER ASTM 33
10. CLEAN & WASHED NO. 8 CHOKING STONE
11. CLEAN & WASHED NO. 57 OPEN GRADED STONE
12. NONWOVEN "MIRAFI S1200" GEOTEXTILE FABRIC OVER 40-MIL GEOSYNTHETIC NON-PERMEABLE MEMBRANE. EXTEND FABRIC & MEMBRANE UP PLANTER WALLS AND SECURE TO WALL WITH TERMINATION BAR.

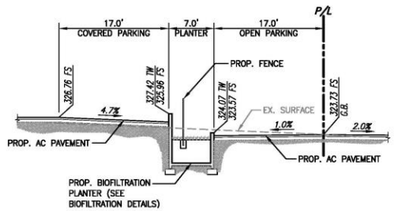
BIOFILTRATION PLANTER DETAILS

SCALE: NONE





SECTION A-A



SECTION B-B

EARTHWORK QUANTITY ESTIMATE

CUT	689 CY
FILL	1,219 CY
TOTAL IMPORT	530 CY

0 10 20 40 60

SCALE: 1"=20' DATE: 6/22/22

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Civil Engineer

PREPARED BY:
KIMLEY-HORN ASSOCIATES
CONSULTING ENGINEERS/SURVEYORS/PLANNERS
17590 Von Karman Avenue - Suite 200, Irvine, California 92614
(949) 756-0440 Fax (949) 756-0444

UNDER THE SUPERVISION OF: JAMES H. KAWAKAMI, R.C.E. 30560

REGISTERED PROFESSIONAL ENGINEER JAMES H. KAWAKAMI No. 30560 Expires: 6/30/24 CIVIL STATE OF CALIFORNIA

Client

MW INVESTMENT GROUP, LLC

27702 CROWN VALLEY PARKWAY, SUITE D-3-197
LADERA RANCH, CA 92694

THE COMSTOCK

WHITTHIER, CA

PRELIMINARY GRADING PLAN

C-2

Project Number: 2021-121
Plan Check Number:

C:\Users\120\AO Associates Dropbox\AO Shared\MW Investment\MW-Comstock-Whittier\120\Preliminary\MWP-SIP C-2 GRADing Jun 22, 2022 - 10:37pm

FIGURE 4

Tom Dodson & Associates
Environmental Consultants

Preliminary Grading Plan

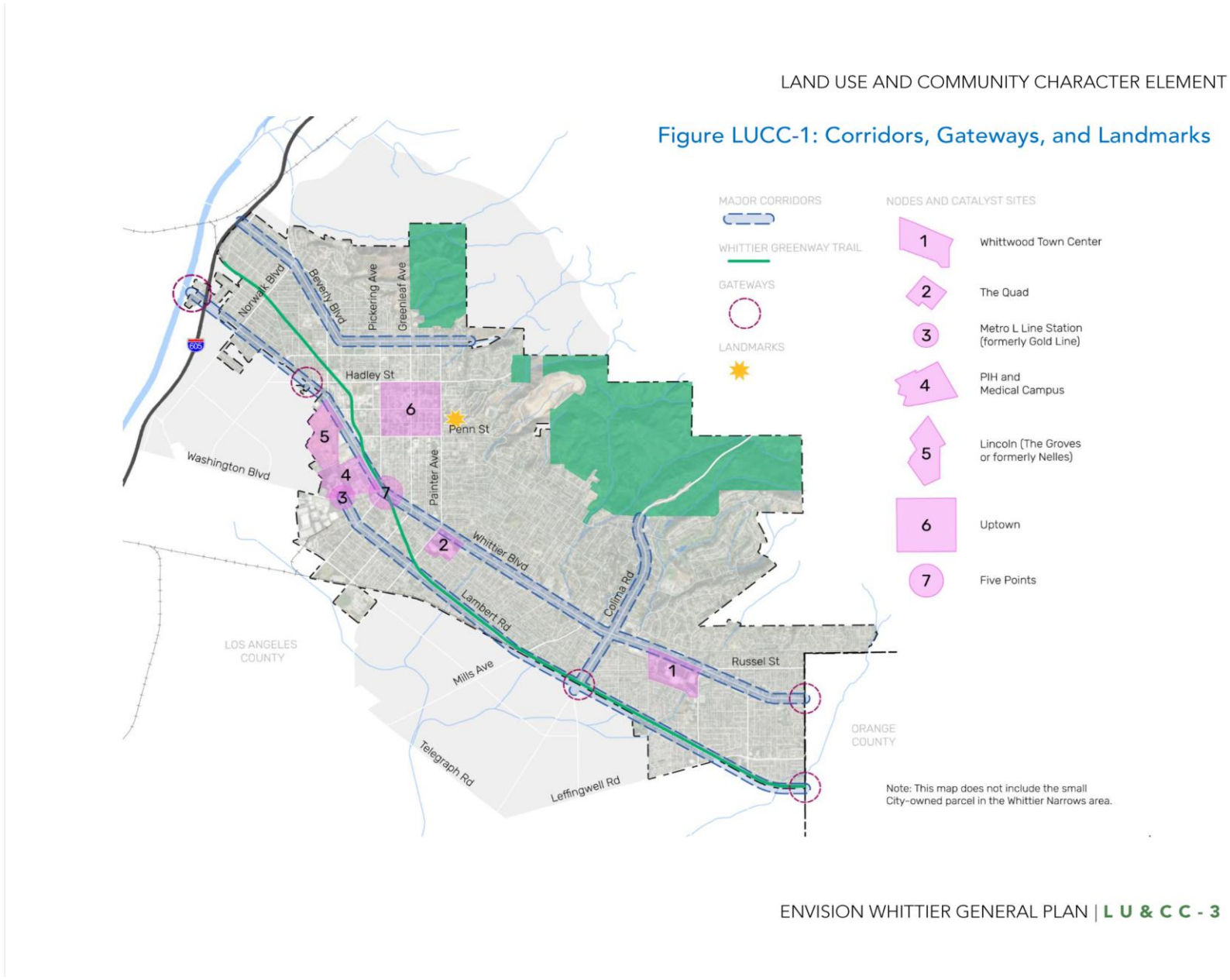

FIGURE I-1

Tom Dodson & Associates
Environmental Consultants

Corridors, Gateways and Landmarks

SOURCE: Air Quality Impact Analysis prepared by Urban Crossroads dated December 22, 2021

FIGURE III-1

Tom Dodson & Associates
Environmental Consultants

Receptors in the Project Study Area

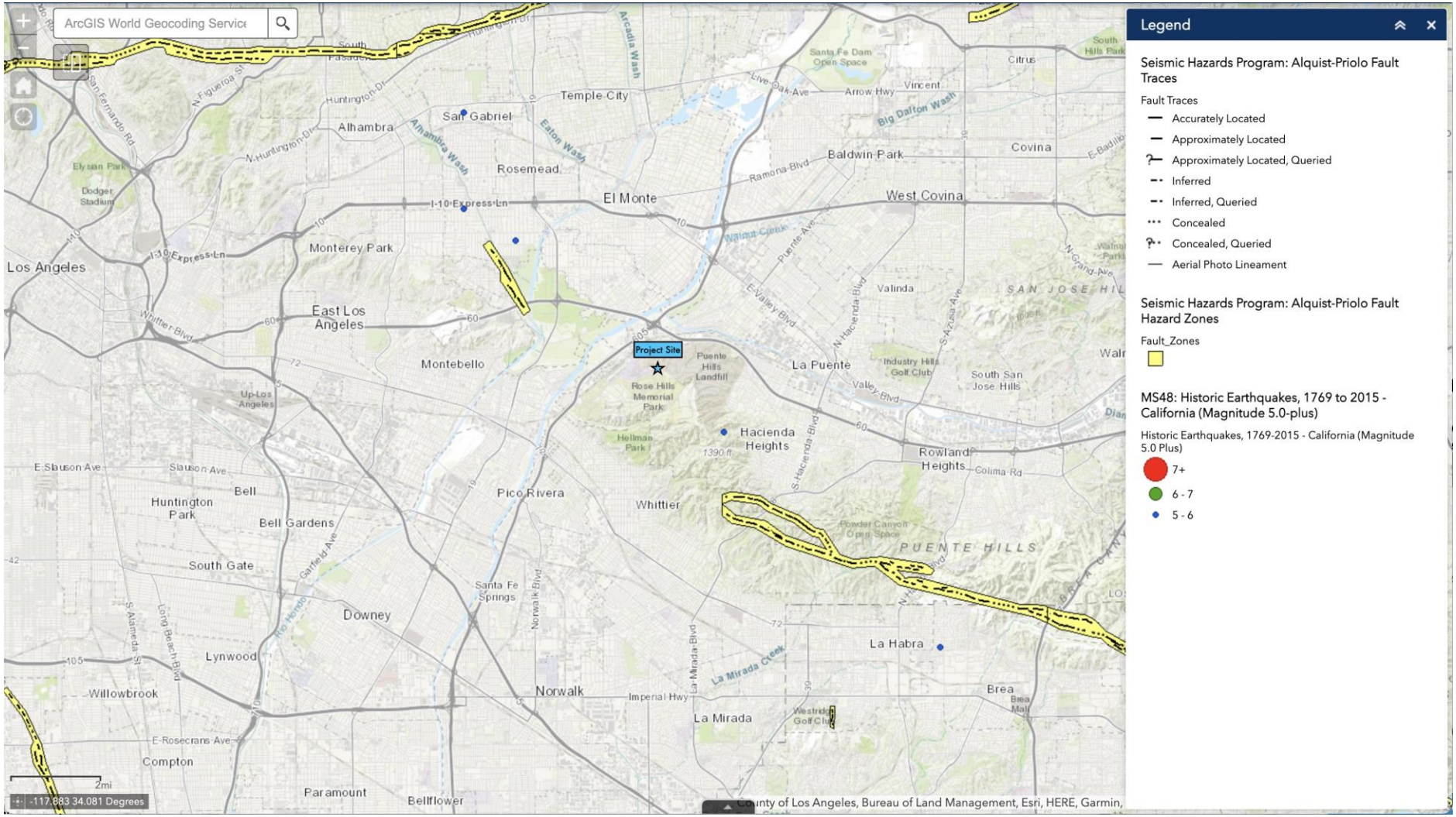

FIGURE VII-1

Tom Dodson & Associates
Environmental Consultants

Alquist-Priolo Fault Traces and Hazard Zones

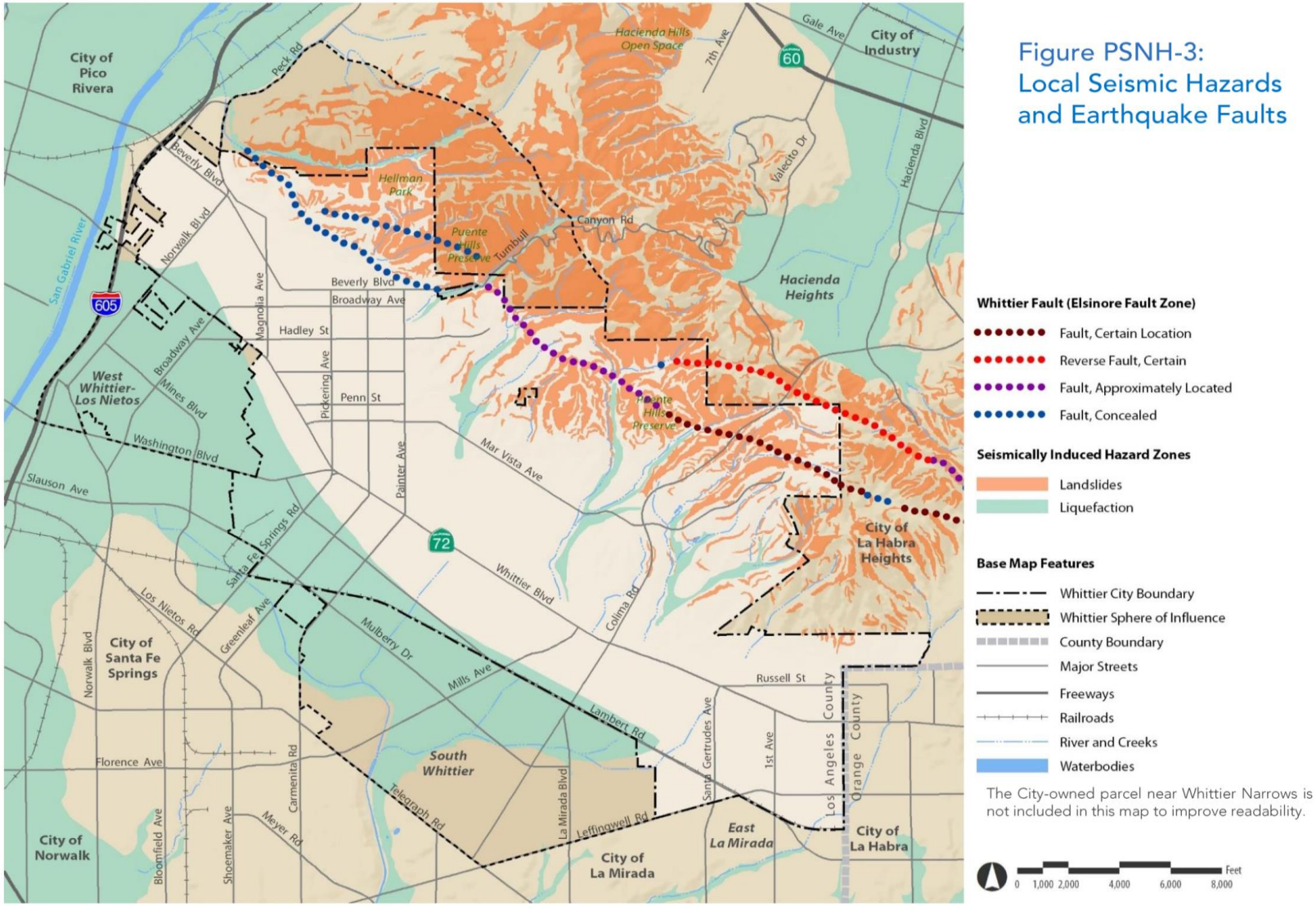

FIGURE VII-2

Tom Dodson & Associates
Environmental Consultants

Local Seismic Hazards and Earthquake Faults

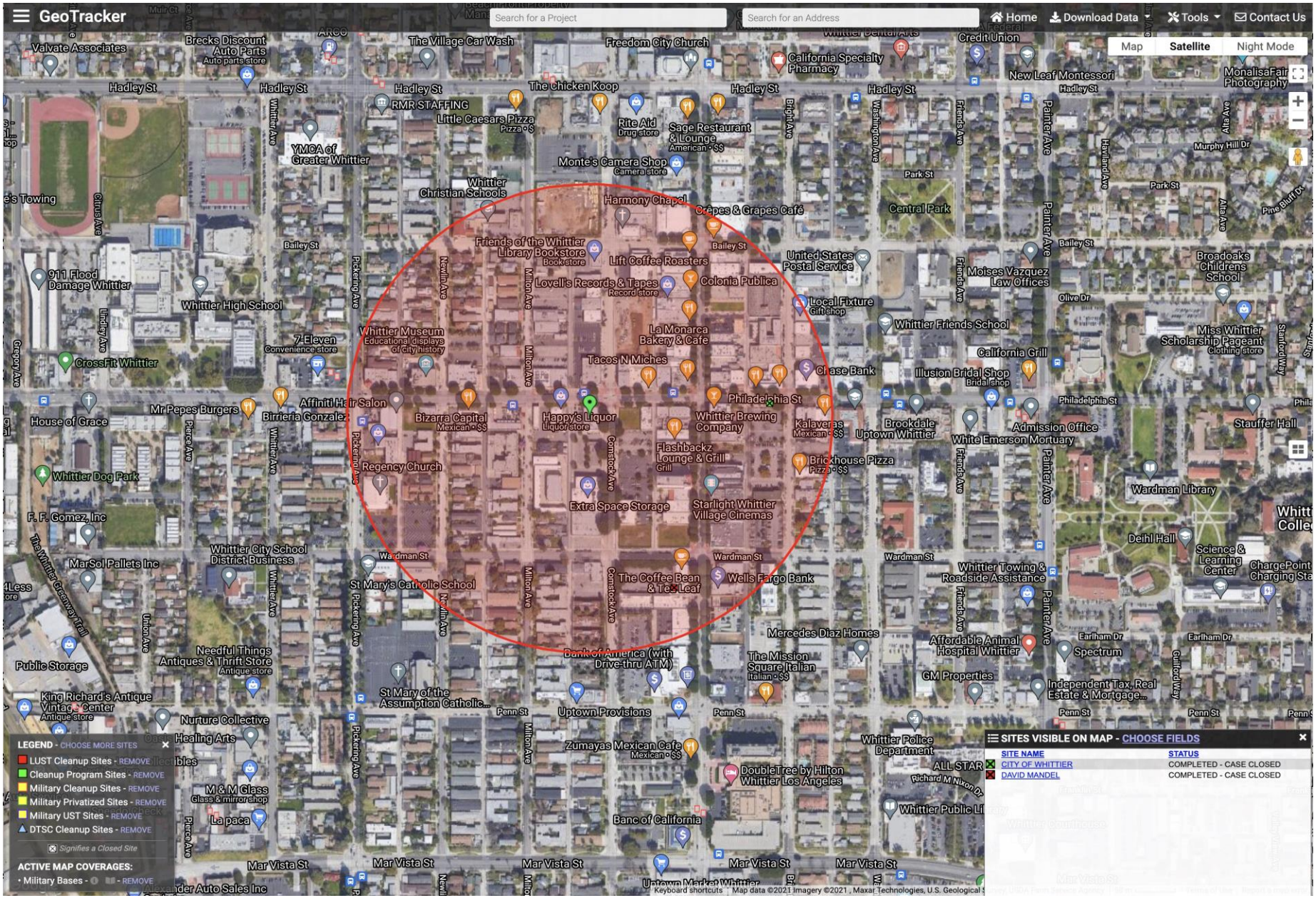

FIGURE IX-1

Tom Dodson & Associates
Environmental Consultants

GeoTracker

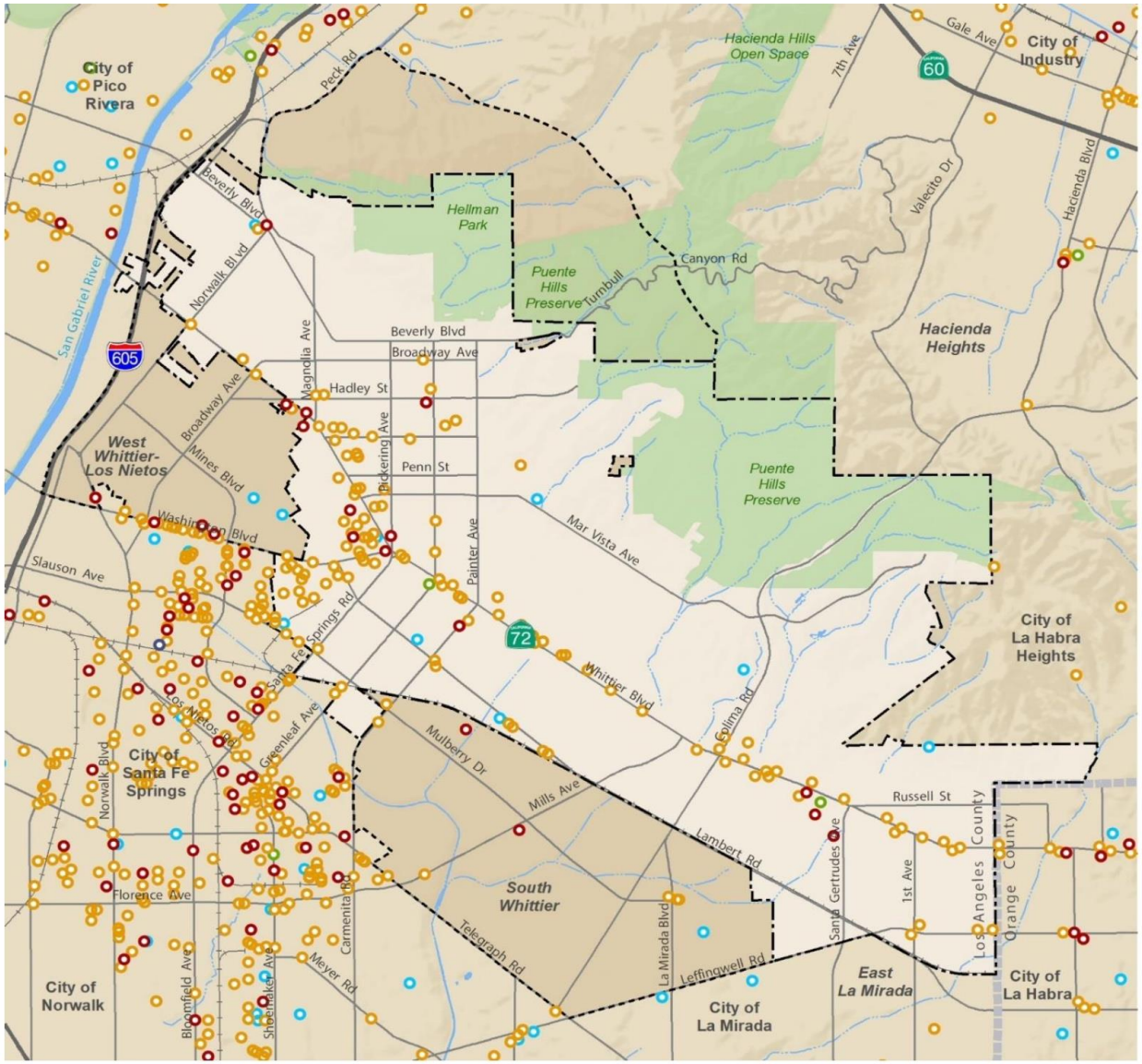

Figure PSNH-7: Hazardous Waste Generators

Hazardous Waste

- Large Quantity Generator (LQG)
- Small Quantity Generator (SQG)
- Conditionally Exempt SQG (CESQG)
- Hazardous Waste Transporter
- Transfer Facility

LQG: A business that generates more than 2,200 lbs per month of hazardous waste

SGQ: A business that generates more than 220 lbs but less than 2,200 lbs of hazardous waste per month

CESGQ: A business that generates less than 220 lbs of hazardous waste per month

Base Map Features

- Whittier City Boundary
- Whittier Sphere of Influence
- County Boundary
- Major Streets
- Freeways
- Railroads
- River and Creeks
- Waterbodies
- Open Space/Natural Areas

The City-owned parcel near Whittier Narrows is not included in this map to improve readability.

0 1,000 2,000 4,000 6,000 8,000 Feet

FIGURE IX-2

Tom Dodson & Associates
Environmental Consultants

Hazardous Waste Generators

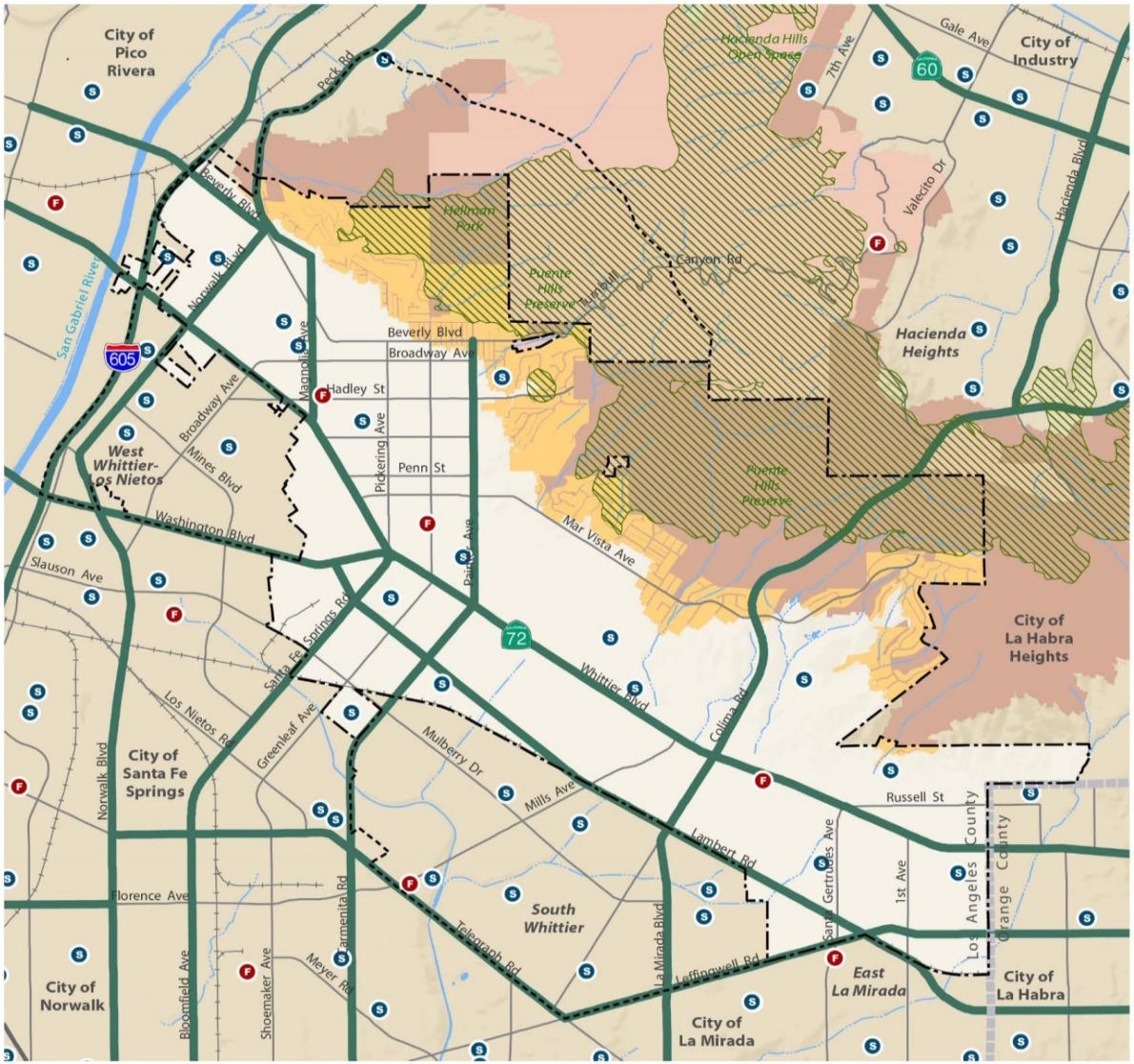

Figure PSNH-4: Wildfire Hazards

Fire Hazards
- Very High Fire Hazard Severity Zone (SRA)
- Very High Fire Hazard Severity Zone (LRA)
- Residential GP Designations in VHFHSZ
- Historic Fire Perimeters

Emergency Routes
- Evacuation Routes

Public Facilities
- Fire Stations
- Schools

Base Map Features
- Whittier City Boundary
- Whittier Sphere of Influence
- County Boundary
- Major Streets
- Freeways
- Railroads
- River and Creeks
- Waterbodies

The City-owned parcel near Whittier Narrows is not included in this map to improve readability.

0 1,000 2,000 4,000 6,000 8,000 Feet

FIGURE IX-3

Tom Dodson & Associates
Environmental Consultants

Wildfire Hazards

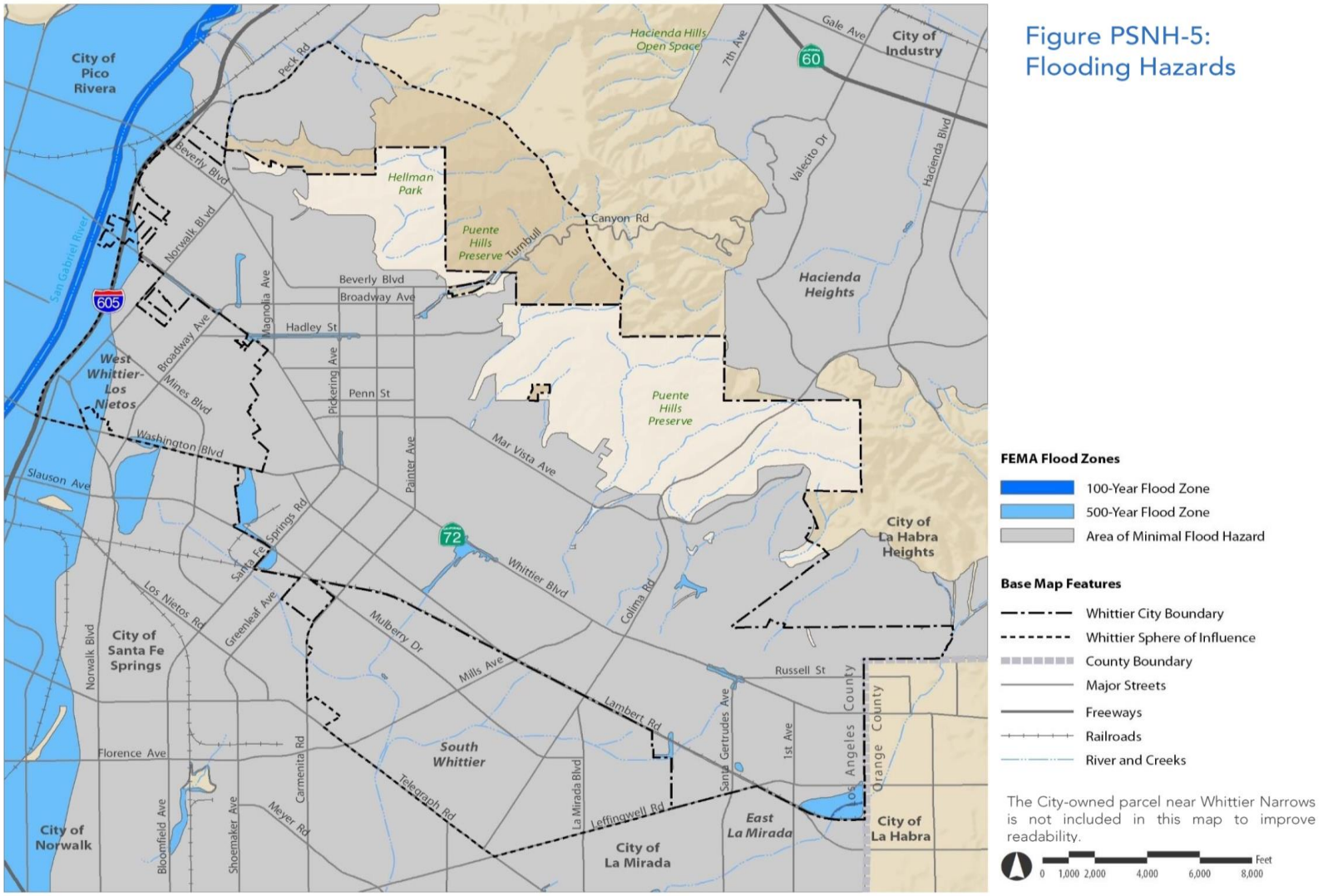

Figure PSNH-5: Flooding Hazards

FIGURE X-1

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Environmental Consultants

Flooding Hazards

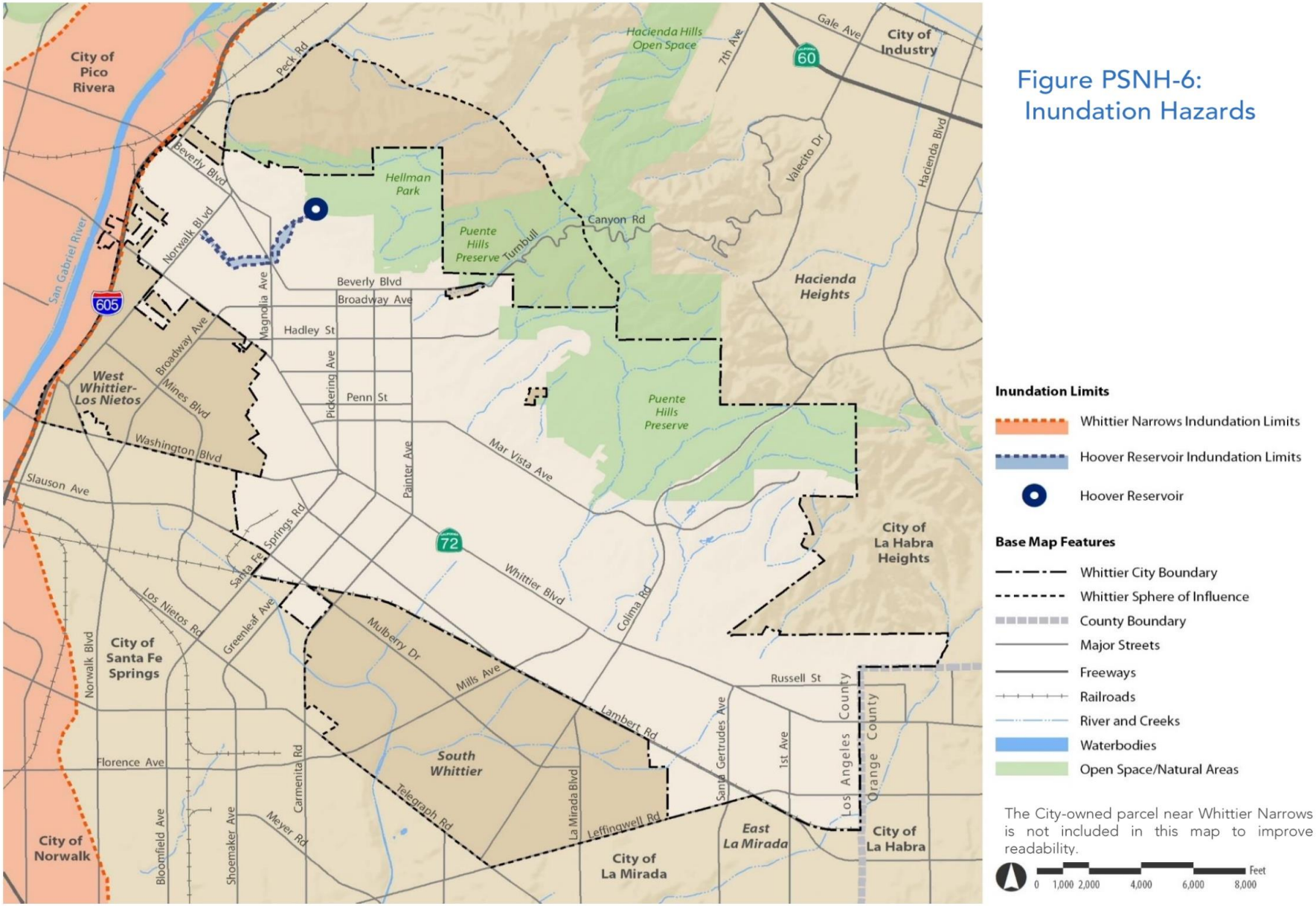

FIGURE X-2

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Environmental Consultants

Inundation Hazards

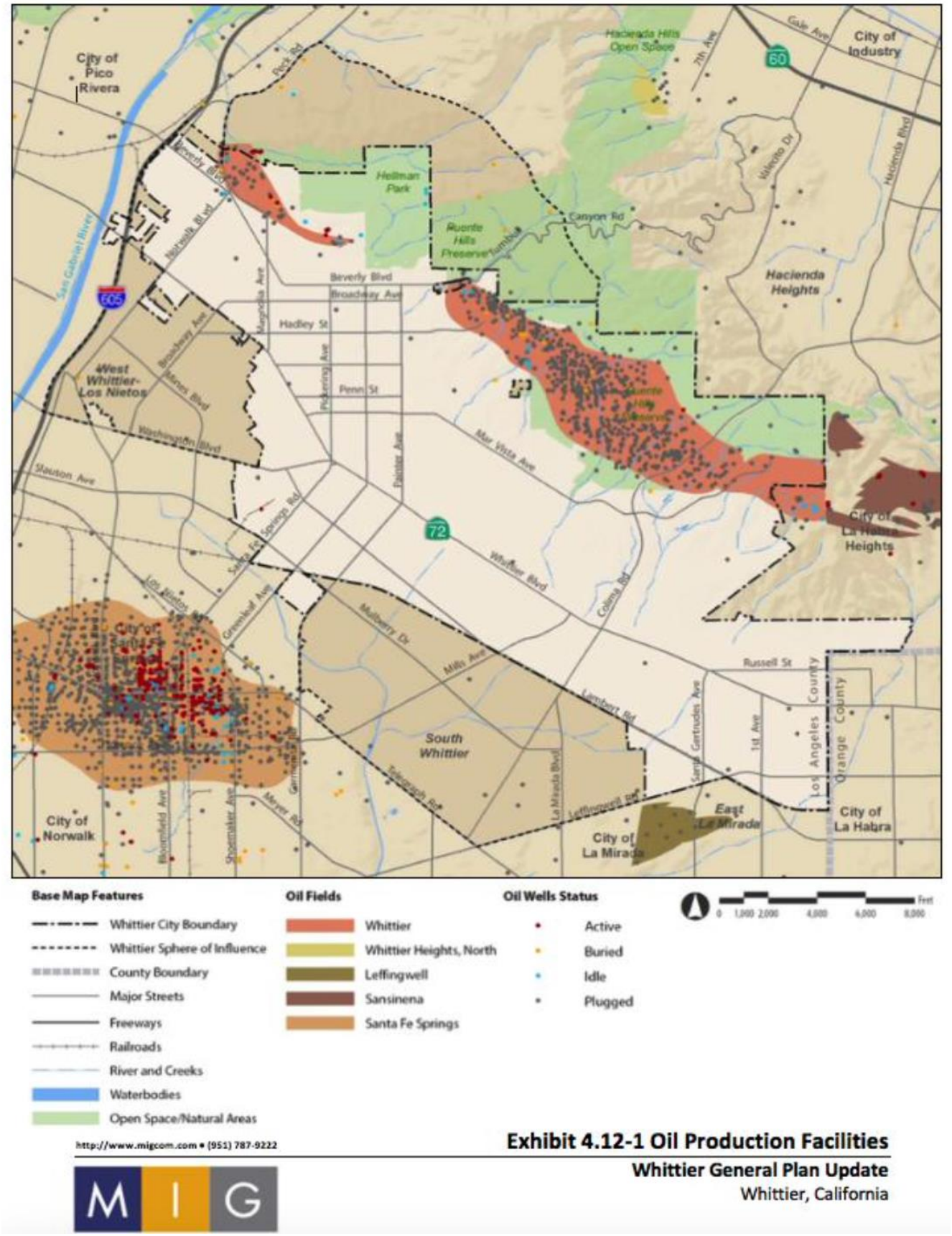


FIGURE XII-1

Tom Dodson & Associates
Environmental Consultants

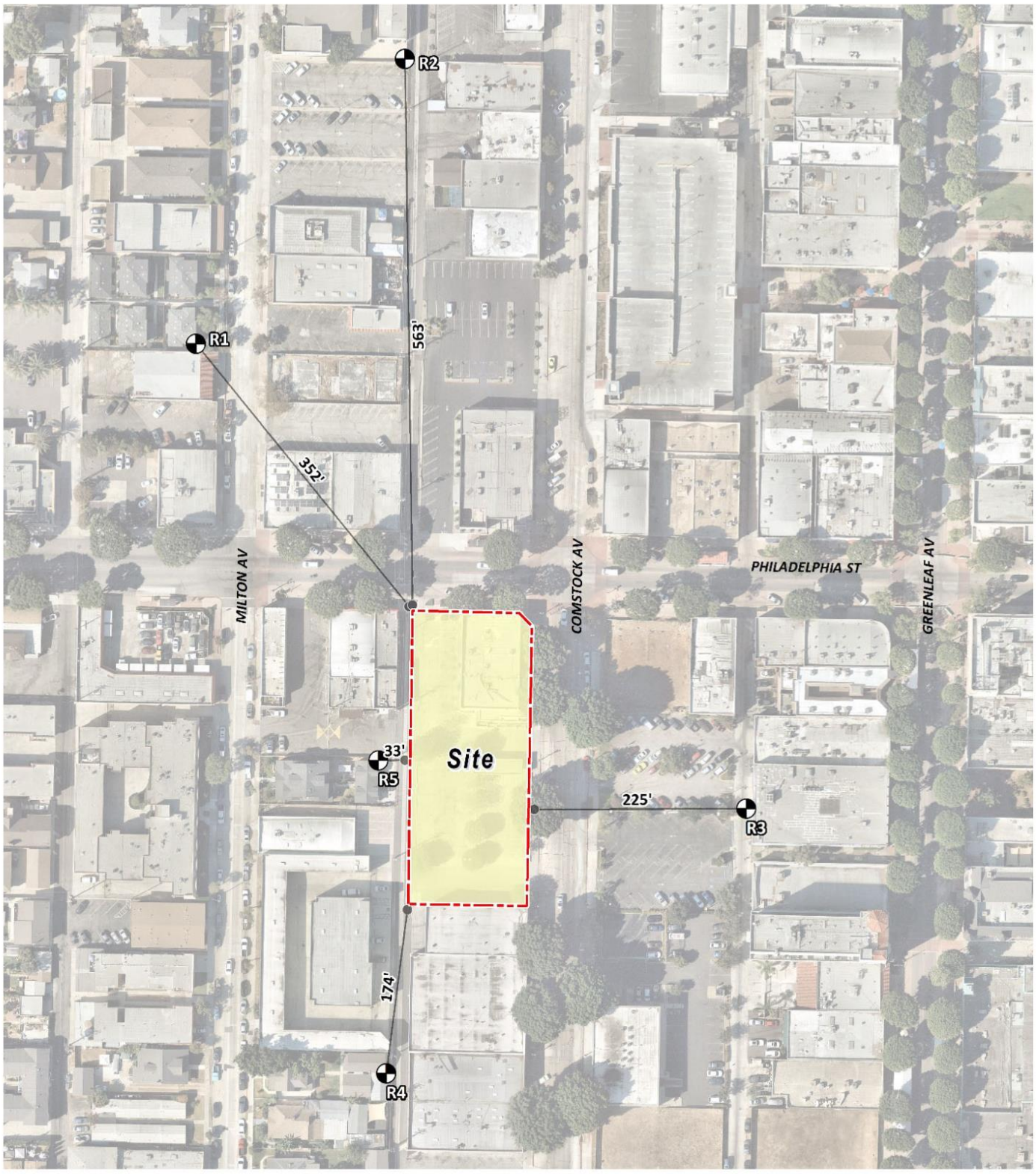
Oil Production Facilities

SOURCE: Noise Impact Analysis prepared by Urban Crossroads dated January 13, 2022

FIGURE XIII-1

Tom Dodson & Associates
Environmental Consultants

Noise Measurement Locations

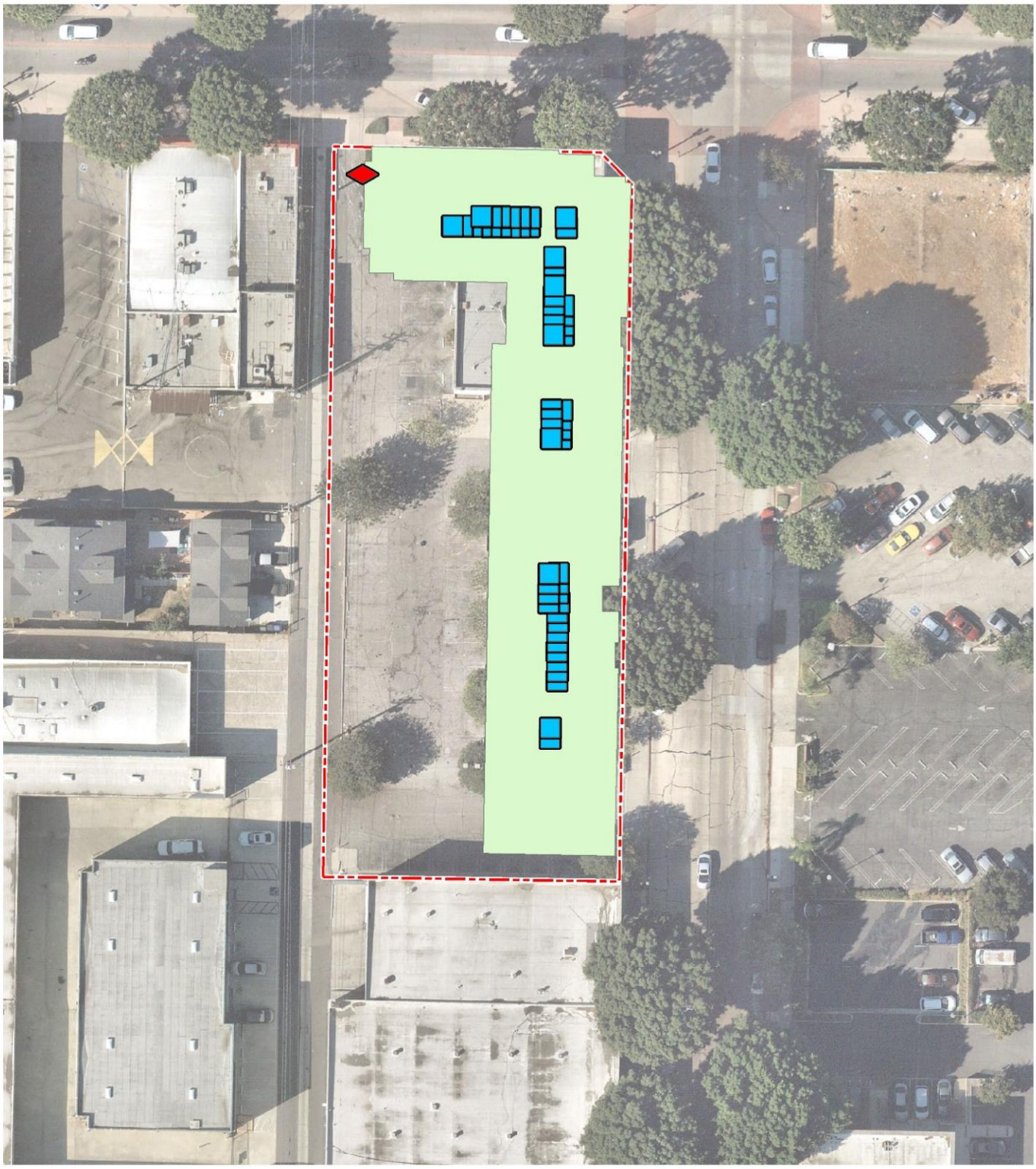


SOURCE: Noise Impact Analysis prepared by Urban Crossroads dated January 13, 2022

FIGURE XIII-2

Tom Dodson & Associates
Environmental Consultants

Sensitive Receiver Locations



SOURCE: Noise Impact Analysis prepared by Urban Crossroads dated January 13, 2022

FIGURE XIII-3

Tom Dodson & Associates
Environmental Consultants

Operational Noise Source Locations

SOURCE: Noise Impact Analysis prepared by Urban Crossroads dated January 13, 2022

FIGURE XIII-4

Tom Dodson & Associates
Environmental Consultants

Typical Construction Noise Source Locations

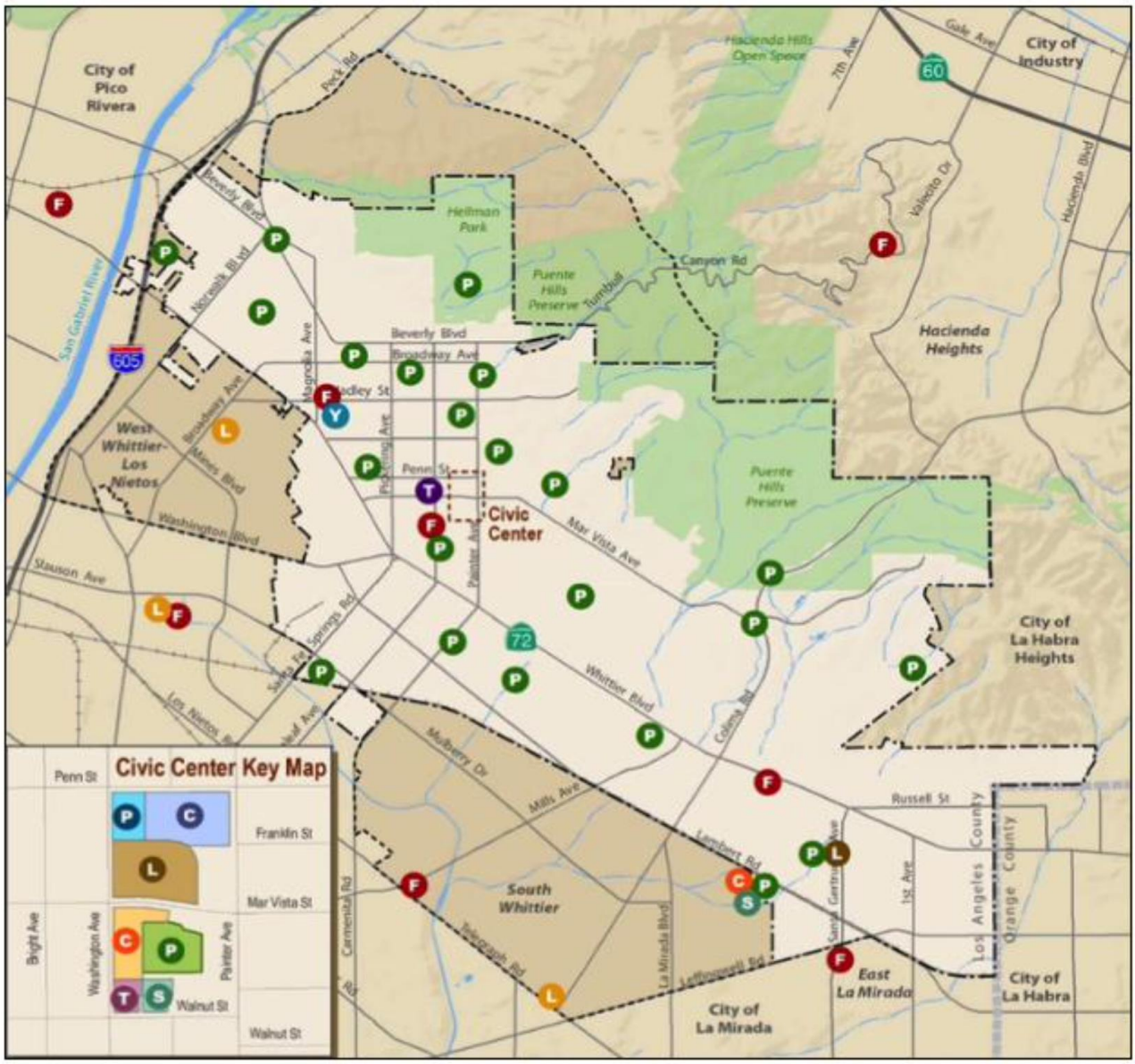


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Exhibit 4.15-1 Community Facilities
Whittier General Plan Update
Whittier, California

FIGURE XV-1

Tom Dodson & Associates
Environmental Consultants

Community Facilities

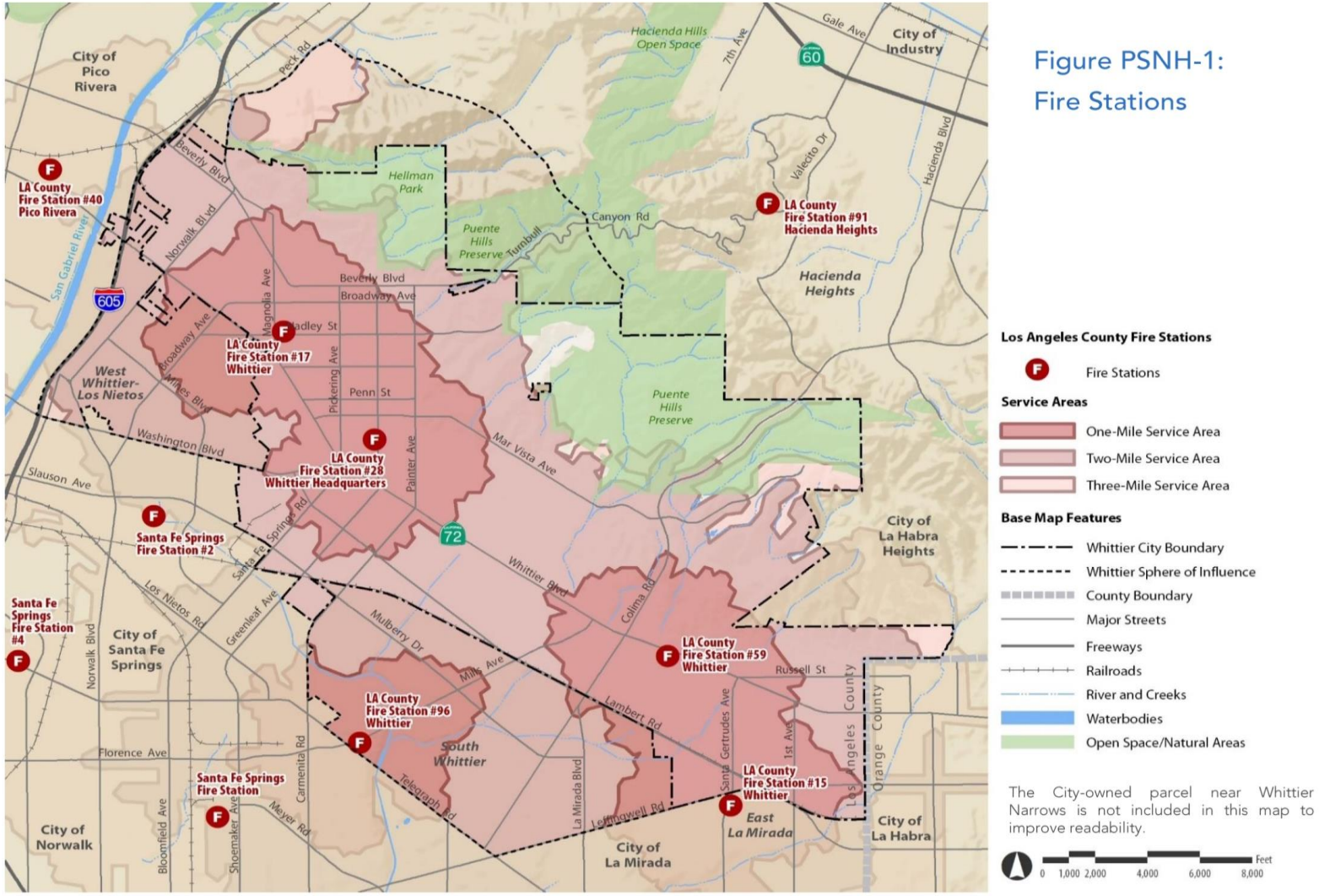

FIGURE XV-2

Tom Dodson & Associates
Environmental Consultants

Fire Stations

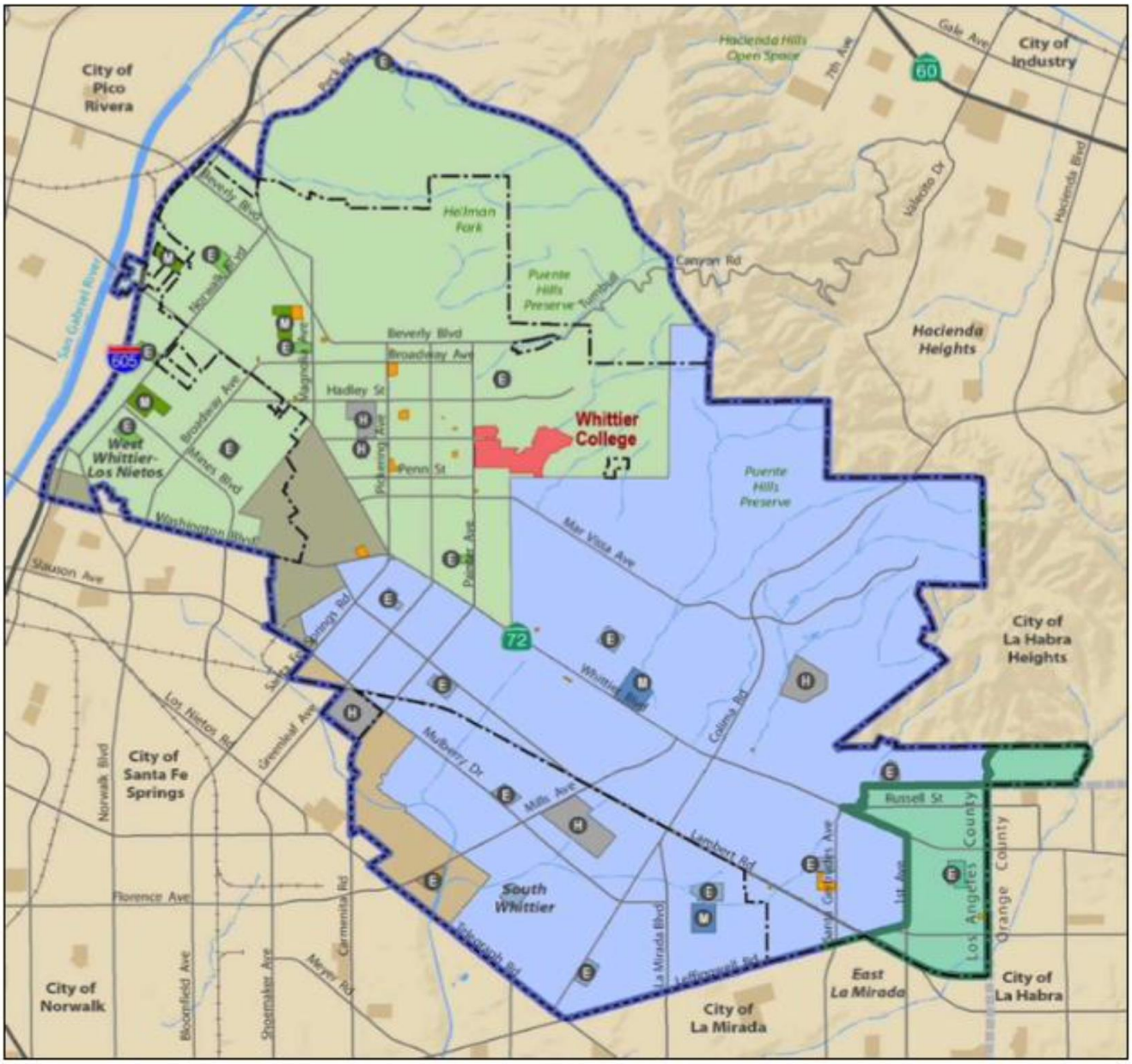

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Exhibit 4.15-3 Districts and Schools

Whittier General Plan Update

Whittier, California

FIGURE XV-3

Tom Dodson & Associates
Environmental Consultants

Districts and Schools

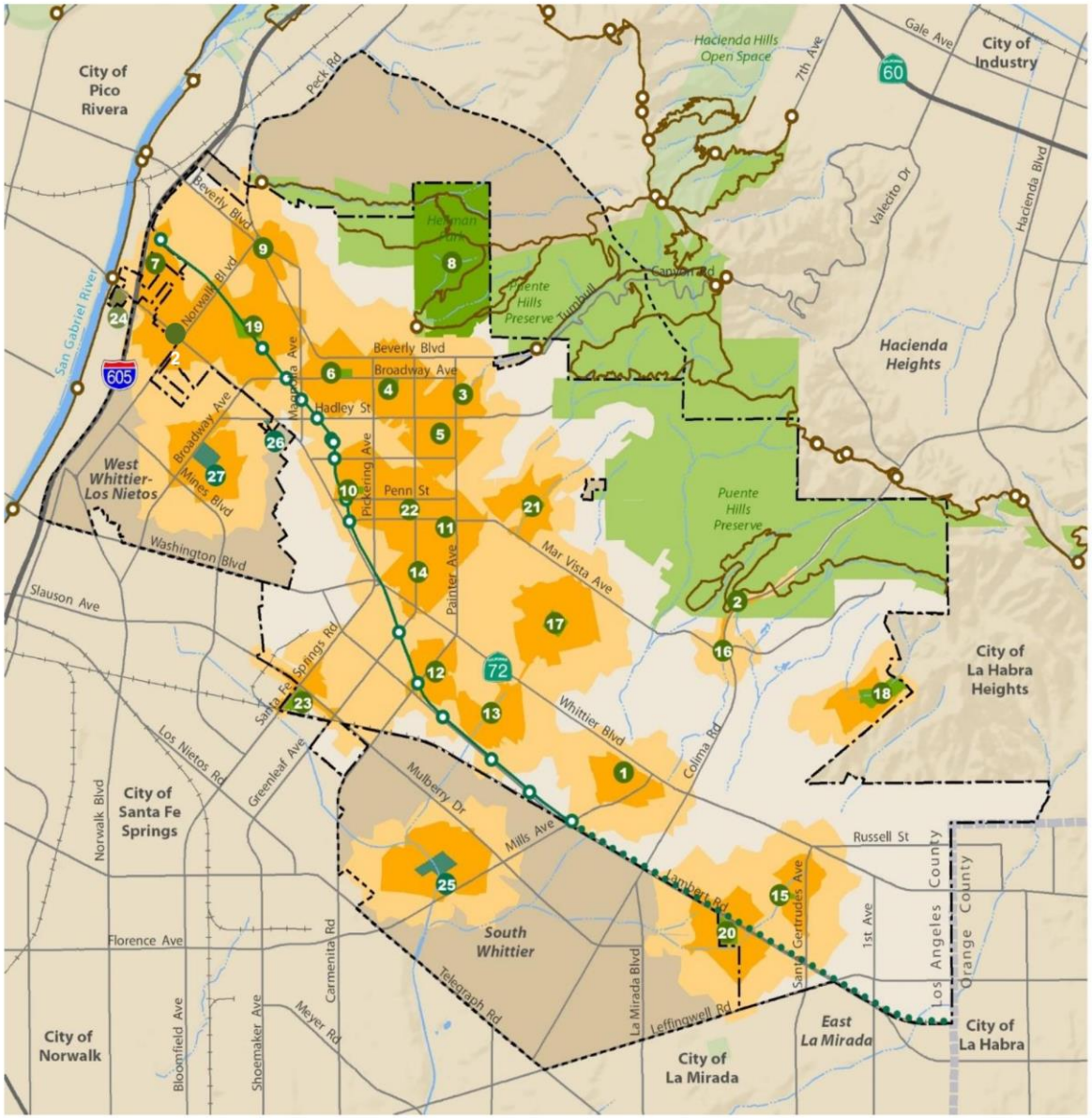


Figure RM-2: Recreation Facilities and Access

Parks and Recreation Facilities
- Whittier Parks
- Los Angeles County Parks
- Pio Pico State Historic Park

Park Service Areas to Neighborhoods
- Within 1/4-Mile Walking Distance
- Within 1/2-Mile Walking Distance

Open Space
- Puente Hills Habitat Authority
- Open Space/Natural Areas

Trails
- Greenway Trail
- Greenway Trail Extension
- Greenway Trail Access Points
- Other Trails
- Other Trail Access Points/Trailheads

Base Map Features
- Whittier City Boundary
- Whittier Sphere of Influence
- County Boundary
- Major Streets
- Freeways
- Railroads
- River and Creeks
- Waterbodies

Source: City of Whittier and Los Angeles County Parks and Recreation Department, 2017.

Prepared by MIG, July 2017.

The City-owned parcel located near Whittier Narrows is excluded from this map to increase the maps readability.

FIGURE XV-4

Tom Dodson & Associates
Environmental Consultants

Recreation Facilities and Access

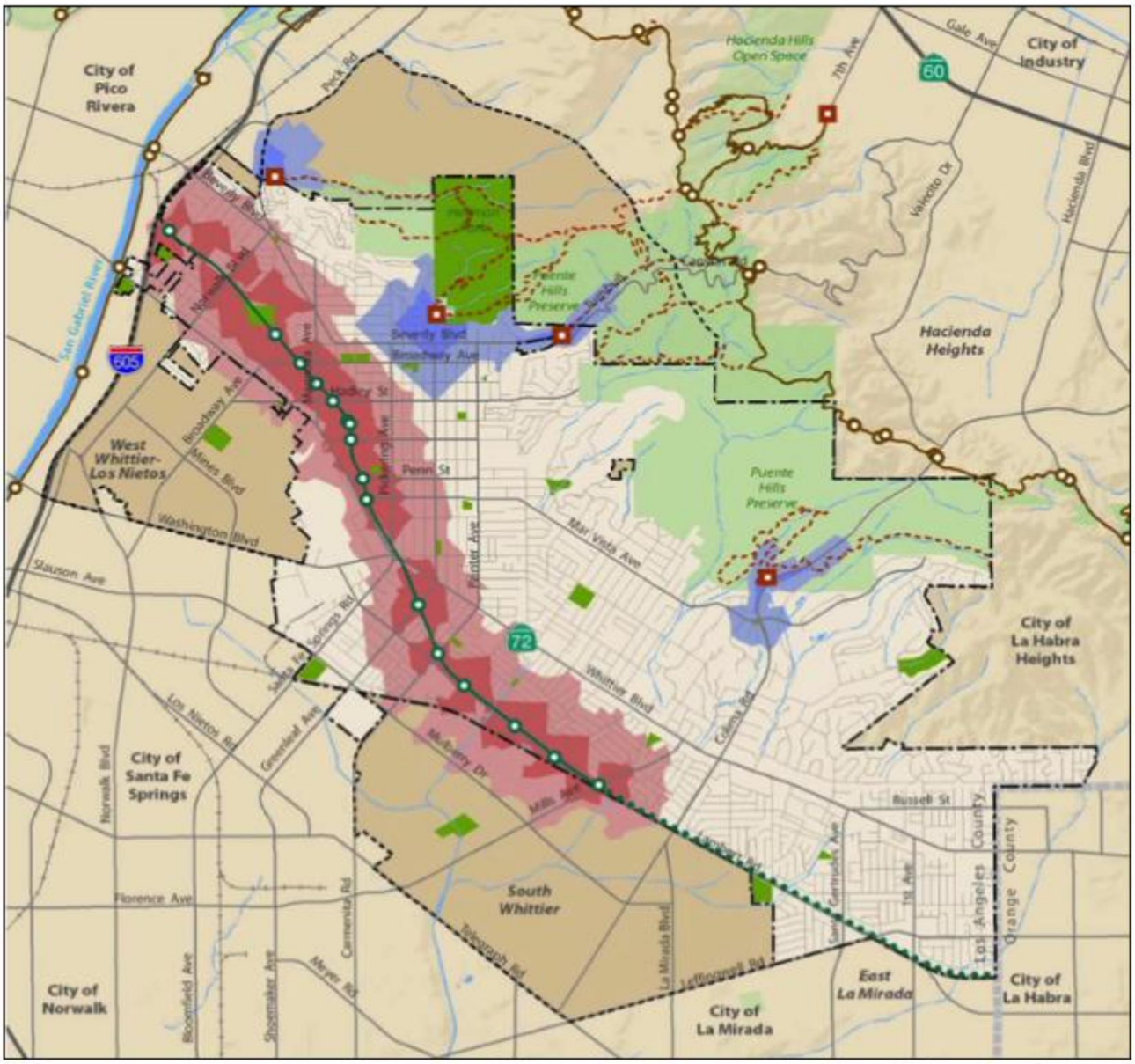
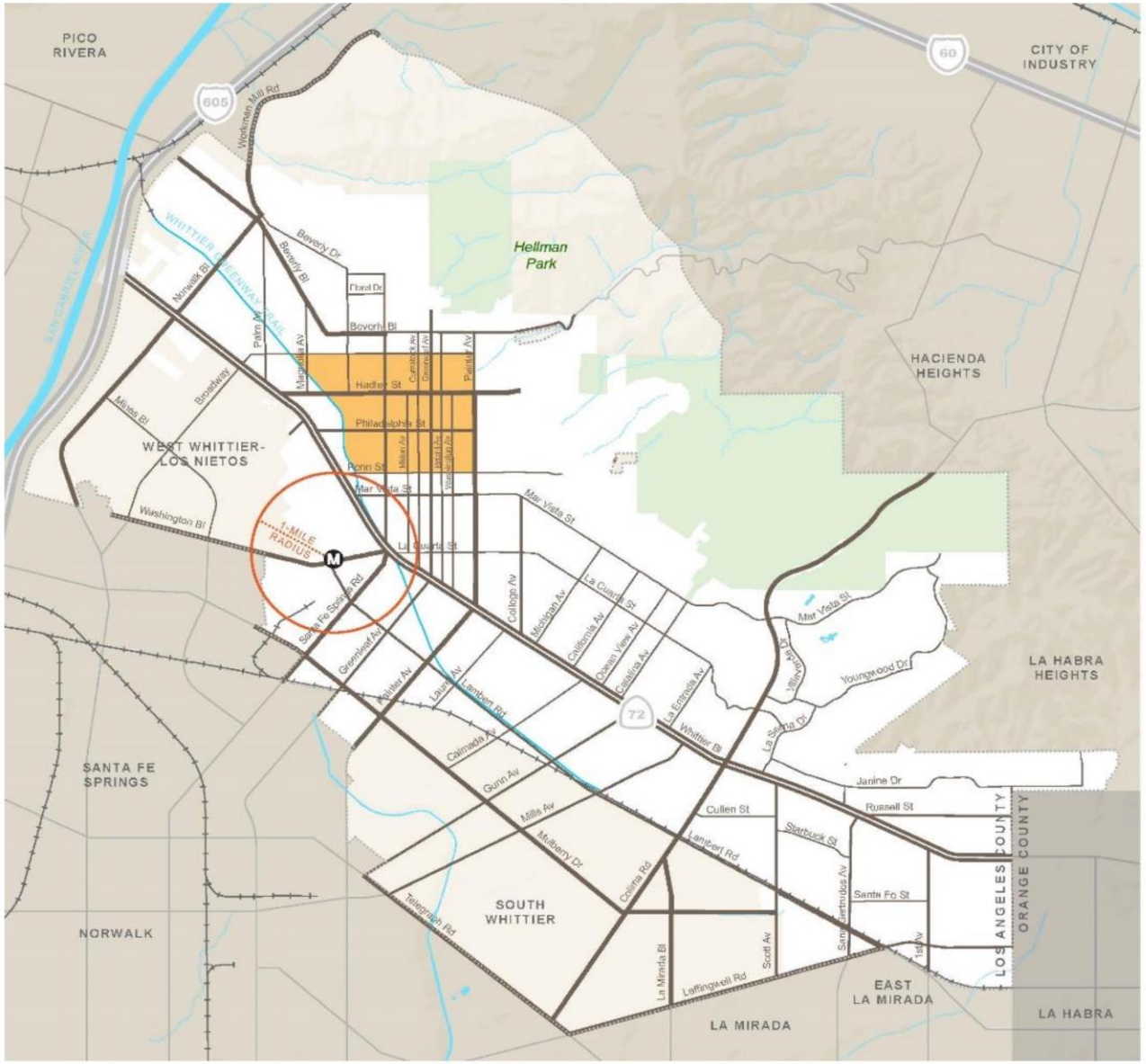


FIGURE XVI-1

Tom Dodson & Associates
Environmental Consultants

Trails, Greenways & Open Space



MOBILITY AND INFRASTRUCTURE ELEMENT

Figure MI-1: Street Classification

Street Classification

- Major Arterial
- Minor Arterial
- Secondary Street
- Collector Street
- Transit Priority Area
- Uptown Whittier
- City Boundary
- Sphere of Influence
- Railroads
- Waterways
- Open Space

Source: Whittier General Plan, 1993
Prepared by: Fehr & Peers, 2021

0 1,000 2,000 4,000 6,000 8,000 Feet

FIGURE XVII-1

Tom Dodson & Associates
Environmental Consultants

Street Classification

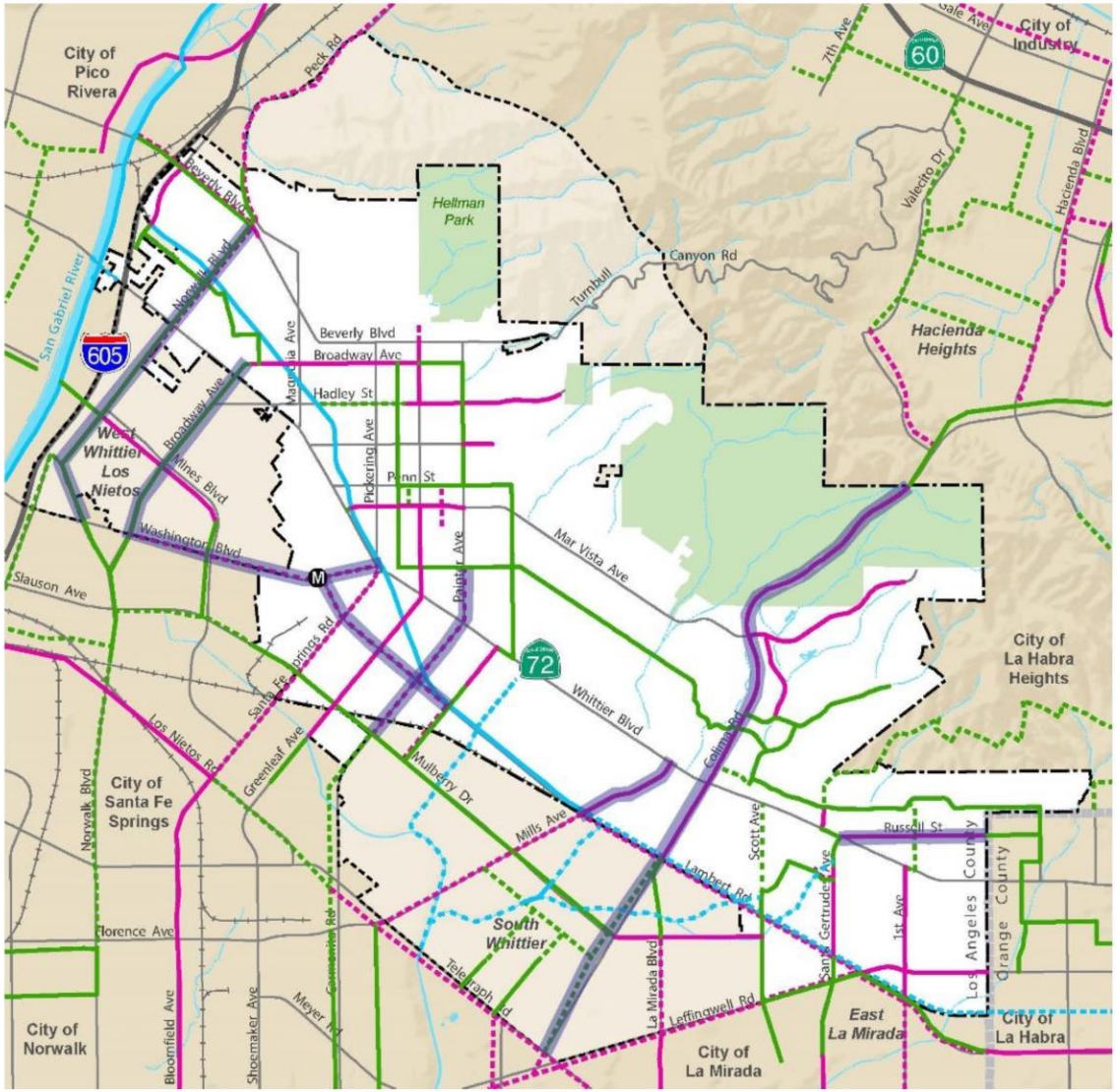


Figure MI-2: Existing and Proposed Bike Facilities

Bike Path Status and Class

- Existing Class I Bike Path
- Existing Class II Bike Path
- Existing Class III Bike Path
- Proposed Class I Bike Path
- Proposed Class II Bike Path
- Proposed Class III Bike Path
- Proposed Facility Enhancement
- Whittier City Boundary
- Whittier Sphere of Influence
- County Boundary
- Major Streets
- Freeways
- Railroads
- River and Creeks
- Open Space
- Waterbodies

Source: City of Whittier, 2017.
Prepared by Fehr & Peers, July 2017.

0 1,000 2,000 4,000 6,000 8,000 Feet

FIGURE XVII-2

Tom Dodson & Associates
Environmental Consultants

Existing and Proposed Bike Facilities

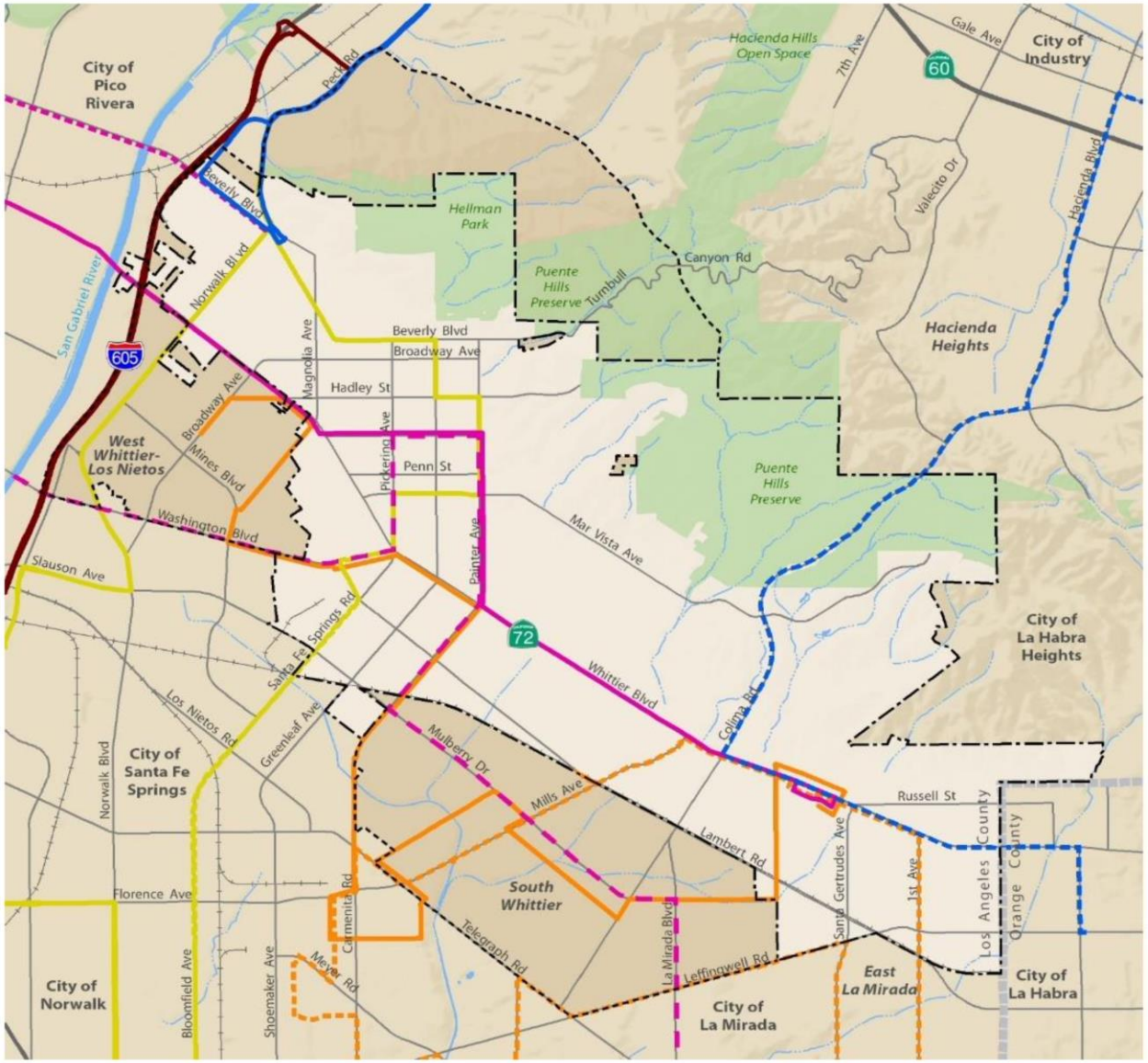


Figure MI-3: Bus Transit Routes

Bus Routes

- Foothill Transit - 274
- Foothill Transit - 285
- LA Metro - 120
- Montebello - 10
- Montebello - 40 and 90
- Montebello - 50
- Norwalk Transit -1
- Norwalk Transit - 7
- Sunshine Shuttle - A
- Sunshine Shuttle - B

Base Map Features

- Whittier City Boundary
- Whittier Sphere of Influence
- County Boundary
- Major Streets
- Freeways
- Railroads
- River and Creeks
- Open Space/Natural Areas

Source: Fehr & Peers; 2017 and City of Whittier, 2017.
Prepared by Fehr & Peers, September 2017.

0 1,000 2,000 4,000 6,000 8,000 Feet

FIGURE XVII-3

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Bus Transit Routes

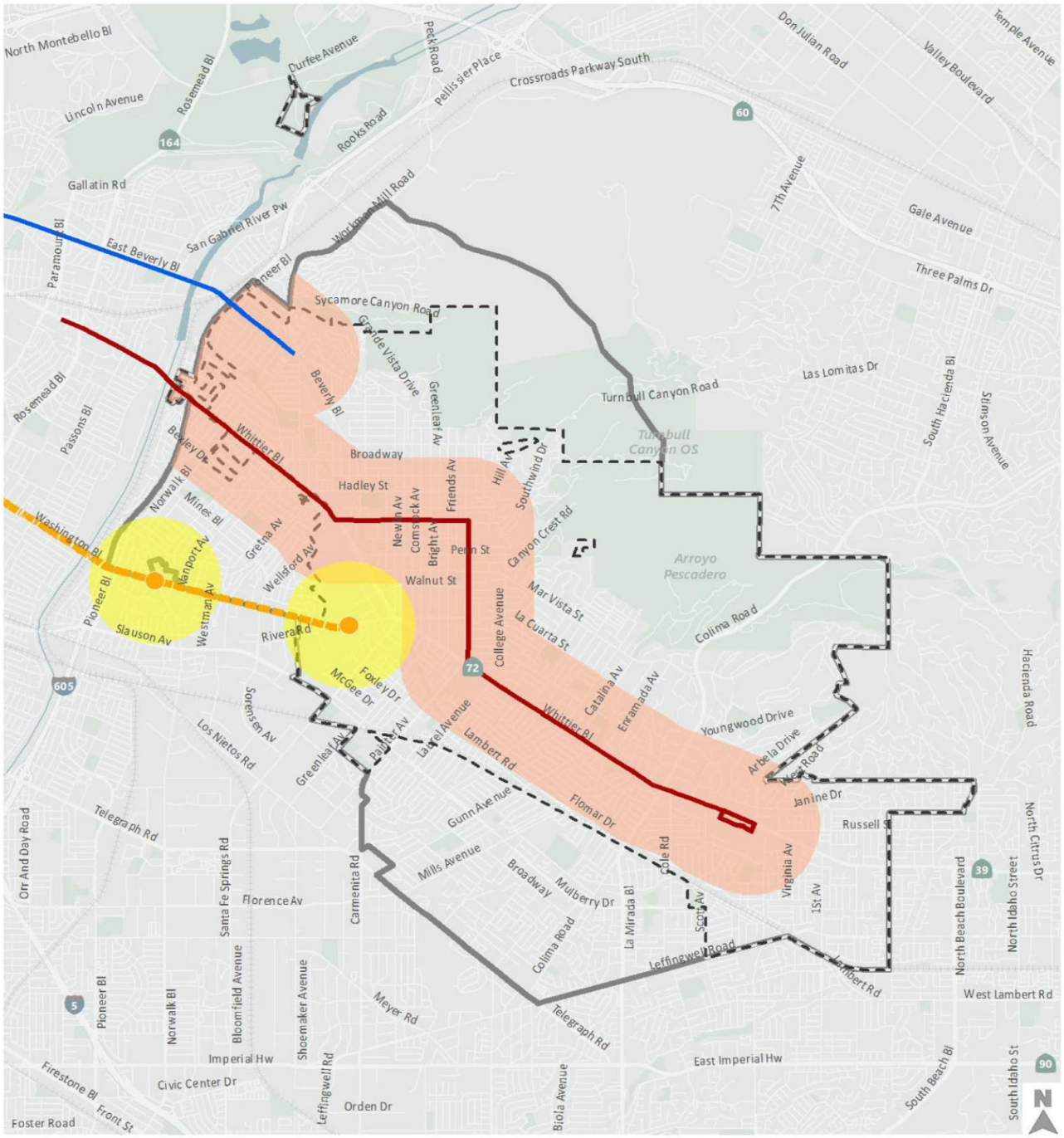

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Exhibit 4.17-5 Existing Future Transit Priority Areas

Whittier General Plan Update
Whittier, California

FIGURE XVII-4

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Existing Future Transit Priority Areas

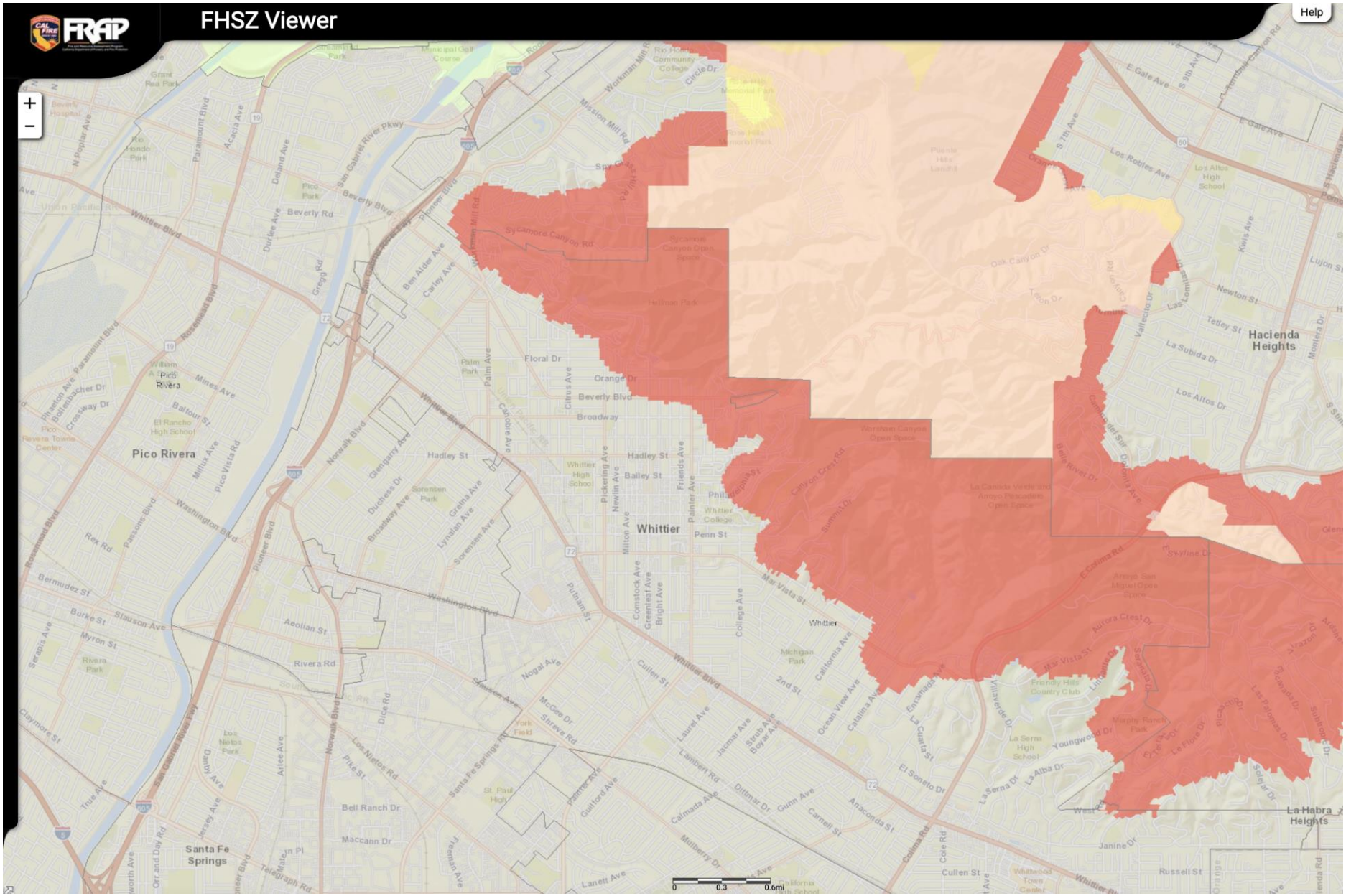

FIGURE XX-1

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Fire Hazard Severity Zones View (FHSZ)