Alhambra General Plan

Final Environmental Impact Report
SCH# 2017051085

prepared by

City of Alhambra
Community Development Department
111 South 1st Street
Alhambra, California 91801
Contact: Vanessa Reynoso, Deputy Director

prepared with the assistance of

Rincon Consultants, Inc.
180 North Ashwood Avenue
Ventura, California 93003

January 2019
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January 2019
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<td>O₃</td>
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µg/m³  micrograms per cubic meter
USEPA  United States Environmental Protection Agency
VOC  Volatile Organic Compound
VMT  vehicle miles travelled
WDR  Waste Discharge Requirements
Executive Summary

This section summarizes the characteristics of the proposed City of Alhambra General Plan Update, entitled Vision 2040 – A Community Mosaic, project alternatives, and the project’s environmental impacts.

Project Synopsis

Project Proponent

City of Alhambra
111 South 1st Street
Alhambra, California 91801

General Plan Synopsis

The proposed project is an update of the City of Alhambra General Plan, hereafter referred to as the Plan. The Plan is the first comprehensive update of the City’s General Plan since 1987 and establishes the community’s vision for the development in the City through the year 2040. The City’s existing General Plan was developed in accordance with the provisions of state law in effect at the time. The Plan reflects and includes updated information relating to current relevant state law. It also provides comprehensive policies for the entire City relating to land use/community design, mobility, quality of life, resources, services and infrastructure, and health and safety.

The Plan is organized into seven chapters, which include an introduction and six topical chapters. Implementation actions designed to help achieve these goals and policies are contained in a separate document, available upon request from the City, and also included as Appendix B of this EIR. The six Plan topical chapters encompass all of the elements required by California General Plan law, which include Land Use, Open Space, Conservation, Housing, Circulation, Safety, and Noise, as well as several optional elements.

The goal of the Plan is to maintain stable residential neighborhoods, enhance commercial corridors, establish industrial and commercial districts that meet local demand, and continue to beautify the community with improved streetscapes, gateways, and parks, while improving opportunities for walking and biking to a variety of destinations. Policies contained in the various Plan components reflect these goals. The Plan Land Use map, shown in Figure 5, provides an overview of the envisioned future City structure.

Alternatives

As required by CEQA, this section evaluates a range of alternatives to the proposed project. Alternatives analyzed in Section 6 include the following:

- No Project (current General Plan)
- Relocated Focus Area
Each of the alternatives discussed in this section has certain advantages and disadvantages as compared to the proposed Plan, as described below.

- **No Project (Current General Plan).** The No Project alternative involves continued implementation of the City’s current General Plan. This alternative assumes that existing General Plan policies would continue to facilitate development in accordance with existing land use designations. The overall amount of growth anticipated to occur under the current General Plan is roughly equivalent to what could be facilitated under the proposed Plan; therefore, population growth within the city under this alternative would also be expected to reach the SCAG forecast of 88,000 by 2040.

  While the Plan preserves the existing pattern of uses in most of the City and provides for protection of established neighborhoods, it also identifies focus areas that offer unique characteristics and may provide opportunities to transition over time with adjustments in land use, beautification, and place making. In contrast, the No Project Alternative would continue to facilitate development in the same pattern as is currently seen in the City, as reflected in the City’s current Land Use Policy Map.

  Under the Plan, new development would generally result from re-use of properties, conversion of uses in response to market demand (e.g., select industrial to commercial), and more intense use of land in defined areas. While new development under the No Project Alternative would also result from re-use of properties and conversion of uses in response to market demand, this alternative would not include the focus areas included under the Plan. Therefore, rather than potentially creating more intense use of land in the geographically well-defined focus areas, the same amount of new, market-driven development would occur, but would be more likely to be spread out across a wider area of the City, and without the adjustments in land use, beautification, and place making included in the Plan.

- **Relocated Focus Area** The Relocated Focus Area Alternative involves shifting the location of one of the focus areas identified in the Plan, in an attempt to avoid growth-related impacts in certain areas. In particular, this alternative is designed to avoid or lessen the Plan’s significant and unavoidable traffic impacts, which occur at 20 out of 21 intersections that would be significantly impacted by the Plan (compared to existing conditions), with impacts at the other one of these significantly impacted intersections being mitigable. The Plan would also have significant and unavoidable LOS impacts to the operation of the I-10 freeway corridor and on- and off-ramps.

  Given the fact that 14 of the 21 significantly impacted intersections would occur in the southern half of Alhambra (on or south of Mission Road), and the I-10 freeway corridor and on- and off-ramps are also located in the southern half of Alhambra, this alternative involves relocating one of the Plan focus areas located in the southern half of Alhambra to the northern half of Alhambra. The East Valley Boulevard Entertainment District focus area was chosen as the focus area to be moved, since it is near several significantly impacted intersections along Garfield Avenue and Valley Boulevard, and because the new hotel and entertainment uses that could be encouraged by this focus area could have relatively high trip generation potential compared to existing uses.

  Under this alternative, this focus area would be relocated to West Main Street. West Main Street was chosen because it is located in the northern half of Alhambra and it is a major thoroughfare with commercially-designated land and ample right of way for both vehicles and other modes of travel.
Executive Summary

- **Environmentally Superior Alternative** Neither of the studied alternatives would, overall, be environmentally superior to the Plan, although the No Project Alternative would be incrementally superior compared to the Plan in the areas of Population and Housing and Transportation/Traffic. When the two alternatives are compared to each other, the No Project Alternative would be environmentally superior to the Relocated Focus Area Alternative because it would alleviate Plan impacts in the areas of Population and Housing and Transportation/Traffic, while the Relocated Focus Area Alternative would not alleviate Plan impacts in any environmental impact area.

- **Alternatives Considered But Rejected** The following alternatives were considered, but rejected because they either did not meet the objectives of the project, would not be feasible, or would not avoid or substantially lessen one or more significant effects of the proposed project:
  - **No Growth/Reduced Growth.** The No Growth option is a version of the CEQA-required “No Project” alternative, but instead of buildout of the currently-adopted General Plan, it would mean no more development compared to current conditions. The Reduced Growth option would limit the amount of growth that could occur in Alhambra. Both options were determined to be infeasible. The No Growth option is not realistic because some development in Alhambra is already allowed under existing land use designations and zoning, and in some cases may have already received approvals or other entitlements. The No Growth option would require a growth moratorium ordinance that would restrict property development rights that already exist under existing policies and regulations, which could raise issues related to property rights and takings. The Reduced Growth option would require some sort of growth control since the forecast of growth for the proposed General Plan is based on SCAG forecasts and because, as proposed, the General Plan would not allow growth beyond that which could occur under the current General Plan. Additionally, the No Growth option would not meet three out of four of the Plan’s objectives, which are listed in Section 2.3.1 of this EIR, and the Reduced Growth option would likely meet these objectives to a lesser degree than under the proposed General Plan.
  - **Convert the Alhambra Golf Course to a Public Park.** Some members of the public suggested during the EIR scoping process that the City convert the Alhambra Golf Course, which is located within Almansor Park, to provide more public park space to the community. This alternative would not, however, avoid or substantially lessen any significant effects of the proposed project, because a lack of public park space has not been identified as a significant environmental impact in this EIR. The Plan includes policies to encourage the creation of new recreational and park spaces. Additionally, while there is a fee to use it, the golf course is open to the public (Alhambra Golf Course, February 2018), and replacing it with another use would eliminate the only public golf course in Alhambra.
  - **No Linear Park Over Railway Trench.** Some members of the public suggested during the EIR scoping process that the Plan should not include policies to construct a linear park over the existing railway trench along Mission Road, citing concerns that this facility would expose its users to safety hazards or localized air quality impacts from their proximity to trains. This alternative would not, however, avoid or substantially lessen any significant effects of the proposed project as identified in this EIR. Based on community input, the linear park has been removed from the General Plan. In response to community input, the linear park has been removed from the Plan.
Alternatives for Alleviating Traffic Congestion. Some members of the public suggested alternative ideas for alleviating traffic congestion impacts during the EIR scoping process. These ideas included more high-frequency transit to Cal State LA and South Pasadena, and giving up street lane space (road diet) for bikeways. There is no evidence that either of these alternatives would avoid or substantially lessen any significant effects of the proposed project as identified in this EIR and, depending on which roads it was applied to, the road diet alternative might also reduce capacity for automobiles on these roads to the point where significant traffic congestion impacts could occur at some intersections.

No other alternatives were identified that would feasibly attain most of the basic project objectives, but also avoid or substantially lessen the significant effects of the project.

Summary of Impacts and Mitigation Measures

Table 1 summarizes the environmental impacts of the Plan, proposed mitigation measures, and residual impacts. Impacts are categorized by their severity. Significant and Unavoidable impacts require a statement of overriding considerations to be issued per Section 15093 of the State CEQA Guidelines if the project is approved. Impacts classified as Less Than Significant with Mitigation are significant adverse impacts that can be feasibly mitigated to a less than significant level and that require findings to be made under Section 15091 of the State CEQA Guidelines. Less than Significant impacts are those that do not exceed identified thresholds and do not require findings.
Table 1  Summary of Impacts, Mitigation Measures, and Significance after Mitigation

<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Aesthetics</strong></td>
<td></td>
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<tr>
<td><strong>Impact AES-1</strong>: Implementation of the Plan would result in new land uses that may affect Plan area scenic vistas, but the Plan contains policies specifically designed to protect scenic vistas. Therefore, impacts would be less than significant.</td>
<td>None required beyond compliance with applicable Plan policies.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Impact AES-2</strong>: Implementation of the Plan would result in new land uses that may affect scenic resources in the city. However, the Plan contains policies specifically designed to protect scenic resources. Impacts would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Impact AES-3</strong>: While development under the Plan could change the visual character and quality of portions of the City, the Plan contains goals and policies specifically designed to protect areas of high visual character and quality and improve areas of low visual character and quality. Impacts would be less than significant.</td>
<td>None required beyond compliance with applicable Plan policies.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Impact AES-4</strong>: New development under the Plan could increase light and glare effects on sensitive receptors, such as residential uses, in certain areas of the City by intensifying development in certain focus areas not identified previously as such under the existing General Plan. However, these focus areas are already developed with and designated for urban uses, and new development in these areas would be subject to Plan policies and the City’s existing regulations governing light and glare. Therefore, the Plan would not in itself substantially increase light and glare beyond levels already allowed under the current General Plan. Impacts would be less than significant.</td>
<td>None required beyond compliance with applicable Plan policies.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Air Quality</strong></td>
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<tr>
<td><strong>Impact AQ-1</strong>: Development facilitated by the Plan would result in an increase in air pollutant emissions in the Los Angeles County portion of the South Coast Air Basin. Although growth facilitated by the Plan could accommodate up to about 1,878 new residents, growth would be consistent with SCAG forecasts. Implementation of policies contained in the Plan that promote re-use, infill, and mixed-use development would help limit emissions to levels consistent with regional forecasts. Impacts would less than significant.</td>
<td>None required beyond adherence to adopted policies in the 2016 AQMP and the Plan.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Impact AQ-2</strong>: Individual development projects facilitated by the Plan would generate construction-related emissions. Such emissions may result in temporary adverse impacts to local air quality. Implementation of Plan policies and compliance with existing regulations would reduce construction-related emissions to a less than significant level. This impact would be less than significant.</td>
<td>None required beyond applicable Plan policies and SCAQMD rules.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Impact AQ-3</strong>: The Plan would not increase the volume of traffic at any one intersection by the 24,000 to 44,000 vehicles per hour required to generate a CO hot spot. Therefore, impacts relating to CO “hot spots” would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
</tr>
</tbody>
</table>
### Impact AQ-4
- **Description:** Implementation of the Plan would facilitate development of projects that have the potential to cause odor impacts, but would not itself create objectionable odors that would affect a substantial number of people. Impacts would be less than significant.  
- **Mitigation Measure:** None required beyond adherence to SCAQMD rules.  
- **Significance After Mitigation:** Less than significant without mitigation.

### Cultural and Tribal Cultural Resources

#### Impact CUL-1
- **Description:** The City of Alhambra does not currently have any registered historical resources, but the City has several locations that meet eligibility requirements for the NRHP and/or the CRHR. As identified in the Plan, the locations of City historical resource importance and the overall unique characteristics of the City are proposed to be enhanced and locally recognized rather than altered by the Plan. Therefore, impacts related to historical resources would be less than significant.  
- **Mitigation Measure:** None required because Plan goals, policies, and associated actions would avoid impacts to historical resources.  
- **Significance After Mitigation:** Less than significant without mitigation.

#### Impact CUL-2
- **Description:** Plan policies would encourage identification and preservation of previously undiscovered archaeological resources. Therefore, the Plan's impact on archaeological resources would be less than significant.  
- **Mitigation Measure:** None required because Plan policies and applicable regulations, including the required Native American consultation, would address potential impacts.  
- **Significance After Mitigation:** Less than significant without mitigation.

#### Impact CUL-3
- **Description:** Plan policies would encourage identification and preservation of previously undiscovered unique paleontological resources within rock units or geologic features. Therefore, impacts would be less than significant.  
- **Mitigation Measure:** None required because Plan policies would address potential impacts.  
- **Significance After Mitigation:** Less than significant without mitigation.

#### Impact CUL-4
- **Description:** Plan policies and applicable regulations would help reduce the potential for ground-disturbing activities associated with development under the Plan to result in damage to or destruction of human burial grounds. Therefore, impacts would be less than significant.  
- **Mitigation Measure:** None required because federal and state policies and regulations would address potential impacts.  
- **Significance After Mitigation:** Less than significant without mitigation.

#### Impact CUL-5
- **Description:** There are currently no listed or eligible tribal cultural resources in the Plan Area. Letters requesting consultation were sent to tribal contacts during development of the Plan, as required by State law, but no responses were received. Because no tribal cultural resources have been identified, and because the regulations requiring this process would continue to apply to future activities facilitated by the Plan, impacts to tribal cultural resources would be less than significant.  
- **Mitigation Measure:** None required because the Plan Area does not contain any identified tribal cultural resources, State-required Native American consultation processes have been carried out for the proposed project and would continue to be required, as applicable, to future projects.  
- **Significance After Mitigation:** Less than significant without mitigation.

### Geology and Soils

#### Impact GEO-1
- **Description:** Future seismic events could produce ground shaking in the Plan Area that could damage structures and/or create adverse health and safety effects. However, with implementation of Plan policies and required building codes, impacts would be less than significant.  
- **Mitigation Measure:** None required beyond compliance with applicable Plan policies and provisions of applicable building codes.  
- **Significance After Mitigation:** Less than significant without mitigation.

#### Impact GEO-2
- **Description:** Future seismic events are unlikely to result in liquefaction and lateral spreading of soils in the Plan Area. Additionally, development in the Plan Area would be subject to compliance with applicable building codes. Impacts would be less than significant.  
- **Mitigation Measure:** None required beyond compliance with applicable Plan policies and provisions of applicable building codes.  
- **Significance After Mitigation:** Less than significant without mitigation.
## Impact GEO-3: The southern and northwestern parts of Alhambra contain slopes that present moderate to severe slope stability hazards. Landslides have the potential to damage and destroy structures, roadways and other improvements, as well as to deflect and block drainage channels, causing further damage and erosion. Compliance with applicable building codes would generally address landslide hazards. As described in the Plan policies, project-specific mitigation measures would ensure that sites are remediated in accordance with City requirements to ensure appropriate safety levels. Impacts would be Less than significant.

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
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</thead>
<tbody>
<tr>
<td>None required beyond compliance with applicable Plan policies and provisions of applicable building codes.</td>
<td>Less than significant without mitigation.</td>
</tr>
</tbody>
</table>

## Impact GEO-4: Development facilitated by the Plan may result in the construction of structures on expansive soils that could create a substantial risk to life or property. All new development would be required to comply with the standards of the CBC, however, which would ensure that expansive soils are remediated or that foundations and structures are engineered to withstand the forces of expansive soil. Compliance with the requirements of the CBC would reduce this impact to a less than significant level.

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<td>None required beyond compliance with applicable Plan policies and provisions of applicable building codes.</td>
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</table>

## Impact GEO-5: All of Alhambra is connected to sewer systems that are tied directly to the facilities of the Sanitation Districts of Los Angeles County (LACSD). The City does not use septic tanks or alternative wastewater disposal systems. Therefore, the Plan would have no impact related to soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
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</thead>
<tbody>
<tr>
<td>None required because the City does not rely on septic sewer systems or alternative wastewater disposal systems.</td>
<td>No impact without mitigation.</td>
</tr>
</tbody>
</table>

## Greenhouse Gases

## Impact GHG-1: Development facilitated by the Plan would generate approximately 4.0 MT CO\(_2\)e per capita of GHG emissions by the horizon year of 2040, which does not exceed the 4.0 MT CO\(_2\)e per-capita threshold consistent with statewide targets. In addition, policies contained in the Plan to promote transit-oriented infill development and provide incentives for high-performance buildings and infrastructure would reduce overall per capita GHG emissions within Alhambra. Impacts would be less than significant.

<table>
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<tr>
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</tbody>
</table>

## Impact GHG-2: The Plan would be consistent with the major initiatives contained in SCAG’s 2016-2040 RTP/SCS to reduce GHG emissions per capita by eight percent by 2020, 18 percent by 2035, and 21 percent by 2040, all compared to 2005 levels. Additionally, the Plan would be consistent with the City’s EECAP, reducing baseline 2005 GHG Emissions per capita by 15 percent by 2020. Impacts would be less than significant.

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<tr>
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</tbody>
</table>

## Hazards and Hazardous Materials

## Impact HAZ-1: Development facilitated by the Plan could result in an increase in the overall routine transport, use, storage, and disposal of hazardous materials within the City. However, compliance with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of public exposure to these substances. This impact would be less than significant.

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
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</tbody>
</table>
## City of Alhambra
### Alhambra General Plan

<table>
<thead>
<tr>
<th>Impact HAZ-2: Development facilitated by the Plan could potentially result in the release of hazardous materials into the environment through reasonably foreseeable upset and accident conditions. However, compliance with existing regulations and Plan policies would minimize the risk of exposure to these substances. This impact would be less than significant.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact HAZ-3: Construction and operation of certain future land uses facilitated by the Plan, primarily general and automotive commercial uses along Main Street and industrial uses in the Fremont and Mission Regional Commercial/Industrial Hubs, could emit hazardous emissions or handle acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. However, compliance with existing regulatory requirements and Plan policies would minimize the risks to schools and students. Impacts would be less than significant.</td>
</tr>
<tr>
<td>Impact HAZ-4: Sites included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 are present in the City and could be subject to development under the Plan. Development at these sites could create a hazard to the public or the environment; however, implementation of state and local regulations and Plan policies would address this issue and this impact would be less than significant.</td>
</tr>
<tr>
<td>Impact HAZ-5: Implementation of the Plan would not result in an increase in people residing or working within two miles of a public airport, but could result in an increase in people residing or working within two miles of privately owned heliports. Compliance with existing regulations, the California Airport Land Use Compatibility Plan, and 14 CFR 77 would reduce potential safety impacts to a less than significant level.</td>
</tr>
<tr>
<td>Impact HAZ-6: Policies included in the Plan address implementation of adopted emergency response and evacuation plans. Therefore, Plan would not result in interference with these types of adopted plans. Impacts would be less than significant.</td>
</tr>
</tbody>
</table>

### Hydrology and Water Quality

<table>
<thead>
<tr>
<th>Impact HWQ-1: Development facilitated by the Plan could increase pollutants in stormwater and wastewater, but Plan policies and existing regulations would ensure that water quality standards and waste discharge requirements would not be violated. Therefore, impacts to water quality would be less than significant.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact HWQ-2: Development facilitated by the Plan would incrementally increase the amount of impervious surfaces in the city, resulting in an increase in runoff and decrease in percolation to the main San Gabriel Groundwater Basin. However, with implementation of Plan policies and existing regulations, impacts related to the increase in impervious surfaces would be less than significant.</td>
</tr>
<tr>
<td>Impact HWQ-3: Development facilitated by the Plan could alter the existing drainage pattern in some parts of the Plan Area. However, implementation of goals and policies included in the Plan, and enforcement of existing regulations, would protect the City’s existing drainage pattern from substantial alteration and minimize erosion and siltation from such activities. These impacts would therefore be less than significant.</td>
</tr>
</tbody>
</table>
## Executive Summary

### Final Environmental Impact Report

### Impact HWQ-4: With implementation of plan policies and existing regulations, the Plan would not substantially alter drainage patterns or create or contribute runoff that would result in downstream flooding, stormwater drainage exceedances, or increases in polluted runoff.

**Mitigation Measure:** None required because Plan policies would reduce impacts to a less than significant level.

**Significance After Mitigation:** Less than significant without mitigation.

### Impact HWQ-5: Development facilitated by the Plan would not place housing, structures, or people within a 100-year flood zone, expose people or structures to significant risk or loss, injury or death as a result of failure of a levee or dam or inundation by seiche, tsunami, or mudflow. With implementation of Plan policies, potential flooding impacts would be less than significant.

**Mitigation Measure:** None required because Plan policies would reduce impacts to a less than significant level.

**Significance After Mitigation:** Less than significant without mitigation.

### Land Use and Planning

### Impact LU-1: Because the Plan and its policies are consistent with SCAG’s RCP and RTP/SCS, the Plan would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. Impacts would be less than significant.

**Mitigation Measure:** None required.

**Significance After Mitigation:** Less than significant without mitigation.

### Noise

### Impact N-1: Construction-related activities associated with individual projects facilitated by the Plan would intermittently generate temporary construction noise levels and ground-borne vibration near noise-sensitive receptors in the City. However, such development facilitated by the Plan would comply with Plan policies for noise impacts, and adherence to the City’s Municipal Code Section 18.02.060 would limit construction activity to daytime hours and regulate impacts from groundborne vibration. Therefore, this impact would be less than significant.

**Mitigation Measure:** None required beyond compliance with the permitted construction hours in the City’s Municipal Code and implementation of Plan policies.

**Significance After Mitigation:** Less than significant without mitigation.

### Impact N-2: Traffic generated by new development facilitated by the Plan would increase citywide roadway noise levels and result in an increase in ambient noise levels at existing noise-sensitive receptors, such as residences. However, implementation of Plan policies would reduce this impact to a less than significant level.

**Mitigation Measure:** None required because Plan policies would reduce impacts to a less than significant level.

**Significance After Mitigation:** Less than significant without mitigation.

### Impact N-3: Traffic generated by new development facilitated by the Plan would result in an increase in ambient noise levels for new noise-sensitive receptors, such as residences. However, implementation of noise attenuation features in new development, as required by Plan policies, would reduce impacts to a less than significant level.

**Mitigation Measure:** None required because the Plan policies would reduce impacts to a less than significant level.

**Significance After Mitigation:** Less than significant without mitigation.

### Population and Housing

### Impact PH-1: Implementation of the Plan would redistribute rather than induce growth compared to SCAG population and employment forecasts. There would be no direct or indirect growth inducement impact.

**Mitigation Measure:** None required.

**Significance After Mitigation:** No impact without mitigation.

### Impact PH-2: Development facilitated by the Plan would add about 1,842 net housing units to the City’s housing stock and a projected population increase of 1,878 by 2040. The number of existing housing units that could be displaced would be less than the projected number of new housing units developed, and therefore no significant housing or population displacement would occur, making this impact less than significant.

**Mitigation Measure:** None required.

**Significance After Mitigation:** Less than significant without mitigation.
### Impact

<table>
<thead>
<tr>
<th>Impact PS-1: Development facilitated by the Plan would increase the city’s population and density of development, and could increase demand for fire protection and emergency medical services, but would not create the need for new fire protection facilities. Compliance with applicable codes and regulations and compliance with Plan goals and policies would reduce potential impacts related to fire protection and emergency medical services to a less than significant level.</th>
<th>None required.</th>
<th>Less than significant without mitigation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact PS-2: Development facilitated by the Plan would increase demand for police protection service, but would not result in the need to construct new police facilities. Impacts would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td>Impact PS-3: Development facilitated by the Plan could result in an increase in student enrollment. However, schools in Alhambra have adequate capacity to serve the additional students. Impacts would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td>Impact PS-4: Development forecast to occur through 2040 would increase the City’s population by 1,878 residents (about two percent), thus incrementally increasing demand for open space and recreational facilities. Since Alhambra is built out, space for recreational facilities is limited. However, recreational needs can be met by developing small vacant lands with pocket parks, increased use of schools and other facilities, and the possible development of a new regional park in the I-710 right-of-way. Based on the limited growth anticipated and available means to enhance recreational opportunities, impacts related to the physical deterioration of recreational facilities would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td>Impact PS-5: Anticipated growth through 2040 would increase the City’s population by about two percent, with a proportionate increase in demand on parks and recreation facilities. Development of park sites identified in the Plan would incrementally increase the amount of parks, and implementation of the Plan’s bikeways map would provide bicycling and pedestrian infrastructure. Provision of these new parks and improved bicycling and pedestrian infrastructure would not result in significant, adverse physical effects on the environment. Environmental impacts related to the development of new parks would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td>Impact PS-6: The Alhambra Civic Center Library will meet the City’s library needs through 2040. Therefore, impacts related to the City’s library system would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
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</table>
### Executive Summary

**Transportation/Traffic**

<table>
<thead>
<tr>
<th>Impact</th>
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<th>Significance After Mitigation</th>
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<tbody>
<tr>
<td><strong>Impact T-1:</strong> Traffic generated as a result of development facilitated by the Plan would degrade operations at 21 intersections to below identified significance thresholds. Because feasible mitigation is not available at 20 of 21 intersections, impacts would be significant and unavoidable.</td>
<td>T-1 <strong>Fremont Avenue/Orange Street</strong></td>
<td>Implementation of Mitigation Measure T-1 would reduce the traffic delay caused by growth facilitated by the Plan, improving the amount of delay under the LOS D conditions of the Fremont Avenue/Orange Street intersection. However, because feasible mitigation measures are not available to address impacts at the other 20 study intersections, impacts would be significant and unavoidable.</td>
</tr>
<tr>
<td></td>
<td>Widen the westbound approach of the Fremont Avenue/Orange Street intersection to provide an additional lane for traffic.</td>
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<tr>
<td><strong>Impact T-2:</strong> Traffic generated by development facilitated by the Plan would degrade operations on the I-10 freeway corridor and on I-10 freeway off-ramps to below identified significance thresholds. Impacts would be significant and unavoidable.</td>
<td>T-2 <strong>I-10 Freeway Corridor and Off-Ramp Operations</strong></td>
<td>Implementation of Mitigation Measure T-2 would reduce LOS impacts to the operation of the I-10 freeway corridor and off-ramps by future development in the Plan Area. However, because specific improvements have not been identified, and because the I-10 freeway and its ramps are State facilities controlled by Caltrans, the City cannot guarantee that any improvements, if necessary, would be carried out in these locations. This impact would therefore remain significant and unavoidable.</td>
</tr>
<tr>
<td></td>
<td>Future major projects within the Plan Area shall be reviewed for both localized impacts that overlap with identified locations of potential I-10 freeway corridor and off-ramp significant impacts. Projects that make a substantial contribution to a significant impact in these locations must make a fair-share contribution to freeway corridor improvements planned by Caltrans.</td>
<td></td>
</tr>
<tr>
<td><strong>Impact T-3:</strong> Because the Plan would contribute more than 50 vehicle trips to the CMP arterial monitoring intersection of Fremont Avenue and Valley Boulevard, implementation of the Plan would conflict with an applicable congestion management program. Because there are no feasible mitigation measures at this intersection, this impact would be significant and unavoidable.</td>
<td></td>
<td>Although implementation of Mitigation Measure T-2 would reduce Plan impacts to the operation of the mainline of the I-10 freeway corridor, this impact would remain significant and unavoidable. There are no feasible mitigation measures to mitigate the Plan’s significant impacts at the CMP arterial monitoring intersection of Fremont Avenue and Valley Boulevard, and impacts at this location would therefore be significant and unavoidable.</td>
</tr>
<tr>
<td></td>
<td>There are no feasible mitigation measures at the CMP arterial monitoring intersection of Fremont Avenue and Valley Boulevard, and cumulative impacts would remain significant and unavoidable. Freeway mainline impacts would need to be mitigated through implementation of Mitigation Measure T-2, which requires fair-share contributions by future developments permitted by the Plan to freeway corridor improvements planned by Caltrans.</td>
<td></td>
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<tr>
<td>Impact</td>
<td>Mitigation Measure</td>
<td>Significance After Mitigation</td>
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<tr>
<td><strong>Impact T-4:</strong> Due to the lack of airports in the immediate vicinity of Alhambra, the Plan would not affect air traffic patterns. Impacts would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Impact T-5:</strong> Due to plan policies to improve safety, and City design standards already in place to ensure safe access and circulation, the plan would not substantially increase hazards due to a design feature or incompatible use. Impacts would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Impact T-6:</strong> Implementation of the Plan would not result in inadequate emergency access, given compliance with applicable local and State requirements regarding adequate emergency access. Impacts would less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Impact T-7:</strong> Implementation of the Plan would generally enhance the use of alternative transportation modes, including transit, bicycling, and walking. Impacts would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
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</table>

**Utilities and Service Systems**

<table>
<thead>
<tr>
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<tbody>
<tr>
<td><strong>Impact U-1:</strong> Development facilitated by the Plan would increase water demand by an estimated 1.09 mgd, which would not exceed projected available water supplies, provided through current water supply sources and treatment facilities, by 2040. Therefore, impacts related to water supply and treatment facilities would be less than significant.</td>
<td>None required because compliance with Plan policies would reduce the Plan's impacts to water supplies and facilities to a less than significant level.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Impact U-2:</strong> Development facilitated by the Plan would increase wastewater generation by an estimated 1,042,541 gallons per day or 1.04 million gallons per day at the wastewater treatment plants serving the City, which have a combined total excess capacity of 171.4 million gallons per day. Therefore, wastewater impacts would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Impact U-3:</strong> Development facilitated by the Plan would increase demand for stormwater conveyance, but policies to encourage low impact development and best management practices would limit any impact. Therefore, environmental impacts from construction of new stormwater drainage facilities or expansion of existing facilities would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Impact U-4:</strong> Development facilitated by the Plan would incrementally reduce the lifespan of the fourteen landfills currently utilized by the city. However, the City’s current 65 percent diversion rate would reduce solid waste directed toward these landfills, which have sufficient capacity to accommodate the increase in solid waste generation that is projected to occur under the Plan. Therefore, environmental impacts from the increase in solid waste generated by new development would be less than significant.</td>
<td>None required.</td>
<td>Less than significant without mitigation.</td>
</tr>
</tbody>
</table>
1 Introduction

This Environmental Impact Report (EIR) examines the potential environmental effects of the proposed City of Alhambra General Plan Update, entitled Vision 2040 – A Community Mosaic, (the Plan). The General Plan, the California Environmental Quality Act (CEQA) environmental review process, and the legal basis for preparing an EIR are described below.

1.1 Environmental Impact Report Background

This document is a Final EIR that evaluates the potential environmental effects associated with implementation of the Plan, a document that establishes the community’s vision for future development of the City and provides comprehensive policies for the entire City relating to land use/community design, mobility, quality of life, resources, services and infrastructure, and health and safety.

This section (1) provides an overview of the background behind the Plan; (2) describes the purpose of and legal authority of the document; (3) summarizes the scope and content of the EIR; (4) lists lead, responsible, and trustee agencies for the EIR; (5) describes the intended uses of the EIR; and (6) provides a synopsis of the environmental review process required under CEQA.

The contents of other EIR sections are as follows:

- **Section 2, Project Description**, provides a detailed discussion of the Plan
  - Section 3, Environmental Setting, describes the general environmental setting for Alhambra
  - Section 4, Environmental Impact Analysis, describes the potential environmental effects associated with implementation of three alternatives
  - Section 5, Other CEQA Requirements, discusses other issues required to be analyzed under CEQA such as growth inducement, significant irreversible environmental effects, and factors found to be less than significant
  - Section 6, Alternatives, discusses alternatives to the Plan, including the CEQA-required “no project” alternative
  - Section 7, References and Preparers, lists informational sources for the EIR and persons involved in the preparation of the document
  - Section 8, Responses to Comments on the Draft EIR, includes comment letters that the City received on the Draft EIR and responses to those comments.

1.1.1 Overview of General Plan Update

The last comprehensive update of the City’s General Plan was adopted in 1987. The City is proposing a new comprehensive update of the General Plan (the Plan) that will need to be reviewed and recommended for adoption by the City’s Planning Commission, and that also requires discretionary approval by the City Council.

State law (Government Code Section 65300) requires that each city and county adopt a comprehensive general plan. The proposed project fulfills this requirement by updating the City’s
existing General Plan, last comprehensively updated in 1987. The Plan defines the framework by which the City’s physical and economic resources are to be managed and used in the future. The Plan clarifies and articulates the City’s intentions for Alhambra’s future, with respect for the rights and expectations of the community including residents, property owners, and businesses. Through the Plan, the City informs these groups of its goals, policies, and standards, which are designed to achieve the community’s objectives. The Plan’s planning horizon is the year 2040.

Since a general plan is the constitution for future development, any decision by a city affecting land use and development must be consistent with its adopted general plan. This includes any future development projects proposed and approved. An action, program, or project would be considered consistent with the general plan if, considering all of its aspects, it will further the objectives and policies outlined in the general plan or not obstruct their attainment.

Each chapter of the Plan includes a statement of the overarching purpose for that chapter and a list of goals and policies meant to achieve that purpose. The overarching purpose is a vision statement that gives general direction for the chapter. Goals are defined as specified ends that help achieve the overarching vision. Policies are specific statements that guide decision-making. These goals and policies are statements adopted by the City Council that help implement the vision of Alhambra that the Plan seeks to achieve. They also provide protection for the City’s resources by establishing planning requirements, programs, standards, and criteria for project review. Goals and policies may refer to existing programs or call for establishment of new ones.

1.1.2 Purpose and Legal Authority

This EIR has been prepared in accordance with CEQA and the state CEQA Guidelines. In accordance with Section 15121 (a) of the state CEQA Guidelines (California Code of Regulations (CCR), Title 14, Division 6, Chapter 3), the purpose of an EIR is to inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

This EIR fulfills the requirements for a program EIR. Although the legally required contents of a program EIR are the same as those of a project EIR, program EIRs are typically more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a project EIR. As provided in Section 15168 of the state CEQA Guidelines, a program EIR may be prepared on a series of actions that may be characterized as one large project. Use of a program EIR provides the City (as Lead Agency) with the opportunity to consider broad policy alternatives and program-wide mitigation measures, and provides the City with greater flexibility to address environmental issues and/or cumulative impacts on a comprehensive basis.

 Agencies generally prepare program EIRs for programs or a series of related actions that are linked geographically; are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or are individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways. By its nature, a program EIR considers the “macro” effects associated with implementing a program (such as a general plan or specific plan) and does not, and is not intended to, examine the specific environmental effects associated with particular projects that may be implemented under general or specific plans.

Once a program EIR has been prepared, subsequent activities in the program must be examined in the light of that program EIR to determine what, if any, additional CEQA documentation needs to be prepared. If the program EIR addresses the program’s effects as specifically and comprehensively as
Introduction

possible, many subsequent activities could be found to be within the scope of the program EIR and additional environmental documents may not be required (CEQA Guidelines Section 15168(c)). When a lead agency relies on a program EIR for a subsequent activity, it must incorporate applicable mitigation measures and alternatives developed in the program EIR into the subsequent activities (CEQA Guidelines Section 15168(c)(3)). If a subsequent activity would have effects not identified in the program EIR, the lead agency must prepare a new initial study leading to a “Negative Declaration, Mitigated Negative Declaration” or a project-level EIR. In this case, the program EIR still serves a valuable purpose as the first-tier environmental analysis. The CEQA Guidelines (Section 15168(h)) encourage the use of program EIRs, citing five advantages:

1. Provision of a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR
2. Focus on cumulative impacts that might be slighted in a case-by-case analysis
3. Avoidance of continual reconsideration of recurring policy issues
4. Consideration of broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them
5. Reduction of paperwork by encouraging the reuse of data (through tiering)

As a “macro” level environmental document, the program EIR uses macro-level thresholds rather than the project-level thresholds that might be used for an EIR on a specific development project. It should not be assumed that impacts determined not to be significant at a macro level would not be significant at a project level. In other words, determination that implementation of the Plan as a “program” would not have a significant environmental effect does not necessarily mean that an individual project would not have significant effects based on project-level CEQA thresholds, even if the project is consistent with the Plan.

This EIR has been prepared to analyze potentially significant environmental impacts associated with future development resulting from implementation of the Plan and addresses appropriate and feasible mitigation measures or project alternatives that would minimize or eliminate these impacts. Additionally, this EIR will provide the primary source of environmental information for the City of Alhambra, the lead agency, to use when considering implementation of projects associated with the Plan.

This EIR is intended to provide decision-makers and the public with information that enables them to intelligently consider the environmental consequences of the proposed action. This EIR identifies significant or potentially significant environmental effects, as well as ways in which those impacts can be reduced to less than significant levels, whether through the incorporation of mitigation measures or through the implementation of specific alternatives to the project. In a practical sense, this document functions as a tool for fact-finding, allowing concerned citizens and agency staff an opportunity to collectively review and evaluate baseline conditions and project impacts through a process of full disclosure.

1.2 Scope and Content

In accordance with the CEQA Guidelines, a Notice of Preparation (NOP) of a Draft EIR was circulated to potentially interested parties on June 1, 2017. The NOP, included in Appendix A, indicated that all issues on the City’s environmental checklist would be discussed in the EIR. These include the following:
This EIR evaluates potential impacts in each of these areas. The focus of this EIR is to:

- Provide information about the Plan for consideration by City decision-makers in their selection of the proposed Plan, an alternative to the Plan, or a combination of various elements from the Plan and its alternatives, for approval
- Review and evaluate the potentially significant environmental impacts that could occur as a result of the growth and development envisioned in the Plan
- Identify feasible mitigation measures that may be incorporated into the Plan in order to reduce or eliminate potentially significant effects
- Disclose any potential growth-inducing and/or cumulative impacts associated with the Plan
- Examine a reasonable range of alternative growth scenarios (such as “no growth”/growth according to the existing General Plan, reduced growth, or growth in alternative locations) that could feasibly attain the basic objectives of the Plan, while eliminating and/or reducing some or all of its potentially significant adverse environmental effects

The City received 26 written responses to the NOP. The responses are included in Appendix A and are addressed, as appropriate, in the analysis contained in the various subsections of Section 4, Environmental Impact Analysis. The City also held a community workshop and EIR scoping meeting on June 14, 2017 at the Civic Center Library, with roughly 90 individuals attending the meeting. Table 2 summarizes the comments received, by topic, in the comment letters and at the Community Workshop/Scoping Meeting.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Where Topic is Addressed in EIR</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General Plan Scope and Description</strong></td>
<td>Section 2.3.1, Objectives of the General Plan Update</td>
</tr>
<tr>
<td>▪ Overarching goals of the General Plan</td>
<td></td>
</tr>
<tr>
<td><strong>Aesthetics</strong></td>
<td>Section 4.1, Aesthetics</td>
</tr>
<tr>
<td>▪ Linear park lamp design and enhancements</td>
<td></td>
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<tr>
<td>▪ Primary and secondary gateway signage</td>
<td></td>
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<tr>
<td>▪ Neighborhood lighting with residential input</td>
<td></td>
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<tr>
<td>▪ Uniformity of types of trees in City</td>
<td></td>
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<tr>
<td><strong>Cultural Resources</strong></td>
<td>Section 4.3 Cultural Resources</td>
</tr>
<tr>
<td>▪ Tribal Cultural Resources, AB 52, and SB 18</td>
<td></td>
</tr>
<tr>
<td>Topic</td>
<td>Where Topic is Addressed in EIR</td>
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<tr>
<td>-------------------------------------------</td>
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<tr>
<td><strong>Hazards and Hazardous Materials</strong></td>
<td><strong>Section 4.2, Air Quality</strong></td>
</tr>
<tr>
<td>▪ San Gabriel Valley Area 3 Superfund site vapor intrusion and contamination of water</td>
<td><strong>Section 4.6, Hazards and Hazardous Materials</strong></td>
</tr>
<tr>
<td>▪ Avoid damaging and building over any plugged and abandoned wells in the City (two located)</td>
<td><strong>Section 4.6, Hazards and Hazardous Materials</strong></td>
</tr>
<tr>
<td><strong>Land Use and Planning</strong></td>
<td><strong>Section 4.8, Land Use and Planning</strong></td>
</tr>
<tr>
<td>▪ “Spot Zoning”: Too many specific plans and general plan amendments</td>
<td><strong>Section 4.8, Land Use and Planning</strong></td>
</tr>
<tr>
<td>▪ Higher density/mixed use/walkable corridor for Main Street, towards Garfield</td>
<td><strong>Section 4.8, Land Use and Planning</strong></td>
</tr>
<tr>
<td>▪ High rise mixed use allowed at Fremont/Valley, Atlantic/Valley, and Garfield/Valley</td>
<td><strong>Section 4.8, Land Use and Planning</strong></td>
</tr>
<tr>
<td>▪ Use of vacant lots/foreclosed homes for pocket parks</td>
<td><strong>Section 4.8, Land Use and Planning</strong></td>
</tr>
<tr>
<td><strong>Population and Housing</strong></td>
<td><strong>Section 4.10, Population and Housing</strong></td>
</tr>
<tr>
<td>▪ Lack of affordable housing</td>
<td><strong>Section 2.3.6, City Growth/Buildout</strong></td>
</tr>
<tr>
<td>▪ Demographics and growth forecasts</td>
<td><strong>Section 2.3.6, City Growth/Buildout</strong></td>
</tr>
<tr>
<td><strong>Public Services</strong></td>
<td><strong>Section 4.11, Public Services</strong></td>
</tr>
<tr>
<td>▪ Open space statutes</td>
<td><strong>Section 4.11, Public Services</strong></td>
</tr>
<tr>
<td>▪ Open space to resident ratio</td>
<td><strong>Section 4.11, Public Services</strong></td>
</tr>
<tr>
<td>▪ Ensure open space is open to the public</td>
<td><strong>Section 4.11, Public Services</strong></td>
</tr>
<tr>
<td>▪ Better response time for the Police Department</td>
<td><strong>Section 4.11, Public Services</strong></td>
</tr>
<tr>
<td>▪ Dog-friendly parks</td>
<td><strong>Section 4.11, Public Services</strong></td>
</tr>
<tr>
<td>▪ No impact to LACoFD Facilities</td>
<td><strong>Section 4.11, Public Services</strong></td>
</tr>
<tr>
<td><strong>Transportation/Traffic</strong></td>
<td><strong>Section 4.12, Transportation/Traffic</strong></td>
</tr>
<tr>
<td>▪ Pedestrian safety</td>
<td><strong>Section 4.12, Transportation/Traffic</strong></td>
</tr>
<tr>
<td>▪ Rideshare/carpool for the community, alternatives to car use</td>
<td><strong>Section 4.12, Transportation/Traffic</strong></td>
</tr>
<tr>
<td>▪ Transportation corridors need increased capacity</td>
<td><strong>Section 4.12, Transportation/Traffic</strong></td>
</tr>
<tr>
<td>▪ Additional bike lanes</td>
<td><strong>Section 4.12, Transportation/Traffic</strong></td>
</tr>
<tr>
<td>▪ Consistency with SCAG RTP/SCS</td>
<td><strong>Section 4.12, Transportation/Traffic</strong></td>
</tr>
<tr>
<td>▪ Valley Boulevard use as subway route</td>
<td><strong>Section 4.12, Transportation/Traffic</strong></td>
</tr>
<tr>
<td>▪ Notification for impacts to bus operations and railroad right-of-ways</td>
<td><strong>Section 4.12, Transportation/Traffic</strong></td>
</tr>
<tr>
<td>▪ Transit-supportive public realm improvements</td>
<td><strong>Section 4.12, Transportation/Traffic</strong></td>
</tr>
<tr>
<td>▪ Use of VMT/LOS metrics</td>
<td><strong>Section 4.12, Transportation/Traffic</strong></td>
</tr>
<tr>
<td>▪ I-10 Freeway analysis</td>
<td><strong>Section 4.12, Transportation/Traffic</strong></td>
</tr>
<tr>
<td><strong>Utilities and Service Systems</strong></td>
<td><strong>Section 4.13, Utilities and Service Systems</strong></td>
</tr>
<tr>
<td>▪ No current sewer deficiencies in LACSD services</td>
<td><strong>Section 4.13, Utilities and Service Systems</strong></td>
</tr>
<tr>
<td><strong>Biological Resources</strong></td>
<td><strong>Section 4.15.2, Biological Resources</strong></td>
</tr>
<tr>
<td>▪ In favor of a tree ordinance for the City</td>
<td><strong>Section 4.15.2, Biological Resources</strong></td>
</tr>
<tr>
<td>▪ Protection of oak, native, and mature trees</td>
<td><strong>Section 4.15.2, Biological Resources</strong></td>
</tr>
<tr>
<td>▪ Placement of native trees along streetscapes</td>
<td><strong>Section 4.15.2, Biological Resources</strong></td>
</tr>
<tr>
<td>▪ Designation of City as a “Tree City”</td>
<td><strong>Section 4.15.2, Biological Resources</strong></td>
</tr>
<tr>
<td><strong>Economic, Employment, and Population Growth</strong></td>
<td><strong>Section 2.3.7 Employment Growth</strong></td>
</tr>
<tr>
<td>▪ Co-op work leases</td>
<td><strong>Section 2.3.6, City Growth/Buildout</strong></td>
</tr>
<tr>
<td>▪ Quality of life and economic development</td>
<td><strong>Section 2.3.6, City Growth/Buildout</strong></td>
</tr>
<tr>
<td>▪ Need for jobs and livable wages</td>
<td><strong>Section 5.2, Economic and Population Growth</strong></td>
</tr>
</tbody>
</table>
1.3 Lead, Responsible, and Trustee Agencies

The City of Alhambra is the lead agency under CEQA for this EIR because it has primary discretionary authority to determine whether or how to approve the Plan.

“Responsible agencies” are other agencies responsible for carrying out/implementing a specific component of the proposed project or for approving a project (such as an annexation) that implements the goals and policies of a general plan. Section 15381 of the CEQA Guidelines defines a “responsible agency” as:

A public agency which proposes to carry out or approve a project, for which a lead agency is preparing or has prepared an EIR or Negative Declaration. For purposes of CEQA, responsible agencies include all public agencies other than the lead agency that have discretionary approval authority over the project.

There are no responsible agencies for the Plan. Although no responsible agencies occur under CEQA, several other agencies have review authority over aspects of the Plan or approval authority over projects that could potentially be implemented in accordance with various objectives and policies included in the Plan. These agencies and their roles are listed below.

- The state geologist is responsible for the review of the City’s program for minimizing exposure to geologic hazards and for regulating surface mining activities.
- The California Department of Transportation (Caltrans) has responsibility for approving future improvements to the state highway system, including I-10 and Interstate 710 (I-710).
- California Department of Fish and Wildlife (CDFW) has responsibility for issuing take permits and streambed alteration agreements for any projects with the potential to affect plant or animal species listed by the State of California as rare, threatened, or endangered, or that would disturb waters of the state.
- The Metropolitan Transit Authority (Metro) is responsible for approving and implementing projects involving construction or remodeling of new or existing Metro facilities, such as Metro bus stops.
- The Los Angeles County Sanitation District treats wastewater from the City’s system and would therefore be responsible for approving and implementing improvements to wastewater infrastructure should they be required as a result of the Plan.

Trustee agencies have jurisdiction over certain resources held in trust for the people of California, but do not have legal authority to approve or carry out the project. CEQA Guidelines Section 15386 designates four agencies as trustee agencies: CDFW with regards to fish and wildlife, native plants designated as rare or endangered, game refuges, and ecological reserves; the State Lands Commission with regard to state-owned “sovereign” lands, such as the beds of navigable waters and state school lands; the California Department of Parks and Recreation with regard to units of the
state park system; and, the University of California with regard to sites within the Natural Land and Water Reserves System. The CDFW is the only trustee agency for the Plan EIR.

1.4 Environmental Review Process

The environmental impact review process required under CEQA is summarized below and illustrated in Figure 1. The steps appear in sequential order.

1 **Notice of Preparation (NOP).** After deciding that an EIR is required, the lead agency must file an NOP soliciting input on the EIR scope to "responsible," "trustee," and involved federal agencies; to the State Clearinghouse, if one or more state agencies is a responsible or trustee agency; and to parties previously requesting notice in writing (CEQA Guidelines Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. For projects of statewide or regional significance, the lead agency must hold a scoping meeting during the 30-day NOP review period to solicit public input on the issues to be assessed in the EIR. For other projects, a scoping meeting is not required, but may be conducted by the lead agency.

2 **Draft EIR.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) alternatives; g) mitigation measures; and h) irreversible changes.

3 **Public Notice and Review.** A lead agency must prepare a Public Notice of Availability of an EIR. The Notice must be placed in the County Clerk's office for 30 days (Public Resources Code Section 21092) and sent to anyone requesting it. Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must consult with and request comments on the Draft EIR from responsible and trustee agencies, and adjacent cities and counties. The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days, unless a shorter period is approved by the Clearinghouse (Public Resources Code 21091). Distribution of the Draft EIR may be required through the State Clearinghouse.

4 **Notice of Completion.** A lead agency must file a Notice of Completion with the State Clearinghouse as soon as it completes a Draft EIR.

5 **Final EIR.** A Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.

6 **Final EIR Certification.** The lead agency shall certify: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project.

7 **Lead Agency Project Decision.** Once the lead agency certifies the Final EIR, it must then make a decision on the project analyzed in the EIR. If a project has significant environmental effects, the lead agency may: a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and Statement of Overriding Considerations are adopted.
8 **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible. If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic or other reasons supporting the agency's decision.

9 **Mitigation Monitoring and Reporting Program.** When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.

10 **Notice of Determination.** An agency must file a Notice of Determination (NOD) after deciding to approve a project for which an EIR is prepared. A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA challenges.
Figure 1  Environmental Review Process

Lead Agency sends Notice of Preparation to responsible agencies

Lead Agency prepares Draft EIR

Lead Agency files Notice of Completion + gives public notice of availability of Draft EIR

Public Review period (45 days minimum)

Lead Agency prepares Final EIR, including response to comments on the Draft EIR

Lead Agency prepares findings on the feasibility of reducing significant environmental effects

Lead Agency makes a decision on the project

Lead Agency files Notice of Determination with County Clerk

Lead Agency solicits input from agencies + public on the content of the Draft EIR

Lead Agency solicits comment from agencies + public on the adequacy of the Draft EIR

Responsible Agency decision-making bodies consider the Final EIR
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2 Project Description

The proposed project is an update of the City of Alhambra General Plan, entitled Vision 2040 – A Community Mosaic, and hereafter referred to as the Plan.

The Plan is the first comprehensive update of the City’s General Plan since 1987, and establishes the community’s vision for the development of Alhambra. The Plan provides comprehensive land use, housing, circulation and infrastructure, public service, resource conservation, and public safety policies for the entire City.

This section of the EIR describes the key characteristics of the Plan, including the project proponent/lead agency, the geographic extent of the plan, project objectives, required approvals, and the types and extent of development forecast for the Plan area. This section also summarizes key aspects of the Plan that have the potential to result in physical environmental effects.

2.1 Project Proponent/Lead Agency

The City of Alhambra is both the project proponent and the lead agency for the Plan.

2.2 Project Location

Alhambra is considered the “Gateway to San Gabriel Valley” because it is situated at the western edge of the San Gabriel Valley and shares its western boundary with the city of Los Angeles and the northern terminus of the Long Beach Freeway (I-710). Alhambra is bordered by South Pasadena and San Marino to the north, San Gabriel to the east, and Monterey Park to the south. The San Bernardino Freeway (I-10) traverses Alhambra from east to west in the southern portion of the City. Figure 2 shows the local and regional location of the City.

Alhambra is a built-out community with a land area totaling 4,899 acres, or approximately 7.6 square miles. It is the second largest city in the San Gabriel Valley in terms of land area. Generally, the southern half of the City (south of Mission Road) is developed at lower densities than the northern half, with the southern half mostly composed of low- and medium-density residential development and open space and the northern half containing a mix of low-, medium-, and high-density residential uses with a variety of commercial uses.
Figure 2  Project Location
2.3 Characteristics of the Proposed General Plan Update

2.3.1 Objectives of the General Plan Update

The Plan is intended to function as a policy document to guide land use decisions in the City’s planning area through the year 2040. The vision for the City over the next 20 years was developed with extensive community input and in recognition of the state’s planning priorities. As illustrated in Figure 3 and detailed throughout the Plan, this vision includes the following:

- Stable residential neighborhoods
- Enhanced commercial corridors with a mix of office, retail, entertainment, and lodging that meets the needs of residents while attracting visitors
- Industrial and commercial districts that meet local demand, create good jobs, and take advantage of the City’s location near downtown Los Angeles
- A beautiful community with improved streetscapes, gateways, and parks

In order to achieve these objectives, the Plan focuses on improving how residents get around, meeting community needs with available services, providing a greater sense of identity, and preserving established residential neighborhoods. For most of the City, the Plan preserves the existing pattern of uses and establishes policies for protection and long-term maintenance of established neighborhoods. Generally, new development in accordance with the Plan would result in re-use of properties, conversion of properties to different uses in response to market demand (e.g., select industrial to commercial), and more intense use of land in defined areas. The Plan emphasizes bicycle connections and pedestrian-oriented focus areas, and proposes focus areas and activity nodes to help shape and distribute new development. It promotes protecting the character of existing residential neighborhoods and it outlines the future role and form of Alhambra’s public realm.

2.3.2 General Plan Organization

The Plan is organized into seven chapters, including an introduction and six topical chapters. The introduction establishes the overall vision for the future and provides context and background information on the City and the Plan itself. The six topical chapters encompass all of the elements required by California General Plan law. Each topical chapter is summarized below:

- **Land Use & Community Design.** This chapter addresses the character, design, and form of the community of Alhambra. Community character is made up of the perception and experience of the community formed by those living, working, and passing through it. It is largely determined by the built environment and the surrounding natural environment as affected by urban development. The overall vision of this chapter is to manage the use of land so growth, development, and redevelopment occur in an orderly and beneficial manner that recognizes and is sensitive to opportunities and constraints imposed by the City’s infrastructure, and environmental and social resources. Key goals include preserving the character of existing single-family neighborhoods while enhancing commercial and industrial areas to attract jobs and enhance the City’s tax base; encouraging an overall high-quality community appearance and identity; and maintaining and developing quality public spaces.
Figure 3  Vision 2040 – A Community Mosaic

**LEGEND**
- Bike Connections Into Alhambra
- Pedestrian-Oriented Focus Area
- Activity Node
- Streetscape Improvements With Varying Tree Palette
- Primary Gateway
- Secondary Gateway
- Streetscape Thinning and Improvements
- Downtown Area

**Activity Nodes**
- Improved connectivity
- Enhanced pedestrian environment
- Buildings oriented towards corners
- Streetscape beautification, plazas, and pocket parks

**Mobility**
- Pedestrian and bicycle safety improvements
- Traffic-calming measures
- Links to neighboring community bike connections into Alhambra
- Enhancement of West Main Street and portions of Valley Boulevard as pedestrian-oriented focus areas

**Design**
- Design guidelines to preserve residential neighborhood character
- Provide streetscape design direction for important corridors including: Atlantic, Fremont, Valley, Main, Garfield
  - Provide overarching theme with individual variation for each corridor
  - Establish consistent crosswalk and sidewalk treatments
- Enhance identity, create gateways:
  - Primary
    - Valley – at east and west borders
    - Main – at east and west borders
    - Atlantic – at north border
  - Secondary
    - Mission – at east and west borders
    - I-110 – at Fremont, Atlantic, Garfield

**Land Use/Economic Development**
- Capture retail, office, and hotel “leakage”
- Create nodes and distinctive streetscapes on Valley Boulevard
- Industrial Areas
  - Maintain core industrial area to the east
  - Retain industrial land use designation at Mission/Fremont/Meridian, but encourage regional commercial
  - Transition some industrial areas to allow for increased inventory and identity
  - Allow residences to serve the local workforce
- Auto Row: Allow for Auto Row growth with guidance for increased inventory and identity
- Garfield Avenue: Support medical uses for Garfield Avenue that transition out aged multi-family housing
- East Valley Boulevard: Promote hospitality and entertainment uses on Valley Boulevard near San Gabriel

East Valley Boulevard Pedestrian Node
- **Mobility.** This chapter outlines the City's program to provide mobility in the Plan area, addressing motor vehicle, bicycle, and pedestrian circulation, as well as parking issues. The overarching purpose of this chapter is to provide guidance on how to achieve a balanced transportation system that safely and efficiently moves people, goods, and services throughout the City; accommodates all modes of transportation; and maintains a pleasant and attractive environment for residents of and visitors to the City.

- **Quality of Life.** This chapter addresses housing, environmental justice, economy, jobs, culture, recreation, open space, and healthy communities. Key goals include maintaining a strong local economy; ensuring access to quality housing; providing access to recreational and cultural facilities and activities; and maintaining quality educational opportunities.

- **Resources.** This chapter addresses the City’s natural resources such as water, biological resources, soils, cultural resources, mineral deposits, energy, air quality, and related issues such as climate change/ greenhouse gases (GHG). The concept of sustainability as it relates to climate change is also addressed in this chapter. Key goals include maintaining high-quality water supplies; conserving and enhancing open space; reducing energy use to lower negative impacts on air quality and minimize Alhambra’s contribution to global climate change; and preserving Alhambra’s cultural identity as a diverse residential and commercial city with distinct single-family neighborhoods.

- **Services and Infrastructure.** This chapter addresses issues related to services (such as police, fire, schools, and libraries), as well as “hard” infrastructure (e.g., water delivery systems, stormwater systems, and wastewater and solid waste disposal systems). Current and forecast system deficiencies are identified based on information from service providers, and specific policies are included to address such deficiencies. This overarching purpose of this chapter is to maintain and enhance the infrastructure that serves Alhambra residents and businesses. Key goals include attracting development that provides benefits to the community and expands the local tax base in a fiscally responsible manner; developing a diversified, quality commercial base; and fostering area-wide recognition as a regional marketplace with uses appropriate to the Alhambra community.

- **Health and Safety.** This chapter addresses issues such as seismic hazards, hazardous materials, flooding, wildfire, noise, and community health. It contains maps identifying hazard areas and community noise sources and contours, and the maps are used in the development of specific requirements for areas subject to various hazards, as appropriate. The purposes of this chapter are to identify and outline proactive measures to minimize public safety challenges; enable the City to expediently and efficiently respond in the event of a public safety challenge; and identify and outline proactive measures to achieve a healthy community. Key goals include minimizing negative impacts to people and property from natural and man-made hazards; encouraging healthy lifestyles for Alhambra residents; and protecting Alhambra residents, businesses, and visitors from the adverse effects of climate change.

Figure 4 shows where the required General Plan elements are addressed in the Plan. Each chapter contains background information describing current conditions in Alhambra and discusses what the City needs to do to accomplish its 20-year vision. Each chapter also discusses its overall purpose, or vision, as it relates to the Plan as a whole. The goals and policies in each chapter then outline how the City plans to achieve this vision. Implementation actions designed to help achieve the goals and policies are contained in a separate document, available upon request from the City, but also included as Appendix B of this EIR.
### Mandated General Plan Elements

<table>
<thead>
<tr>
<th>General Plan Element</th>
<th>Alhambra General Plan Chapters</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>LAND USE</strong></td>
<td>LAND USE &amp; COMMUNITY DESIGN (covers Land Use)</td>
</tr>
<tr>
<td><strong>CIRCULATION</strong></td>
<td>MOBILITY (covers Circulation)</td>
</tr>
<tr>
<td><strong>OPEN SPACE</strong></td>
<td>QUALITY OF LIFE (covers Open Space and Housing)</td>
</tr>
<tr>
<td><strong>HOUSING</strong></td>
<td>RESOURCES (covers portions of Conservation)</td>
</tr>
<tr>
<td><strong>CONSERVATION</strong></td>
<td>INFRASTRUCTURE &amp; SERVICES (covers portions of Conservation)</td>
</tr>
<tr>
<td><strong>SAFETY</strong></td>
<td>HEALTH &amp; SAFETY (covers Safety and Noise)</td>
</tr>
<tr>
<td><strong>NOISE</strong></td>
<td></td>
</tr>
</tbody>
</table>

**LAND USE** designates the general distribution and intensity of uses of the land for housing, business, industry, open space, education, public buildings and grounds, waste disposal facilities, and other categories of public and private use.

**CIRCULATION** correlates with the land use element and identifies the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, and other local public utilities and facilities.

**OPEN SPACE** details programs for preserving open space for natural resource protection, the managed production of resources, outdoor recreation, and protection of public health and safety.

**HOUSING** provides a comprehensive assessment of current and projected housing needs for all economic segments of the community. It embodies policy for providing adequate housing and includes action programs.

**CONSERVATION** addresses the conservation, management, and use of natural resources, including water, soils, biological habitats, and mineral deposits.

**SAFETY** establishes policies and programs to protect the community from risk associated with seismic, geologic, flood, and fire hazards.

**NOISE** identifies and addresses noise problems in the community and forms the basis for land use distribution.
2.3.3 Overarching Purposes and Goals

Based on its objectives and input from the community, the Plan includes the overarching purposes listed in Table 3 to guide Plan policies and City decision-making. The overarching purpose is a vision statement that provides general direction for the chapter. The goals in each chapter specify ends that help achieve the overarching purpose. The goals in each chapter are also listed in Table 3. The policies are specific statements that guide decision-making. The policies for each chapter are described in Appendix B of this EIR.

2.3.4 General Plan Land Use Map

The purpose of the General Plan land use map, shown in Figure 5, is to guide the general distribution, location, and extent of the various land uses in the City. The Plan includes 14 land use designations, shown in Table 4, as well as two Specific Plan areas. Specific land use regulations for parcel development will continue to be defined in the Development Code, which will be updated following adoption of the Plan.

For the most part, land use designation descriptions are the same as those contained in the 1987 General Plan, but two new land use designations have been added: Medical Office, and Institutional. Medical Office was created for medical, professional, and administrative offices; hospitals; medical and dental clinics; laboratories; and public and quasi-public uses. Institutional was created for public and private schools, and religious facilities.

The land use map specifies land use designations for all areas of the City. Table 5 shows the proposed breakdown of land use designations under the Plan compared to the current General Plan. Note that there is little change between the current breakdown of land use designations and the proposed breakdown of land use designations, with the primary differences being the addition of the two new designations discussed above. Due to these changes, the amount of land designated Open Space has decreased 252 acres, from 444 to 192 acres. The amount of land designated Office Professional has decreased from 99 to 71 acres and 42 acres have been designated Medical Office. The 252-acre decrease in land designated Open Space is primarily a result of redesignating land occupied by schools from Open Space to Institutional. Some other land previously designated Open Space has been converted to the Public Facilities designation. These changes were made to better reflect both the current and intended uses of these properties and do not actually involve any removal of open space. Lastly, the acreage of areas covered by Specific Plans has increased 9 acres, from 141 to 150 acres, due to inclusion of Specific Plans adopted since the last General Plan Update, and right-of-way acreage has increased about 20 acres due to the removal of the Open Space designation from the railroad corridor that parallels Mission Boulevard.
Figure 5  General Plan Land Use Map
## General Plan Overarching Purpose and Goals

<table>
<thead>
<tr>
<th>General Plan Chapter</th>
<th>Overarching Purpose</th>
<th>Goals</th>
</tr>
</thead>
</table>
| **Land Use & Community Design** | Manage the use of land so growth, development, and redevelopment occur in an orderly and beneficial manner that recognizes and is sensitive to opportunities and constraints imposed by the City's infrastructure and environmental and social resources | Goal LU-1: Preservation of the character of existing single-family neighborhoods  
Goal LU-2: Enhancement of commercial and industrial areas to attract jobs and expand the City's tax base  
Goal LU-3: A high-quality overall community appearance and identity  
Goal LU-4: Focal points throughout the City that encourage diverse public places and foster economic growth  
Goal LU-5: Enhanced community identity through the provision of signs, monuments, landscaping or buildings, or a combination thereof, at City gateways  
Goal LU-6: A vital downtown Alhambra that retains the City's traditional character  
Goal LU-7: Maintenance and development of vital, attractive, and functional corridors and activity nodes  
Goal LU-8: Maintenance and development of quality public spaces |
| **Mobility** | To achieve a balanced transportation system that safely and efficiently moves people, goods, and services throughout the City; accommodates all modes of transportation; and maintains a pleasant and attractive environment for residents and visitors. | Goal M-1: A circulation system that is efficient, safe, pleasant, and attractive for all users  
Goal M-2: A circulation system that accommodates and encourages the use of alternative modes of transportation including walking, bicycling, and transit  
Goal M-3: Parking facilities that meet community needs  
Goal M-4: Street designs that accommodate all users while activating the street along key corridors |
| **Quality of Life** | Maintain and enhance Alhambra's quality of life by supporting a strong local economy, providing access to recreational and cultural facilities and activities, sustaining quality education opportunities, and ensuring access to quality housing | Goal QL-1: Attraction of commercial/industrial development with the potential to create quality jobs  
Goal QL-2: Attraction of additional retail development to enhance the shopping opportunities available to local residents and increase the City’s sales tax revenue  
Goal QL-3: Expansion of Alhambra’s market share in the San Gabriel Valley to improve the City’s position as a destination for entertainment and overnight visits  
Goal QL-4: Capitalization on Alhambra’s proximity to key regional employment centers to attract “higher order” economic development (i.e., higher-paying jobs)  
Goal QL-5: Revitalization of targeted sub-areas of the City to attract development to underutilized sites  
Goal QL-6: Provision of adequate and accessible recreation and open space amenities  
Goal QL-7: Provision and maintenance of community events and cultural activities and facilities that meet community needs and preferences  
Goal QL-8: Access to community events to benefit the entire community, including residents, businesses, visitors, and tourists  
Goal QL-9: Quality educational opportunities that maximize the use of school facilities |
<table>
<thead>
<tr>
<th>General Plan Chapter</th>
<th>Overarching Purpose</th>
<th>Goals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chapter</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal QL-10</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal QL-11</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal QL-12</td>
</tr>
<tr>
<td>Resources</td>
<td>Conserve, enhance, rehabilitate, and protect natural and cultural resources</td>
<td>Goal R-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal R-2</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal R-3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal R-4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal R-5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal R-6</td>
</tr>
<tr>
<td>Services and Infrastructure</td>
<td>Ensure that development occurs concurrent with the availability and/or funding of public facilities and services, in a timely manner, and consistent with the intent to maintain a high-quality of life in Alhambra</td>
<td>Goal SI-1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal SI-2</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal SI-3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal SI-4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal SI-5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal SI-6</td>
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<tr>
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<td>Goal SI-7</td>
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<tr>
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<td></td>
<td>Goal SI-8</td>
</tr>
<tr>
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<td></td>
<td>Goal SI-9</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal SI-10</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal SI-11</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Goal SI-12</td>
</tr>
<tr>
<td>General Plan Chapter</td>
<td>Overarching Purpose</td>
<td>Goals</td>
</tr>
<tr>
<td>----------------------</td>
<td>--------------------</td>
<td>-------</td>
</tr>
</tbody>
</table>
| Health and Safety    | Achieve and maintain an environment in the City conducive to and protective of the health and safety of its residents and visitors | **Goal HS-1** Minimization of impacts to people and property due to soil instability  
**Goal HS-2** Minimization of impacts to people and property due to seismic threats  
**Goal HS-3** Proper management of stormwater to minimize the potential effects of flooding on people and property  
**Goal HS-4** Minimization of injury, loss of life, property damage, and economic and social disruption caused by hazardous materials  
**Goal HS-5** Prevention and minimization of the adverse effects of emergencies  
**Goal HS-6** Minimization of exposure to excessive noise levels  
**Goal HS-7** Healthy lifestyles for Alhambra residents  
**Goal HS-8** Access to basic health services  
**Goal HS-9** Accessibility to affordable and nutritious foods  
**Goal HS-10** Protection of residents, business, and visitors from the adverse effects of climate change |
### Table 4  Land Use Density/Intensity

<table>
<thead>
<tr>
<th>Land Use Designation*</th>
<th>Uses Allowed</th>
<th>Maximum Height Allowed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low Density Residential</td>
<td>Single-family housing units (1-5 units per acre)</td>
<td>2 stories, 25 feet 15 feet for accessory structures</td>
</tr>
<tr>
<td>Medium Density Residential</td>
<td>Single-family detached units, duplexes, triplexes and four-plexes (6-12 units per acre)</td>
<td>2 stories, 25 feet 15 feet for accessory structures</td>
</tr>
<tr>
<td>High Density Residential</td>
<td>Multi-family housing types, including garden style units and townhouses (3-24 units per acre)</td>
<td>2 stories, 25 feet 15 feet for accessory structures</td>
</tr>
<tr>
<td>General Commercial</td>
<td>Retail and service commercial, including “boutique” hotels of 10 to 100 rooms and entertainment uses</td>
<td>5 stories, 55 feet If adjacent to a residential zone or use - 3 stories, 40 feet</td>
</tr>
<tr>
<td>Automotive Commercial</td>
<td>Car dealerships, rental facilities, repair facilities, washing facilities, service stations</td>
<td>5 stories, 55 feet If adjacent to a residential zone or use - 3 stories, 40 feet</td>
</tr>
<tr>
<td>Regional Commercial</td>
<td>Wholesale warehouses Minimum size of 5 acres</td>
<td>5 stories, 55 feet If adjacent to a residential zone or use - 3 stories, 40 feet</td>
</tr>
<tr>
<td>Central Business District</td>
<td>All commercial uses except for fortunetelling businesses, computer game and internet access centers, and office uses on the first floor of buildings with frontage on Main Street</td>
<td>10 stories, 115 feet</td>
</tr>
<tr>
<td>Medical Office</td>
<td>Medical, professional, and administrative offices, hospitals, medical and dental clinics, laboratories, public and quasi-public uses</td>
<td>5 stories, 55 feet If adjacent to a residential zone or use - 3 stories, 40 feet</td>
</tr>
<tr>
<td>Office Professional</td>
<td>Professional, financial, administrative, medical and general business office use</td>
<td>5 stories, 55 feet If adjacent to a residential zone or use - 3 stories, 40 feet</td>
</tr>
<tr>
<td>Industrial</td>
<td>Professional, medical, financial, public service, and general business offices; warehousing and distribution facilities; laboratories; lumberyards; storage facilities; plant nurseries; adult businesses; and fitness centers, health clubs, and gymnasium</td>
<td>6 stories, 75 feet</td>
</tr>
<tr>
<td>Parking</td>
<td>Public parking</td>
<td>Not applicable</td>
</tr>
<tr>
<td>Public Facilities</td>
<td>Buildings and other facilities operated and under the control of a public agency</td>
<td>5 stories, 55 feet If adjacent to a residential zone or use - 3 stories, 40 feet</td>
</tr>
<tr>
<td>Open Space</td>
<td>Public open space</td>
<td>Not applicable</td>
</tr>
<tr>
<td>Institutional</td>
<td>Public and private schools; religious facilities</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

* Densities and heights for new development can be less than what is included in this table but not more. For example, a residential project in the Medium Density Residential category may be less than six units per acre, but not more than 12 units.
### Table 5  Changes in Existing and Proposed Land Use Designations

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Existing General Plan</th>
<th>Proposed General Plan Update</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Acres</td>
<td>Percentage (%)</td>
</tr>
<tr>
<td>Low Density Residential</td>
<td>1,563</td>
<td>32</td>
</tr>
<tr>
<td>High Density Residential</td>
<td>611</td>
<td>12</td>
</tr>
<tr>
<td>Medium Density Residential</td>
<td>362</td>
<td>7</td>
</tr>
<tr>
<td>Open Space</td>
<td>444</td>
<td>9</td>
</tr>
<tr>
<td>Industrial</td>
<td>184</td>
<td>4</td>
</tr>
<tr>
<td>Institutional</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>General Commercial</td>
<td>108</td>
<td>2</td>
</tr>
<tr>
<td>Office Professional</td>
<td>99</td>
<td>2</td>
</tr>
<tr>
<td>Central Business District</td>
<td>58</td>
<td>1</td>
</tr>
<tr>
<td>Automotive Commercial</td>
<td>54</td>
<td>1</td>
</tr>
<tr>
<td>Public Facilities</td>
<td>25</td>
<td>1</td>
</tr>
<tr>
<td>Regional Commercial</td>
<td>34</td>
<td>1</td>
</tr>
<tr>
<td>Medical Office</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>Parking</td>
<td>15</td>
<td>&lt;1</td>
</tr>
<tr>
<td>Specific Plan</td>
<td>141</td>
<td>3</td>
</tr>
<tr>
<td>Rights of Way</td>
<td>1,202</td>
<td>25</td>
</tr>
<tr>
<td><strong>Total</strong>*</td>
<td><strong>4,899</strong></td>
<td><strong>100</strong></td>
</tr>
</tbody>
</table>

* Totals arrived at by adding up the individual rows above may differ slightly from the number shown here due to rounding.

### 2.3.5  Key Updates

As discussed in section 2.3.1, *Objectives of the Plan*, in order to achieve the community’s vision, the Plan focuses on improving alternative transportation, available services, and community identity, and on preserving the character of established residential neighborhoods. Consequently, the Plan preserves the existing pattern of uses in most of the City and provides for protection of established neighborhoods. The following are the key updates included in the Plan.

**Focus Areas of New Development**

The Plan proposes focus areas and activity nodes to help shape and distribute new development. Much of Alhambra is characterized by stable residential neighborhoods and established commercial uses. However, several areas, shown in Figure 3 and described below, have been identified as focus areas that offer unique characteristics and may provide opportunities to transition over time with adjustments in land use, beautification, and place-making. Generally, new development would result from re-use of properties, conversion of uses in response to market demand (e.g., select industrial to commercial), and more intense use of land in defined areas.
Main Street

Main Street has served as a social hub and center of commerce for the San Gabriel Valley since 1895. By 1950, Main Street’s upscale stores and restaurants made it one of the most popular gathering areas in the San Gabriel Valley. To ensure that this area continues to serve the community as Alhambra’s downtown, the City has facilitated numerous redevelopment projects along Main Street. In 2005, the City received the Award of Excellence from the California Redevelopment Association for its effort to transform Main Street into a walkable and livable downtown. Main Street features a variety of indoor shopping, dining, and entertainment venues. People can park their cars in any of the adjacent, free downtown parking structures and walk throughout the Main Street District. The wide right-of-way and ample median along West Main Street (from about Poplar Boulevard west to Huntington Drive) provides an opportunity for creating a more pedestrian-oriented environment with broad sidewalks, landscaping, and outdoor dining. Part of the Plan’s community vision is to enliven West Main Street without the major intensification that has occurred in the Central Business District, shown in Figure 6.

Figure 6  Conceptual Illustration of West Main Street with an Enhanced and Enlivened Pedestrian Environment

Valley Boulevard

The three-mile long Valley Boulevard corridor is a successful, culturally diverse business district that encompasses a mix of international, national, and local markets, restaurants, retail, banking, and service-type businesses. Several major Asian bank headquarters are located in Valley Boulevard’s “Financial District,” as well as businesses that cater to the City’s large Asian population. This district has the capacity to support a hotel that conforms to the character of the surrounding uses.

The Valley Boulevard corridor has the potential to support activity nodes where economic or social resources/activities will be concentrated for the benefit of the community. Nodes facilitate cost-effective economic and community development efforts by pulling together nearby people, resources, and certain land uses. The vision for Valley Boulevard includes an entertainment district at the east end of the corridor. Illustrated in Figure 7 and Figure 8, this concept includes a mix of retail, entertainment, and hospitality uses.
Garfield Medical Office Corridor

The Garfield Medical Office Corridor, located on Garfield Avenue between Main Street and the San Bernardino Freeway, is home to a growing number of medical and professional office facilities.

The vision for the Garfield Corridor is to build on this land use pattern to create a medical office corridor that meets community service needs while providing high-quality job opportunities. Increasing medical and professional office facilities may gradually phase out existing multi-family residential development along this corridor.
Mission Palm and Fremont Regional Commercial/Industrial Hubs

The Mission Palm Corridor is located in the western section of the City on Palm Avenue between Commonwealth Avenue and Mission Road. It is sometimes referred to as an “industrial corridor” because it hosts many small to medium-size companies involved in light manufacturing, distribution, or service sectors.

The Fremont corridor runs along South Fremont Avenue between Mission Road and Commonwealth Road. It is home to Fremont Plaza, the Alhambra Office Campus, Shops at the Alhambra, and Los Angeles County Department of Public Works. It offers a variety of commercial and office space. The Alhambra Campus encompasses 45 acres and includes more than 20 office buildings, six higher learning institutions, a 50,000 square foot fitness center, and service businesses designed to meet the personal needs of the immediate business community. The Shops at the Alhambra is a 17,755 square-foot retail center featuring a large open-air plaza.

The vision for this area is to maintain the core industrial area at the edge of the City, encourage regional commercial development along Fremont Street, promote media-related and high-technology industries along Palm Avenue, and transition some areas to a mix of industrial, office, and retail uses.

Alternative Transportation

The Plan emphasizes bicycle connections and pedestrian-oriented focus areas, as well as a conceptual bike network that provides bike routes that connect key areas of the City and link up with bike facilities in adjacent communities. The Mobility Element provides possible redesigns of key nodes/corridors that retrofit the street to better accommodate all users.

Preservation of Neighborhood Character

The Plan promotes protecting the character of existing residential neighborhoods and outlines the future role and form of Alhambra’s public realm. The history of Alhambra is reflected in a number of older, single-family neighborhoods, structures, businesses, and cultural facilities. The architectural character of Alhambra’s neighborhoods is highly valued by many members of the community, as they offer an aesthetic contribution to quality of life for residents, increasing property values. Craftsman-style bungalows, Spanish Colonials, Tudor-style manors, Beaux-Arts buildings, Victorian houses, and Moorish-influenced architecture all contribute to a diverse array of structures. As discussed in the Land Use and Community Design chapter of the Plan, residential neighborhoods throughout Alhambra (Figure 6 of the Land Use and Community Design chapter) reflect the architectural trends and styles current at the time of development. While new development has displaced some homes and buildings, many original structures remain.

Although the City has never developed an official inventory of historic resources in Alhambra, various private citizens and groups have performed surveys of portions of the City in the past. Some of these surveys have identified potential historic resources, but no buildings in the City have been included in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR) and, to date, the City has not adopted any specific criteria for consideration at the local level.

In 2005, the City installed signs throughout Alhambra identifying historic residential tracts, including Alhambra, Ramona Park, Midwick, Emery Park, Mayfair, Story, Marguerita–Souders, and Bean tracts. A local non-profit, the Alhambra Preservation Group, has also compiled a list of
architecturally significant properties that consists of nearly 600 homes, businesses, schools, churches, and other landmarks.

In recognition of the fact that the community highly values the City’s neighborhoods and history, the Plan includes Goal R-6 to preserve the cultural identity of Alhambra as a diverse residential and commercial city with distinct single-family neighborhoods, and Goal LU-1 to preserve the character of existing single-family neighborhoods, along with policies and implementation actions to help carry out these goals by investigating development and adoption of a historic resources preservation ordinance and developing and implementing design guidelines for distinguished or historic neighborhoods.

2.3.6 Residential and Employment Growth

Table 6 shows current and forecast population, households, and employment for the City, as estimated by SCAG. Alhambra’s population is forecast to reach approximately 88,800 in the year 2040. This represents an increase of approximately 4,800 people (six percent) from the estimated 2012 population of 84,000; an increase of approximately 2,900 people (three percent) from the estimated 2015 population of 85,900; and an increase of approximately 1,878 people (two percent) from the estimated 2017 population of 86,922.

The Plan would not accommodate growth beyond these forecasts; rather, it would redistribute some of this growth in the City through creation of the Focus Areas of New Development described in Section 2.3.5, and shown on the proposed General Plan Land Use Map (Figure 5).

<table>
<thead>
<tr>
<th>Year</th>
<th>Population</th>
<th>Households</th>
<th>Employment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012</td>
<td>84,000¹</td>
<td>29,300¹</td>
<td>28,000¹</td>
</tr>
<tr>
<td>2015</td>
<td>85,900²</td>
<td>29,600²</td>
<td>28,700²</td>
</tr>
<tr>
<td>2040</td>
<td>88,800¹</td>
<td>31,900¹</td>
<td>33,500¹</td>
</tr>
<tr>
<td>Increase, 2015–2040</td>
<td>2,900</td>
<td>2,300</td>
<td>4,800</td>
</tr>
</tbody>
</table>

¹ Source: SCAG Population, Housing, and Employment forecasts for 2040 (SCAG RTP 2016)
² 2015 data was estimated by The Natelson Dale Group, Inc. (TNDG) by interpolating between the 2012 and 2040 SCAG data (TNDG 2017, Appendix C).

According to reports produced by The Natelson Dale Group, Inc. (TNDG) in July 2015 and May 2017 (Appendix C), 85 percent of the forecast population growth is likely to be housed in multi-family units. This is in part a reflection of the fact that Alhambra is built out, with little undeveloped residential land remaining in the City. Future housing growth will therefore tend, by necessity, to occur on existing infill sites or be integrated with commercial uses. All necessary infrastructure to meet housing development pursuant to the Regional Housing Needs Assessment (RHNA) is already in place.
2.3.7 Commercial/Industrial and Employment Growth by Land Use Type

Based on forecast growth and local and regional economic factors, the May 2017 Natelson Dale report (Appendix C) forecasts how the 4,800 new jobs discussed in Section 2.3.6 may be distributed by land use type, through 2040. These forecasts are shown in Table 7. The retail/restaurant space, automobile dealership space, office space, and industrial space shown in Table 7 is expected to be accommodated within the key focus areas discussed above, including West Main Street, Valley Boulevard, Garfield Medical Corridor, and Fremont and Mission Regional Commercial/Industrial Hubs. These areas are identified and discussed in Section 2.3.5, Key Areas and within the Land Use and Community Design Chapter of the Plan. These areas will be subject to their own specific planning process, including specific plans, zoning ordinances, and CEQA review, which will guide the types and intensity of development in these areas consistent with the provisions of the Plan.

Table 7 shows the forecast distribution of new jobs associated with development facilitated by the Plan. These employment projections estimated employment growth between 2015 and 2040, based on TNDG’s land use forecasts, by commercial or industrial land use type.

The Plan is forecast to accommodate job growth of about 17.1 percent over 2012 levels and 16.7 percent over 2015 levels, bringing total employment in Alhambra to 33,500 jobs, with office employment comprising about 57 percent of new employment.

Table 7  Forecast Commercial/Industrial Development and Job Growth, 2015-2040

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Forecast New Jobs</th>
<th>Forecast New Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail/restaurant space</td>
<td>650</td>
<td>325,000 square feet</td>
</tr>
<tr>
<td>Automobile dealerships</td>
<td>84</td>
<td>4.2 acres</td>
</tr>
<tr>
<td>Office space</td>
<td>2,743</td>
<td>400,000 – 480,000 square feet</td>
</tr>
<tr>
<td>Industrial (business park) space</td>
<td>571</td>
<td>225,000 – 400,000 square feet</td>
</tr>
<tr>
<td>Hotels</td>
<td>125</td>
<td>175-250 rooms</td>
</tr>
<tr>
<td>Others a</td>
<td>626</td>
<td>N/A</td>
</tr>
<tr>
<td>Total</td>
<td>4,799</td>
<td>N/A</td>
</tr>
<tr>
<td>SCAG-forecast new jobs</td>
<td>4,800</td>
<td></td>
</tr>
</tbody>
</table>

*Includes government jobs and other jobs not tied to commercial/industrial land uses

Source: TNDG 2017

2.4 Required Discretionary Actions

With recommendations from the City’s Planning Commission, the Alhambra City Council will need to take the following discretionary actions in conjunction with the Plan:

- Certification of the Final EIR for the Plan
- Approval of the Plan

The Housing Element was adopted in 2013 and will guide the City’s housing policy up to 2021. At that time, the City will submit an updated Housing Element to the California Department of Housing
and Community Development (HCD) for review, comment, and certification. The Plan does not involve any annexation of lands or adjustments to the City’s Sphere of Influence. If annexation is pursued in the future, it would require approval from the Los Angeles Local Agency Formation Commission. The California Department of Conservation, Division of Mines and Geology, has no discretionary authority over the Plan, but will review the plans and policies relating to seismic safety for compliance with state regulations.
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3 Environmental Setting

This section describes current environmental conditions in and around Alhambra. More detailed setting information is included in the impact analysis for each issue area.

3.1 Introduction

According to Section 15125 of the state CEQA Guidelines, an EIR must include a description of the existing, physical environmental conditions in the vicinity of the project to provide the “baseline condition” against which project-related impacts are compared.

3.2 Regional Overview

Alhambra is located in central Los Angeles County, approximately seven miles northeast of downtown Los Angeles. Los Angeles County covers approximately 4,061 square miles and has more than 10.2 million residents (California Department of Finance 2017). The County is topographically diverse, with mountains, valleys, agricultural land, and distinct urban areas, all relatively close to the Pacific Ocean. The Mediterranean climate of the region and coastal influence produce moderate temperatures year round, with rainfall concentrated in the winter months. The region is subject to various natural hazards, including earthquakes, landslides, and wildfires. Together with other cities in the inland coastal plain of Los Angeles, Orange, Riverside, and San Bernardino counties, Alhambra is part of an ethnically and economically mixed region with a range of recreational, cultural, educational, and employment opportunities.

3.3 Physical Setting

3.3.1 General Geographic Setting

Geographically, Alhambra is considered the “Gateway to San Gabriel Valley” as it is situated in the western edge of the San Gabriel Valley. It shares its western boundary with the city of Los Angeles and the northern terminus of the Long Beach Freeway (I-710). The area around the City is primarily urban. Alhambra is bordered by South Pasadena and San Marino to the north, San Gabriel to the east, and Monterey Park to the south. The southern portion of the City also encompasses the San Bernardino Freeway (I-10), which traverses the city from east to west.

Alhambra has historically been and continues to be a largely residential community. As shown in Table 5, about 51 percent of the City’s land area is occupied by residential uses of varying densities. By contrast, about 16 percent of the City’s land area is occupied by business, industrial, and commercial uses. About 10 percent of the City’s land area is dedicated to open spaces, institutional facilities, and public facilities, 3 percent is covered by Specific Plans, and 25 percent is occupied by rights-of-way.
3.3.2 Topography and Drainage

Alhambra lies at the western edge of the San Gabriel Valley, an alluvial plain created by the weathering of the San Gabriel Mountains. The plain slopes generally to the southeast at about 1.5 feet for every 100 feet. The mean elevation of the City is 460 feet above sea level with a range in elevation from 380 feet in the southeastern portion of the City to 580 feet in the northwest corner. The City’s topography is relatively level in most areas, with no significant hillside areas or slopes other than hills near the City’s western and southern edges and slopes created by San Pascual Wash and Alhambra Wash in the eastern part of the City. Soils in Alhambra, as in most of the San Gabriel Valley, consist of alluvial debris deposited from the weathering of the San Gabriel Mountains, including gravely loams, sandy loams, and clays. Due to the urbanized nature of the City and the relatively level topography, soil erosion generally is not an issue.

3.3.3 Climate

The City has a subtropical and semi-arid climate. The average daytime and nighttime temperatures are 77 degrees and 52 degrees Fahrenheit, respectively, with summer highs typically in the 80s (but sometimes exceeding 100 degrees Fahrenheit) and winter lows in the 40s. Alhambra receives an average annual rainfall of about 20 inches, which falls primarily during the winter months of November through March.

3.4 Cumulative Project Setting

Because the proposed project is a general plan update, cumulative impacts are treated somewhat differently than they would be for a project-specific development. Section 15130 of the state CEQA Guidelines provides the following direction relative to cumulative impact analysis:

- Impacts should be based on a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact.

By its nature, a general plan considers cumulative impacts insofar as it considers cumulative development that could occur within a city’s plan area. Therefore, the analysis of project impacts also constitutes the cumulative analysis and this EIR does not contain a separate analysis of cumulative impacts. In addition to cumulative development within the Plan area, the analysis of traffic and related impacts (such as noise) considers the effects of regional traffic growth, based on existing and future traffic volumes from the current regional growth model, maintained by SCAG. As explained in SCAG’s 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), SCAG’s regional growth forecast is based on three major indicators: population, households, and employment (SCAG 2016). This socioeconomic input data for the transportation model are processed at the Transportation Analysis Zone (TAZ) level. TAZs, often referred to as Tier 2 analysis, are generally equivalent to census block groups. There are 11,267 TAZs in the SCAG region.
4 Environmental Impact Analysis

This section discusses the possible environmental effects of the project for the specific issue areas identified as having the potential to experience significant impacts.

“Significant effect” is defined by State CEQA Guidelines §15382 as:

a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment, but may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with an introduction summarizing the environmental effects considered for that issue area. This is followed by the setting and impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the “significance thresholds,” which are those criteria adopted by the City, other agencies, universally recognized, or developed specifically for this analysis, to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is listed separately in bold text, with the discussion of the effect and its significance following. Each bolded impact listing also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the significance threshold level with implementation of reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the state CEQA Guidelines.
- **Less than Significant with Mitigation.** An impact that can be reduced to below the significance threshold level with implementation of reasonably available and feasible mitigation measures. Such an impact requires findings to be made under §15091 of the State CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse, but does not exceed the significance threshold levels and does not require mitigation measures. Mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact or Beneficial.** No impact would occur or the Plan would have a beneficial effect.

Following each environmental effect discussion, a list is provided of recommended mitigation measures (if required) and the residual effects or level of significance remaining after the implementation of the measures. In those cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed as a residual effect. The impact analysis concludes with a discussion of cumulative effects that evaluates the impacts associated with the project in conjunction with other future development in the area near Alhambra. Please refer to Table 1 in the Executive Summary of this EIR for a summary of all impacts and mitigation measures that apply to the project.
As outlined in Section 3.4, Cumulative Project Setting, Section 15130 of the state CEQA Guidelines provides the following direction relative to cumulative impact analysis:

Impacts should be based on a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact.

By its nature, a general plan considers cumulative impacts insofar as it considers cumulative development that could occur within a city’s plan area. Therefore, the analysis of project impacts also constitutes the cumulative analysis and this EIR does not contain a separate analysis of cumulative impacts. In addition to cumulative development in the Plan area, the analysis of traffic and related impacts (such as noise) considers the effects of regional traffic growth.
4.1 Aesthetics

This section describes current visual conditions in and around Alhambra and evaluates the potential aesthetic and visual impacts of the Plan. Information for this section was taken in part from the 2015 City of Alhambra Community Profile (Alhambra 2015) and other recent documents prepared for the City.

4.1.1 Environmental Setting

Visual resources are an important component of the quality of life of any community. As residents, workers, and/or visitors experience a place, their primary sensory interaction with that place is visual, and a wide variety of visual elements form the aesthetic character. These elements include scenic vistas, scenic resources, light and glare, and the visual character and quality of the area’s topography, natural features, and urban form.

a. Scenic Resources

Scenic Streets

While the City has no designated scenic streets, city streets can and sometimes do enhance the aesthetic environment of the community, if they are well-designed. They can also serve an open space function by providing walking, jogging, bicycling, and relaxation opportunities, when they are configured with adequate sidewalks, bike paths, street trees, landscaped planting areas, and other streetscape amenities. This is further extended if they connect to other amenities with potential scenic value, such as parks and open space.

Scenic Highways

California’s Scenic Highway Program was created in 1963. Its purpose is to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. Scenic corridors typically pertain to highways and visible lands outside the highway right-of-way, generally described as the view from the road. While there are no officially designated scenic highways in Alhambra, the Foothill Freeway (Interstate 210 [I-210]), located approximately 2.5 miles north of the northern edge of the City, is identified as eligible for state scenic highway designation (Caltrans 2011).

Scenic Vistas

A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Scenic vistas encompass long-range views and often emphasize large-scale natural features. The following is a discussion of potential scenic vistas in Alhambra.

While Alhambra’s topography is generally flat, it is framed by hills near the western and southern edges of the City, with slopes created by San Pascual Wash and Alhambra Wash in the eastern part of Alhambra and shown in Figure 22 in Section 4.4.1(b), Regional Geologic Setting. The dominant views from the City are of these surrounding slopes and the more distant San Gabriel Mountains, which can be seen from much of the City, looking north. On a clear winter day, the mountains are often snow-capped and clearly visible.
Figure 9 shows a view of the San Gabriel Mountains looking north from South Atlantic Boulevard. Figure 10 shows the view of the hills near the western and southern edges of the City from the corner of Meridian Avenue and Poplar Boulevard, facing northwest, and the intersection of Warwick Road and Winthrop Drive, facing south, respectively. Figure 11 shows the channelized San Pascual Wash and Alhambra Wash. The Alhambra Wash runs along the northeastern border of the City, through Almansor Park, exiting the City at its southern end. It is channelized along its entire length through the City, with urban development up to its edge, except through Almansor Park, which has minimized natural variations in topography, views of this wash, and scenic qualities it may have had when it existed in a more natural state. The San Pascual Wash is also channelized, with only minimal variations in topography approximating a more natural state in the area of Story Park (Figure 11), with a similarly low level of visibility and scenic qualities.

Although the San Gabriel Mountains, hills along the western and southern edges of the City, and slopes created by the San Pascual Wash and Alhambra Wash in the eastern part of the City provide a variance in topography, these areas are not identified by the City as part of a scenic vista. Because views of the San Gabriel Mountains are prominent and the public can see the mountains from much of the City, views of the San Gabriel Mountains could be considered part of a scenic vista.

b. Urban Visual Character and Quality

While scenic vistas encompass long-range views and often emphasize large-scale natural features, views are also affected by their more immediate visual surroundings. Local aesthetics, typically on a neighborhood level, also contribute to the City’s urban visual character. Development densities and types, distinctive neighborhoods and commercial districts, unique architectural elements, prominent public institutions/landmarks, and other elements all contribute to the City’s aesthetic quality.

Development Patterns

Alhambra is a built-out community in an urbanized area, but it still retains the predominantly single-family residential character valued by many members of the community. It is also characterized by distinct, diverse commercial areas and a variety of active and passive recreational facilities.

Residential Character

Alhambra’s residential character features multiple architectural styles, including Craftsman-style bungalows, Spanish Colonials, Tudor-style manors, Beaux-Arts buildings, Victorian houses, and Moorish-influenced architecture. Many are considered of historical significance. Figure 12 shows examples of several residential architectural styles in the City. Photograph 1 shows an example of a Victorian-style home, while Photograph 2 shows the Spanish style. Photograph 3 shows a Craftsman-style home. In addition to the single-family residences, multi-family residences form unique architectural styles in the City, as shown in Photograph 4.
Figure 9  View of the San Gabriel Mountains in the City of Alhambra

View from South Atlantic Boulevard looking north, with the San Gabriel Mountains in the background
Figure 10 Example Views of the Hillsides in the City

Photograph 1. View of western hillsides

Photograph 2. View of southern hillsides
Figure 11 Example Views of the San Pascual Wash and Alhambra Wash in the City

Photograph 1. View of channelized San Pascual Wash

Photograph 2. View of channelized Alhambra Wash
Figure 12 Residential Architectural Styles in Alhambra

Photograph 1. Victorian-style residence

Photograph 2. Spanish-style residence

Photograph 3. Craftsman-style home

Photograph 4. Multi-Family homes
Commercial Areas

Alhambra provides culturally diverse businesses and a wide range of restaurants for the community. The City has several corridors and specific areas that have identifiable styles, such as downtown Main Street, West Main Street, the Valley Boulevard corridor, the Garfield medical office corridor, and the Mission Palm and Fremont corridors. Each is described in more detail below.

**Downtown Main Street**

Main Street between Atlantic Boulevard and about Almansor Street serves as the spine of Alhambra’s downtown. It is a four lane street that provides a variety of indoor shopping, dining, and entertainment venues. Businesses are lighted with prominent neon signage. Figure 13 shows the Diner on Main (Photograph 1) and the 38° Ale House & Grill (Photograph 2). 38° Ale House & Grill has a more modern style of architecture while the Diner on Main is reminiscent of a 1950s-style diner. The height of buildings varies from one to five stories, with pedestrian walkways and trees lining both sides of Main Street. Several downtown businesses provide outdoor seating adjacent to the sidewalks, and several art galleries are visible from Main Street. Downtown Main Street also includes recent residential mixed-uses and streetscape landscaping (Figure 13, Photograph 3).

**West Main Street**

West Main Street (from about Poplar Boulevard to Huntington Drive) has a much different aesthetic character than downtown Main Street. It features a mix of commercial and residential uses that are generally one to three stories in height, considerably lower than most development on downtown Main Street. The roadway right of way is also much larger in this area than in downtown Main Street, with a wide right-of-way and an ample, landscaped median along West Main Street between Raymond Avenue and Huntington Drive providing opportunities for a pedestrian-oriented area with broad sidewalks, landscaping, and outdoor dining. An example of West Main Street’s residential and commercial uses, with wide, landscaped medians is provided in Figure 14. Part of the Plan’s vision is to enliven West Main Street without the major intensification that has occurred in the Central Business District.

**Valley Boulevard Corridor**

The three-mile long Valley Boulevard Corridor is a successful, culturally diverse business district that encompasses a mix of international, national, and local markets, restaurants, retail, banking, and service-type businesses. Several major Asian bank headquarters are located in Valley Boulevard’s “Financial District,” along with businesses that cater to the City’s large Asian population. Figure 15 shows an example of an Asian market (Photograph 1) and an example of the common “strip mall”-style of development for commercial uses (Photograph 2). Sidewalks have sporadic shrubs and trees along the boulevard, with pedestrian walking space on either side. Additionally, a landscaped median with trees and shrubs is situated between the eastbound and westbound lanes. Buildings vary between one and two stories, but are generally single-story structures with prominent signs advertising the service-type businesses along the boulevard. Figure 15 also shows an example of the landscaped median and the streetscape along Valley Boulevard (Photograph 3).
Figure 13 Visual Character of Downtown Main Street

**Photograph 1.** Diner on Main Restaurant

**Photograph 2.** The 38° Ale House & Grill Restaurant

**Photograph 3.** Example of mixed-use residential in downtown Main Street
Figure 14 Visual Character of West Main Street

View of the residential and commercial uses along West Main Street with ample street right-of-way and landscaped medians
Figure 15 Visual Character of Valley Boulevard Commercial Uses

Photograph 1. Valley Supermarket

Photograph 2. Valley Square “strip mall”

Photograph 3. Valley Boulevard example streetscape with landscaped medians
**Garfield Medical Office Corridor**

The Garfield Medical Office Corridor, located on Garfield Avenue between Main Street and the San Bernardino Freeway, is home to a growing number of medical and professional office facilities. This corridor includes one- to two-story buildings with architecture resembling that of single-family homes, large modern buildings with large glass panes and smooth facades, or buildings in the strip mall-style described in the Valley Boulevard Corridor, with trees occasionally lining both sides of the sidewalk where the street width allows. The sidewalks along this four-lane avenue are relatively narrow and do not provide ample pedestrian-friendly access. An example of the medical offices and streetscape of the area is shown in Figure 16.

**Figure 16 Visual Character of Garfield Medical Office Corridor**

Medical offices and streetscape example of the Garfield Medical Office Corridor

**Mission Palm “Industrial” Corridor and Fremont Corridor**

The Mission Palm Corridor is located in the western section of the City on Palm Avenue between Commonwealth Avenue and Mission Road. It is sometimes referred to as an “industrial corridor” as it hosts many small-to-medium-sized companies involved in the light manufacturing, distribution, or service sectors. Palm Avenue in this area is two wide lanes with angled street parking and a center turn lane. Buildings are generally one-story tall with beige and white facades. The sidewalks lack ample pedestrian space and the streetscape lacks consistent vegetation.

The Fremont Corridor runs along South Fremont Avenue between Mission Road and Commonwealth Road. Fremont Avenue in this area is generally four lanes with a median planted
with shrubs and trees, in addition to shrubs and trees adjacent to the sidewalk. There is some pedestrian-friendly space, but it is limited by streetlights and trees in the sidewalk. The Fremont Corridor is home to Fremont Plaza, the Alhambra Office Campus, Shops at the Alhambra, and Los Angeles County Department of Public Works. Figure 17 shows an example of the streetscape of Fremont Avenue (Photograph 1) and an example of the streetscape of the Mission Palm Industrial Corridor (Photograph 2).

**Rail Line**

Along the southern boundary of Mission Road, an existing railway trench is currently open except for periodic roadway overcrossings. This railway trench area is not usable by the public at this time, and generally consists of unadorned hard surfaces including steel, gravel, and concrete, although some aesthetic improvements have been made. These include added planters at overcrossings, vines along fences and walls, and murals such as the one on Mission Road at the eastern end of the City near Almansor Park (Figure 18).

**Open Space and Recreational Facilities**

Open space provides visual relief from urbanized areas, including views for motorists, bicyclists, and pedestrians. Because the majority of Alhambra is currently developed, open space is provided in the form of parks, a golf course, and street medians interspersed throughout the City. Figure 19 shows the pool at Alhambra Park (Photograph 1), examples of Almansor Park including a basketball court (Photograph 2) and a lake (Photograph 3), and Alhambra Golf Course (Photograph 4). Details about the parks and other recreational facilities in the City are described below.

**PARKS**

Currently, the City maintains six parks totaling more than 200 acres. Alhambra Park, Almansor Park, Granada Park, and Story Park have sports fields and courts for activities like baseball, basketball, soccer, or tennis utilized by youth teams and adult sports leagues throughout the year. These parks include playground equipment, exercise courses, activity rooms, and gymnasiums. Some of Alhambra’s parks and plazas are designed especially for passive recreation. Burke Heritage Park features a xeriscaped garden featuring drought-tolerant plants that minimize the need for irrigation, and a Historical Museum. Gateway Plaza Park includes benches and a garden, and is home to a 26-foot tall, public artwork in the shape of an arch. The two-acre Winston Smoyer Memorial Community Garden on Mission Road has approximately 100-foot plots for rent to community members for a few dollars per month. Many of the City’s other parks include large, open grass areas for relaxing and people-watching. Story Park is home to the Joslyn Adult Recreation Center, which offers a variety of exercise, diet, and lifestyle classes for seniors. It also has outdoor tennis courts open to the public.

**ALHAMBRA GOLF COURSE**

The Alhambra Golf Course is a municipal facility with a regulation, par 71 course open to the public. The turf is irrigated with non-potable water, and the course’s environmentally-friendly design has earned it recognition from Audubon International. The facility also includes a night-lighted golf practice center with two chipping greens, a putting green, and the country’s first three-level practice range lit for nighttime use.
Figure 17 Visual Character of Mission Palm and Fremont Corridors

Photograph 1. Streetscape example of the Fremont Corridor

Photograph 2: Streetscape example of the Mission Palm Industrial Corridor
Figure 18 Rail Line Trench

Photograph 1. Rail line trench with rail cars

Photograph 2. Rail line trench without rail cars

Photograph 3. Alhambra mural near the intersection of Mission Road and South Almansor Street, along northern boundary of rail trench
Figure 19 Examples of Alhambra’s Parks and Open Space

Photograph 1. Alhambra Park Pool
Photograph 2. Almansor Park Basketball Court
Photograph 3. Almansor Park Lake
Photograph 4. Alhambra Golf Course
ANGELES NATIONAL FOREST

The Angeles National Forest is 10 miles north of Alhambra. It encompasses 650,000 acres including mountains, rivers, dense forests, and wilderness and offers a variety of regional recreational activities all-year round, including hiking, camping, swimming, fishing, mountain biking, and horseback riding.

Light and Glare

Alhambra is primarily built out. Therefore, a substantial amount of nighttime ambient light from urban uses already exists. Typical contributors to nighttime ambient light levels include both stationary and mobile sources. Stationary sources include exterior structure illumination, light spillover from interior lighting, lighting for outdoor uses such as sports fields and courts, parking lot lighting, streetlights, and illuminated signage such as neon signs. In an urban setting such as that in Alhambra, the principal mobile contributor to nighttime light is vehicle headlights. While exterior lighting is important for safety and wayfinding in an urban setting, excessively high, ambient nighttime light levels can have various negative effects, including reduction of night sky visibility, and annoyance or interference with sleep when the light intrudes into interior spaces.

Glare is a separate but related phenomenon, and can be defined as excessive and uncontrolled brightness from a particular source, with the viewer being exposed to a direct or reflected view of the light source (Rensselaer Polytechnic University 2007). During the day, the primary source of glare is sunlight reflected by highly reflective surfaces such as glass and metal on buildings and cars, while nighttime light and glare comes from the same sources of nighttime ambient light, discussed above.

4.1.2 Regulatory Framework

a. City of Alhambra Municipal Code

Title 23 of the Alhambra Municipal Code, Zoning, includes the City’s zoning regulations and standards. The purpose of Title 23 is to designate, regulate, and control the location, use, height, and alterations of buildings, structures, and land for residence, commerce, trade and industry, or other purposes. The City is divided into various zones, with standards for each zone regulating these qualities. Such regulations are deemed necessary to encourage the most appropriate use of land and preserve the aesthetic qualities of the City. Examples include requiring development to provide adequate open spaces for light and air, limiting the density of development, and implementing landscaping standards. Additional regulations affecting the aesthetic character of Alhambra are contained in Municipal Code Chapter 17.50, Hazardous Waste Facilities, which describes the prohibition of these facilities in areas of recreational, cultural, or aesthetic value.

The City has also adopted a sign ordinance to control the size and location of signs in Alhambra. Design is an important element in the selection and preservation of historic structures located throughout the City, as well as a main consideration in the rehabilitation of the downtown central business district.

The City has adopted 10 specific plans with established zones that help govern development in various parts of Alhambra where zoning regulations and standards may differ from the general ones. The specific plans range from one development (e.g., a specific site) to a planned development area (e.g., the Valley Boulevard Corridor Specific Plan Zone). The specific plans of the City include the following:
4.1.3 Impact Analysis

**Methodology and Significance Thresholds**

The assessment of aesthetic impacts involves qualitative analysis inherently subjective in nature. Viewers react to views and aesthetic conditions differently. This evaluation measures the existing visual environment of the Plan area, described above, against the proposed action (implementation of the Plan), analyzing the nature of the anticipated change. It is important to underscore that the project is a General Plan, and does not contain specific development proposals. This analysis focuses therefore on land use changes envisioned under the Plan and the aesthetic impacts on the community in terms of arrangement of built to open space, density and intensity of development, and height according to the thresholds of significance discussed below. The existing visual character and context of the Plan area is shown and described in Section 4.1.1, *Environmental Setting*, of this EIR.

**Significance Thresholds**

The following thresholds of significance are based on Appendix G of the *CEQA Guidelines*. For purposes of this EIR, implementation of the Plan may have a significant adverse impact if it would:

1. Have a substantial adverse effect on a scenic vista
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway
3. Substantially degrade the existing visual character or quality of the site and its surroundings
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area
Project and Cumulative Impacts

**Threshold 1:** Have a substantial adverse effect on a scenic vista

**Impact AES-1:** IMPLEMENTATION OF THE PLAN WOULD RESULT IN NEW LAND USES THAT MAY AFFECT PLAN AREA SCENIC VISTAS, BUT THE PLAN CONTAINS POLICIES SPECIFICALLY DESIGNED TO PROTECT SCENIC VISTAS. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Due to the topography of the City, which consists of a central, relatively flat valley framed by hillsides on the south and west, and washes on the east, there are many long-range mountain views throughout the City. As discussed under Section 4.1.1, Environmental Setting, scenic views in the City are limited to background views of the San Gabriel Mountains to the north.

Alhambra is almost completely developed. For most of the City, the Plan would preserve the existing pattern of uses and implement policies for protection and long-term maintenance of established neighborhoods. Generally, new development in accordance with the Plan would result in re-use of properties, conversion of properties to different uses in response to market demand (e.g., select industrial to commercial), and somewhat more intense use of land in defined areas. The Plan sets forth policies for protection and long-term maintenance of established neighborhoods along with focused areas of change around scenic streets, identified in Section 4.1.1, Environmental Setting. Overall, the Plan emphasizes redefined commercial and industrial corridors, proposes focus areas to help shape and distribute new development, promotes protection of the character of existing residential neighborhoods, and outlines the future role and form of Alhambra’s public realm.

Given the City’s surrounding hillside and mountain views (described in the Scenic Vistas subsection above), new development allowed under the Plan has the potential to affect views from the City of scenic vistas. Specifically, new and more intensely developed urban uses along Valley Boulevard, Main Street, Fremont Avenue, and Garfield Avenue could partially obstruct views of scenic vistas from various locations in the City. Figure 3 of this EIR shows areas with the greatest potential for change under the Plan.

In addition to the urban development of structures along prominent roadways in Alhambra, the City has taken steps to improve the aesthetic quality of its streets and other public spaces. For example, the City has a parkway tree planting plan for the entire City, and has established a street tree planting program along portions of Main Street and Mission Road. The City has also adopted a sign ordinance designed to control the size and location of signs.

Implementation of the policies from the Plan, listed below, would protect and enhance the views, including scenic vistas from the City.

- **Policy LU-1D** Encourage land use patterns that minimize incompatibility between uses
- **Policy LU-8C** Enhance the open space network around corridors and activity nodes by providing paseos, courtyards, plazas, larger parkways, and landscaped setbacks

Because development of new and intensified urban uses would be regulated by the Plan policies and because views of scenic vistas would only change incrementally as the area is already developed and in an urban environment, impacts to scenic vistas would be less than significant. In addition, future developments in the City would undergo further environmental and design review on a project-by-project basis, as they are proposed, to identify and address any project-specific impacts to scenic vistas.
Mitigation Measures

None required beyond compliance with applicable Plan policies.

<table>
<thead>
<tr>
<th>Threshold 2:</th>
<th>Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway</th>
</tr>
</thead>
</table>

**Impact AES-2:** IMPLEMENTATION OF THE PLAN WOULD RESULT IN NEW LAND USES THAT MAY AFFECT SCENIC RESOURCES IN THE CITY. HOWEVER, THE PLAN CONTAINS POLICIES SPECIFICALLY DESIGNED TO PROTECT SCENIC RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.1.1, Environmental Setting, there are no officially designated state scenic highways in Alhambra. The Foothill Freeway is located approximately 2.5 miles north of the northern edge of Alhambra in the City of Pasadena, and is the nearest state highway eligible for a scenic highway designation (Caltrans 2011). A state scenic highway changes from “eligible” to “officially designated” when the local jurisdiction adopts a scenic corridor protection program, applies to Caltrans for scenic highway approval, and receives notification from Caltrans that the highway has been designated as a Scenic Highway. The local jurisdiction must also adopt ordinances to preserve the scenic quality of the corridor or document that such regulation already exists in local codes. Because the eligible portion of the I-210 is located 2.5 miles north of Alhambra in Pasadena and existing development interrupts views of Alhambra from the highway, implementation of the Plan would not affect scenic resources in a state scenic highway viewshed. Impacts would be less than significant.

Mitigation Measures

None required.

<table>
<thead>
<tr>
<th>Threshold 3:</th>
<th>Substantially degrade the existing visual character or quality of the site and its surroundings</th>
</tr>
</thead>
</table>

**Impact AES-3:** WHILE DEVELOPMENT UNDER THE PLAN COULD CHANGE THE VISUAL CHARACTER AND QUALITY OF PORTIONS OF THE CITY, THE PLAN CONTAINS GOALS AND POLICIES SPECIFICALLY DESIGNED TO PROTECT AREAS OF HIGH VISUAL CHARACTER AND QUALITY AND IMPROVE AREAS OF LOW VISUAL CHARACTER AND QUALITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The land use changes envisioned under the Plan may affect the aesthetic character of various areas in Alhambra and the entire City. While all land uses would be required to adhere to the design, density, and height guidelines applicable to particular land use designations, the Plan would also establish goals and policies that would help define and guide the desired visual character and quality of specific districts, activity centers, and corridors in the community, described in Section 2, Project Description, of this EIR. The vision established by the Plan places a greater emphasis on building form and character in districts and neighborhoods to allow a mix of land uses. It emphasizes improved gateways, and improved (and in some cases redefined) corridors. As discussed below, the Plan defines (both physically and visually) the desired visual character and quality of these areas, and sets forth urban form policies to ensure that the City retains the unique aesthetic qualities valued by its residents. The Plan does not call for substantial changes to established residential neighborhoods and includes specific policies aimed at retaining the character of the neighborhoods and preserving historic resources.
The Plan would foster development of the community with improved streetscapes, gateways, and parks while improving opportunities for walking and biking to a variety of destinations. Development would also occur in other key “focus areas” around Alhambra. These have been identified as areas that offer unique characteristics, and may provide opportunities to transition over time with adjustments in land use, beautification, and place-making. These areas, described in Section 4.1.1d, include West Main Street, the Valley Boulevard corridor, the Garfield medical office corridor, and the Fremont and Mission regional commercial/industrial hubs.

On West Main Street, the Plan identifies the opportunity to create a more pedestrian-oriented environment with broad sidewalks, landscaping, and outdoor dining by using the wide right-of-way and ample median along this street. Figure 20 provides an example of the streetscape concept for West Main Street. As a part of the community Vision Plan, this area is planned to be enhanced further without intensification, while retaining its traditional character.

The visual character of the Valley Boulevard corridor, Garfield Medical Office corridor, and Fremont corridor would be improved with streetscape themes and varying tree palettes, providing an overarching design theme and consistent crosswalk and sidewalk treatments, as shown in Figure 21. In addition, gateways to and from the City would be improved at the eastern and western boundaries of the City with a unified signage program.

**Figure 20 Streetscape Example for West Main Street**
In addition to enhancing existing streetscapes and other public spaces, the City also promotes mixed-use development through Policy 3.3 of the City’s Housing Element, which calls for the City to “Promote mixed-use development where housing is located adjacent to jobs, shopping, services, schools, transportation corridors, and leisure opportunities.” Mixed-use development already exists in some areas of the City, particularly where specific plans have been approved, such as the Alhambra Place Specific Plan, located at the juncture of Garfield Avenue and Main Street; the Alhambra 5th and Main Specific Plan; the Casita de Zen Specific Plan; the 2300 Poplar Specific Plan; and the Alhambra Pacific Plaza Specific Plan. Mixed-use developments integrate housing and commercial or office uses in proximity to one another, and tend to unify fragmented areas. Mixed-use developments may also include community facilities such as parks and schools, higher-density
residential development, or small-scale community-oriented retail uses. While mixed-use developments could represent a change to the types of uses allowed in certain areas, they tend not to negatively affect the visual character and quality of the area for several reasons. First, such development would frequently re-use existing buildings rather than create new ones, thus resulting to little visual change. Second, even when mixed-use developments replaced existing development, the goals and policies contained in the Plan would protect the visual character and quality of their surroundings, including streetscapes and neighborhoods citywide. The goals and policies in the Plan related to visual character and quality include:

**Policy LU-1D**  Encourage land use patterns that minimize incompatibility between uses

**Policy LU-2A**  Promote the use of high-quality design, materials, landscaping, and pedestrian connections

**Policy LU-2C**  Design parking and loading areas as an integral part of the total project design. Locate parking and loading areas so that the visual impacts of these areas on adjacent development and the public right-of-way are minimized, and screen them attractively using a combination of fencing and landscaping

**Goal LU-3**  A high quality overall community appearance and identity

**Policy LU-3A**  Foster new development that is consistent with the established land use type, intensity, character, and scale of the area

**Policy LU-3C**  Beautify entry points to the City and develop attractive, parks, signs, and landscaped rights-of-way clearly visible to motorists that will distinguish Alhambra from surrounding cities

**Policy LU-3D**  Incorporate streetscape design improvements for important corridors, such as Atlantic, Fremont, Valley, Main, and Garfield

**Policy LU-4A**  Design focal points and architectural features in the development or rehabilitation of existing neighborhoods

**Policy LU-4B**  Establish siting and design criteria for public buildings and parks to enhance spatial definition, create focal points, and provide landscaping and trees

**Goal LU-5**  Enhanced community identity through the provision of signs, monuments, landscaping, or buildings, or a combination thereof, at City gateways

**Policy LU-5A**  Implement a unified sign program to help orient visitors throughout the community including directional signs, information and historical interpretive signs, and freeway and transit identification signage

**Policy LU-5B**  Incorporate unified design materials that provide a consistent, branded identity and include an icon or logo that represents the City

**Policy LU-6B**  Enhance streetscapes and building elements to promote pedestrian activity by providing well-articulated building facades with quality materials and workmanship, and featuring high-quality street furnishings and design

**Policy LU-6D**  Improve the frontage zone as extensions of buildings by enhancing entryways and doors, incorporating sidewalk cafes, and enhancing the space adjacent to the building as part of the pedestrian experience

**Goal LU-8**  Maintenance and development of quality public spaces
Policy LU-8A  Continue to implement the parkway tree planting plan to promote pedestrian activity by establishing well-designed streetscapes, active ground floor uses, and tree-canopied sidewalks that are unique to the neighborhood.

All new development would be required to conform to Plan standards. New developments would also be subject to existing building and development standards specified in the City’s Municipal Code. Thus, while the visual character of portions of the City would change as new development occurs, compliance with established standards would provide development opportunities that complement and enhance the City’s existing visual character and quality. Therefore, the Plan would have a less than significant impact on the visual character and quality of the City.

Mitigation Measures

None required beyond compliance with applicable Plan policies.

| Threshold 4: | Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area |

Impact AES-4:  NEW DEVELOPMENT UNDER THE PLAN COULD INCREASE LIGHT AND GLARE EFFECTS ON SENSITIVE RECEPTORS, SUCH AS RESIDENTIAL USES, IN CERTAIN AREAS OF THE CITY BY INTENSIFYING DEVELOPMENT IN CERTAIN FOCUS AREAS NOT IDENTIFIED PREVIOUSLY AS SUCH UNDER THE EXISTING GENERAL PLAN. HOWEVER, THESE FOCUS AREAS ARE ALREADY DEVELOPED WITH AND DESIGNATED FOR URBAN USES, AND NEW DEVELOPMENT IN THESE AREAS WOULD BE SUBJECT TO PLAN POLICIES AND THE CITY’S EXISTING REGULATIONS GOVERNING LIGHT AND GLARE. THEREFORE, THE PLAN WOULD NOT IN ITSELF SUBSTANTIALLY INCREASE LIGHT AND GLARE BEYOND LEVELS ALREADY ALLOWED UNDER THE CURRENT GENERAL PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As shown in Figure 3, Vision Plan, development changes in identified nodes and corridors of the City (as described in Section 4.1.1b, Development Patterns, of this EIR) include enhanced pedestrian and bicycle improvements, streetscape enhancements, and the transition of industrial areas to allow for a mix of commercial uses (such as office and retail). These planned development areas could create new sources of light from exterior building illumination, outdoor lighting associated with pedestrian and bicycle facilities, and glare from reflective building surfaces and vehicle surfaces or the headlights of vehicular traffic. As a result, these new sources of light or glare could affect adjacent light-sensitive land uses.

Alhambra is built out and a substantial amount of ambient light from urban uses already exists. Implementation of the Plan would primarily result in revitalization and enhancements that would include intensification and reuse of existing sites. Thus, the Plan would not in itself significantly increase light and glare beyond levels already allowed under the current General Plan.

Existing Municipal Code design standards, listed in Section 23.44.030, General Design Standards, state that development must have stationary lighting located along vehicular access ways, major walkways, and all covered and enclosed parking areas. The light must be deflected away from adjacent properties. In addition, all development is reviewed by the Design Review Board for consistency with the City’s standards.

The following Plan policy would help reduce potential impacts relates to light and glare:

**Policy LU-8B**  Ensure that signs, lighting, and other potential nuisances are sensitive to existing residential neighbors.
For all the reasons discussed above, light and glare effects would be less than significant.

**Mitigation Measures**

None required beyond compliance with applicable Plan policies.
4.2 Air Quality

This section describes existing air quality conditions in Alhambra and the Plan’s potential impacts on air quality. Information for this section is based in part on data from the South Coast Air Quality Management District (SCAQMD) and the California Air Resources Board (CARB). Greenhouse gases (GHG) and global climate change are discussed in Section 4.5, *Greenhouse Gas Emissions*.

4.2.1 Environmental Setting

**a. Climate**

Alhambra is located in the South Coast Air Basin (Basin), so named because its geographical formation creates a basin where the surrounding mountains trap the air and its pollutants. The basin includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside counties. The regional climate in the Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity.

Alhambra is located in the eastern Los Angeles County portion of the Basin. The annual average low temperature in the City is 43 degrees Fahrenheit, with the annual average high temperature being 76 degrees Fahrenheit. Typically the area experiences a daily wind pattern of daytime onshore sea breezes and nighttime land breezes. This pattern is broken only by occasional winter storms and infrequent Santa Ana winds from the mountains and deserts north and east of the Basin. Usually warm, dry, and dusty, Santa Ana winds are particularly strong in passes and at the mouths of canyons. Sustained winds of 60 miles per hour with higher gusts are common for these conditions. On average, Santa Ana wind conditions occur five to 10 times per year, with each event lasting up to a few days.

**b. Air Pollutants**

Air pollutant emissions in the Basin are generated by stationary, mobile, and natural sources. The characteristics of these sources are discussed below.

Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Construction activities such as excavation and grading also contribute to point source emissions. Typical examples are boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and produce many small emissions. Typical examples of area sources include residential and commercial water heaters, painting operations, portable generators, lawn mowers, agricultural fields, landfills, and consumer products such as barbeque lighter fluid and hair spray.

Mobile sources refer to emissions from on- and off-road motor vehicles that generate tailpipe and evaporative emissions. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, trains, and construction vehicles. Mobile sources account for the majority of the air pollutant emissions in the Basin.

Natural sources refer to emissions generated by the natural environment. An example of this is when fine dust particles are pulled off the ground and suspended in the air during periods of high
winds. Another natural source is wildfires, which can produce large emissions of particulate matter and other pollutants from the combustion of vegetation.

The definitions of the six primary criteria pollutants, including ozone ($O_3$), carbon monoxide (CO), nitrogen dioxide ($NO_2$), sulfur dioxide ($SO_2$), particulates less than 10 and 2.5 microns in diameter ($PM_{10}$ and $PM_{2.5}$), and lead (Pb) are provided below.

- **Ozone.** Ozone is produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides ($NO_x$) and reactive organic gases (ROG). $NO_x$ forms during the combustion of fuels, while ROGs form during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in substantial concentrations between the months of April and October. Ozone is a pungent, colorless toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, persons with respiratory disorders, and people who exercise strenuously outdoors.

- **Carbon Monoxide.** CO is a local pollutant that is found in high concentrations only near a source of carbon monoxide. The major source of CO, a colorless, odorless, poisonous gas, is automobile traffic. Elevated concentrations, therefore, are usually only found near areas with high traffic volumes. Health effects from CO are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulty in people with chronic diseases, reduced lung capacity and impaired mental abilities.

- **Nitrogen Dioxide.** NO$_2$ is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO$_2$ creating the mixture of NO and NO$_2$ commonly called NO$_x$. Nitrogen dioxide is an acute irritant. A relationship between NO$_2$ and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. NO$_2$ absorbs blue light and causes a reddish brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of $PM_{10}$ and acid rain.

- **Suspended Particulates.** Atmospheric particulate matter is composed of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. The particulates of particular concern include $PM_{10}$ (measures no more than 10 microns in diameter) and $PM_{2.5}$ (a fine particle measuring no more than 2.5 microns in diameter). The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and $PM_{2.5}$ can be different. Major man-made sources of $PM_{10}$ are agricultural operations, industrial processes, combustion of fossil fuels, construction, demolition operations, and entrainment of road dust into the atmosphere. Natural sources include windblown dust, wildfire smoke, and sea spray salt. The finer, $PM_{2.5}$ particulates are generally associated with combustion processes and formed as well in the atmosphere as a secondary pollutant through chemical reactions. $PM_{2.5}$ is more likely to penetrate deeply into the lungs and poses a serious health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter inhaled into the lungs remains there, and can cause permanent lung damage. These materials can damage health by interfering with the body’s mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

- **Sulfur Dioxide ($SO_2$).** $SO_2$ is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries.
- **Lead (Pb)**. Lead occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne lead in the Basin. Leaded gasoline is no longer permitted for use in on-road motor vehicles, and most lead combustion emissions are associated with off-road vehicles such as racecars. Other sources of lead include secondary lead smelters, and the manufacturing and recycling of batteries, paint, ink, ceramics, and ammunition.

- **Toxic Air Contaminants**. Toxic air contaminants are airborne substances that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health. They include both organic and inorganic chemical substances that may be emitted from a variety of common sources including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. Toxic air contaminants are different than the “criteria” pollutants previously discussed in that ambient air quality standards have not been established for them, largely because there are hundreds of air toxins and their effects on health tend to be local rather than regional.

### 4.2.2 Regulatory Framework

The federal and state governments have been empowered by the federal and state clean air acts to regulate the emission of airborne pollutants. The United States Environmental Protection Agency (USEPA) is the federal agency designated to administer air quality regulation, while the California Air Resources Board (CARB) is the state equivalent. Local control in air quality management is provided by CARB through multi-county and county-level Air Pollution Control Districts (APCD). CARB establishes statewide air quality standards and is responsible for the control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. Alhambra is under the jurisdiction of the SCAQMD, a multi-county APCD.

Both the federal and state governments have established ambient air quality standards for outdoor concentrations of various pollutants. Federal and state standards have been established for ozone ($O_3$), carbon monoxide (CO), nitrogen dioxide (NO$_2$), sulfur dioxide (SO$_2$), particulates less than 10 and 2.5 microns in diameter (PM$_{10}$ and PM$_{2.5}$), and lead (Pb). The national and state ambient air quality standards have been set at levels whose concentrations could be generally harmful to human health and welfare, and to protect the most sensitive persons from illness or discomfort with a margin of safety. Table 8 illustrates the current federal and state ambient air quality standards.
Table 8  Current Federal and State Ambient Air Quality Standards

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Federal Standard</th>
<th>California Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ozone</td>
<td>0.075 ppm (8-hr avg)</td>
<td>0.07 ppm (8-hr avg)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.09 ppm (1-hr avg)</td>
</tr>
<tr>
<td>Carbon Monoxide</td>
<td>9.0 ppm (8-hr avg)</td>
<td>9.0 ppm (8-hr avg)</td>
</tr>
<tr>
<td></td>
<td>35.0 ppm (1-hr avg)</td>
<td>20.0 ppm (1-hr avg)</td>
</tr>
<tr>
<td>Nitrogen Dioxide</td>
<td>100 ppb (1-hr avg)</td>
<td>0.18 ppm (1-hr avg)</td>
</tr>
<tr>
<td></td>
<td>0.053 ppm (annual avg)</td>
<td>0.03 ppm (annual avg)</td>
</tr>
<tr>
<td>Sulfur Dioxide</td>
<td>0.03 ppm (annual avg)</td>
<td>0.04 ppm (24-hr avg)</td>
</tr>
<tr>
<td></td>
<td>0.14 ppm (24-hr avg)</td>
<td>0.25 ppm (1-hr avg)</td>
</tr>
<tr>
<td></td>
<td>75 ppb (1-hr avg)</td>
<td></td>
</tr>
<tr>
<td>Lead</td>
<td>1.5 μg/m3 (3-month avg)</td>
<td>1.5 μg/m3 (30-day avg)</td>
</tr>
<tr>
<td>Particulate Matter (PM10)</td>
<td>150 μg/m3 (24-hr avg)</td>
<td>20 μg/m3 (annual avg)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>50 μg/m3 (24-hr avg)</td>
</tr>
<tr>
<td>Fine Particulate Matter (PM2.5)</td>
<td>15 μg/m3 (annual avg)</td>
<td>12 μg/m3 (annual avg)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>35 μg/m3 (24-hr avg)</td>
</tr>
</tbody>
</table>

ppm = parts per million, ppb = parts per billion, μg/m³ = micrograms per cubic meter
Source: CARB 2016

a. Current Ambient Air Quality

The SCAQMD monitors air pollutant levels to assure that air quality standards are met, and, if they are not met, develops strategies to meet the standards. Depending on whether or not the standards are met or exceeded, the air basin is classified as being in “attainment” or in “nonattainment.” The Basin is a non-attainment area for both the federal and state standards for ozone and PM2.5, as well as the state standard for PM10. In 2016, the Basin did not exceed the standards for carbon monoxide, nitrogen dioxide, or sulfur dioxide. Non-attainment status in the Basin is a result of several factors, primarily the naturally adverse meteorological conditions that limit the dispersion and diffusion of pollutants (surface and subsidence inversions), the limited capacity of the local airshed to eliminate pollutants from the air, and the number, type, and density of emission sources in the Basin.

In an effort to monitor the various concentrations of air pollutants throughout the Basin, the SCAQMD has divided the region into 38 source receptor areas (SRA) in which over 30 monitoring stations operate. Alhambra is located in SRA 8, which covers the west San Gabriel Valley area. Ambient air pollutant concentrations in SRA 8 are monitored in Pasadena at the South Wilson Avenue Monitoring Station and at the Glendora Laurel Monitoring Station, the next closest station in SRA8. Of the air pollutants discussed previously, only ambient concentrations of ozone and NO2 are monitored at the South Wilson Avenue Monitoring Station. Particulate matter concentrations are monitored at the Glendora Laurel Monitoring Station. Table 9 provides a summary of ambient air quality measured through the period of 2014 to 2016. As of 2016, ambient ozone concentrations in SRA 8 regularly exceed both national and state standards, while standards for the other criteria pollutants have not been exceeded during this period.
Table 9  Summary of Ambient Air Quality in the West San Gabriel Valley Area (SRA 8)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Air Quality Standards</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ozonea</td>
<td>Maximum 1-hour concentration in ppm</td>
<td>0.124</td>
<td>0.111</td>
<td>0.126</td>
</tr>
<tr>
<td></td>
<td>Number of days exceeding State 1-hour standard</td>
<td>&gt;0.09 ppm</td>
<td>6</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td>Maximum 8-hour concentration in ppm</td>
<td>0.096</td>
<td>0.085</td>
<td>0.091</td>
</tr>
<tr>
<td></td>
<td>Number of days exceeding national 8-hour standard</td>
<td>&gt;0.075 ppm</td>
<td>13</td>
<td>18</td>
</tr>
<tr>
<td></td>
<td>Number of days exceeding State 8-hour standard</td>
<td>&gt;0.070 ppm</td>
<td>13</td>
<td>18</td>
</tr>
<tr>
<td>Nitrogen Dioxidea (NO₂)</td>
<td>Maximum 1-hour concentration in ppm</td>
<td>0.075</td>
<td>0.074</td>
<td>0.071</td>
</tr>
<tr>
<td></td>
<td>Number of days exceeding State 1-hour standard</td>
<td>&gt;0.25 ppm</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Particulate Matterb &lt;10 microns (PM₁₀)</td>
<td>Maximum 24-hour concentration in µg/m³</td>
<td>78.0</td>
<td>100.6</td>
<td>75.1</td>
</tr>
<tr>
<td></td>
<td>Number of days exceeding State 24-hour standard</td>
<td>&gt; 50 µg/m³</td>
<td>na</td>
<td>na</td>
</tr>
<tr>
<td></td>
<td>Number of days exceeding national 24-hour standard</td>
<td>&gt; 150 µg/m³</td>
<td>na</td>
<td>na</td>
</tr>
<tr>
<td>Particulate Matterb &lt;2.5 microns (PM₂.₅)</td>
<td>Maximum 24-hour concentration in µg/m³</td>
<td>32.5</td>
<td>48.5</td>
<td>29.2</td>
</tr>
<tr>
<td></td>
<td>Number of days exceeding national 24-hour standard</td>
<td>&gt;0.25 µg/m³</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

a Pasadena – South Wilson Avenue Monitoring Station
b Glendora Laurel Monitoring Station
n/a = not available, insufficient data available to determine the value
Carbon Monoxide (CO) data not available
Source: CARB 2017d

b. Air Quality Management

Under state law, the SCAQMD is required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The SCAQMD updates the plan every three years. Each iteration is an update of the previous plan and has a 20-year horizon. SCAQMD released the final 2016 AQMP in March 2017. It provides a comprehensive and integrated plan primarily focused on addressing ozone standards. The plan is a regional and multi-agency effort involving SCAQMD, ARB, SCAG, and the USEPA. Federal and state planning requirements for AQMPs include developing control strategies, demonstrating attainment, documenting reasonable further progress, and implementing maintenance plans. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, RTP/SCS, and updated emission inventory methodologies for various source categories.

c. Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, including children under 14, persons aged over 65, persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. The majority of sensitive receptor
locations are therefore schools and hospitals. Alhambra Hospital Medical Center is located on South Raymond Avenue, south of West Main Street. Several other medical clinics are located throughout the City. School locations are identified in Section 4.11, Public Services.

4.2.3 Impact Analysis

Methodology and Significance Thresholds

The analysis of the Plan’s air quality impacts follows the guidance and methodologies recommended in the SCAQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (SCAQMD 2005), as well as Appendix G of the State CEQA Guidelines.

The SCAQMD has adopted numeric significance thresholds for individual development projects, but use of these thresholds would not be appropriate for a General Plan since they apply to individual projects, and this General Plan EIR considers the cumulative effects of all individual projects in the City. Therefore, the criteria used to determine the significance of impacts are taken from the checklist in Appendix G of the state CEQA Guidelines. According to the Guidelines, Plan implementation would result in a significant impact to air quality if it would:

1. Conflict with or obstruct implementation of the applicable air quality plan
2. Violate any air quality standard or contribute substantially to an existing or project air quality violation
3. 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 (including releasing emissions which exceed qualitative thresholds for ozone precursors)
4. Expose sensitive receptors to substantial pollutant concentrations
5. Create objectionable odors affecting a substantial number of people

SCAQMD is in the process of developing the Air Quality Analysis Guidance Handbook to replace the CEQA Air Quality Handbook approved by the AQMD Governing Board in 1993. While the new handbook is being prepared, SCAQMD provides supplemental information to effectively evaluate air quality emissions. This air quality analysis conforms to the recommended methodologies. The following indicators address the Plan’s consistency with the 2016 AQMP:

- Whether the project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the 2016 AQMP
- Whether the project would exceed the 2016 AQMP assumptions for 2040 or yearly increments based on the year of the project buildout
Project and Cumulative Impacts

**Threshold 1:** Would the proposed project conflict with or obstruct implementation of the applicable air quality plan

**Impact AQ-1:** Development facilitated by the Plan would result in an increase in air pollutant emissions in the Los Angeles County portion of the South Coast Air Basin. Although growth facilitated by the Plan could accommodate up to about 1,878 new residents, growth would be consistent with SCAG forecasts. Implementation of policies contained in the Plan that promote re-use, infill, and mixed-use development would help limit emissions to levels consistent with regional forecasts. Impacts would less than significant.

Long-term emissions associated with future development in Alhambra in accordance with the Plan are those associated with mobile sources (vehicle trips) and stationary sources (electricity and natural gas). Emissions associated with individual projects, depending on project type and size, could exceed project-specific thresholds established by the SCAQMD. However, such projects will be required to undergo independent, project-level CEQA review and include mitigation measures, if necessary, to address potentially significant impacts.

The discussions that follow address Plan consistency with the growth and emissions forecasts upon which the AQMP is based and with applicable AQMP control measures.

**Consistency with AQMP Growth Forecasts**

Development facilitated by the Plan could add an estimated 2,400 dwelling units and approximately 1.3 million square feet of commercial/office space to the City (see Table 7 in Section 2, Project Description). The forecast population growth would produce a net population increase of 1,878 people between 2017 and 2040. This would bring Alhambra’s population to 88,800. This growth estimate is consistent with the SCAG growth forecast shown in Table 6. As discussed in Section 2.3.6, City/Growth Buildout, future housing growth would occur on existing infill sites and all necessary infrastructure to meet housing development is already in place. Non-residential development would primarily occur in key focus areas and would be consistent with the Plan and, therefore, SCAG growth forecasts.

The Land Use and Community Design chapter of the Plan includes the following policies to promote re-use, infill, and mixed use development:

**Policy LU-1B**
Protect and enhance the unique character and identity of single-family neighborhoods.

**Policy LU-1E**
Discourage scattered multi-family development and encourage the preservation of existing, stable, single-family neighborhoods.

**Policy LU-3A**
Foster new development that is consistent with the established land use type, intensity, character, and scale of the area.

**Policy LU-3B**
Promote neighborhood cohesiveness through neighborhood-based design guidelines consistent with existing or proposed architectural themes, taking into consideration spatial definition, continuity, and building scale.
Additionally, the City's Housing Element includes the following policies to promote re-use, infill, and mixed-use development:

**Policy 1.2** Provide for the rehabilitation of existing housing in areas designated for the preservation of existing neighborhood character and density.

**Policy 3.2** Continue to provide opportunities for infill housing development in the Valley Boulevard Corridor Specific Plan Area and Central Business District Area.

**Policy 3.3** Promote mixed-use development where housing is located adjacent to jobs, shopping, services, schools, transportation corridors, and leisure opportunities.

**Policy 3.4** Identify available infill lots for future housing development opportunities.

**Policy 3.5** Explore re-use opportunities where appropriate on obsolete commercial or industrial sites.

**Policy 3.6** Continue to provide zoning provisions pursuant to State Law that allow second units in residential areas as a means to meet some affordable housing demand.

By promoting intensification and reuse of already developed lands, as opposed to low-density development on undeveloped lands, the Plan would help reduce reliance on the automobile and increase use of alternative transportation. A reduction in vehicle use and vehicle miles traveled can result in a reduction in fuel consumption and air pollutant emissions. Research indicates that infill development reduces vehicle miles traveled (VMT) and associated air pollutant emissions as compared to development on sites at the periphery of metropolitan areas, also known as "greenfield" sites. For example, a 1999 simulation study conducted for the USEPA comparing infill development to greenfield development found that infill development results in substantially fewer VMT per capita (39 percent to 52 percent) and generates fewer emissions of most air pollutants and GHGs) (see Table 10). Similarly, a 1991 study presented to the California Energy Resources Conservation and Development Commission found that a doubling of residential densities is associated with a 20 to 30 percent reduction in per capita VMT (Holtzclaw 1991). Overall, the Plan calls for redevelopment of lands and increased residential density through infill and mixed-use development (e.g., Housing Element Policy 3.3 and Policy 3.4). By increasing the overall population density of the community and encouraging mixed land uses, implementation of the Plan would largely reduce per capita automobile trips and travel distances as compared to existing conditions or lower density development more widely distributed throughout the community. This would generally reduce per capita air pollutant emissions associated with vehicle use.
Table 10  Comparison of VMT and Emissions: Infill versus Greenfield Development

<table>
<thead>
<tr>
<th>Case Study</th>
<th>Per Capita Daily VMT, Infill as a Percentage of Greenfield</th>
<th>Emissions, Infill as a Percentage of Greenfield</th>
</tr>
</thead>
<tbody>
<tr>
<td>San Diego, CA</td>
<td>52%</td>
<td>CO 88%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>NO₂ 58%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SO₂ 51%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM 58%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>CO₂ 55%</td>
</tr>
<tr>
<td>Montgomery County, MD</td>
<td>42%</td>
<td>CO 52%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>NO₂ 69%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SO₂ 110%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM 50%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>CO₂ 54%</td>
</tr>
<tr>
<td>West Palm Beach, FL</td>
<td>39%</td>
<td>CO 75%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>NO₂ 72%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SO₂ 94%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM 47%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>CO₂ 50%</td>
</tr>
</tbody>
</table>

Source: Allen et al 1999

The following policies included in the Circulation and Community Design chapters of the Plan would help reduce air pollutant emissions through circulation and land use design factors that would promote reductions in VMT. Compliance with applicable laws and regulations would also help reduce air pollutant emissions.

**Policy LU-2A**  Promote the use of high-quality design, materials, landscaping, and pedestrian connections.

**Policy LU-3D**  Incorporate streetscape design improvements for important corridors, such as Atlantic, Fremont, Valley, Main, and Garfield.

**Policy LU-6A**  Maintain a bustling urban environment with walkable streets that will allow pedestrians to feel comfortable and welcome.

**Policy LU-6B**  Enhance streetscapes and building elements to promote pedestrian activity by providing well-articulated building facades with quality building materials and workmanship, and featuring high-quality street furnishings and design.

**Policy LU-6D**  Improve the frontage zone of buildings as extensions of the building by enhancing entryways and doors, incorporating sidewalk cafes, and enhancing the space adjacent to the building as part of the pedestrian experience.

**Policy LU-7A**  Enhance commercial areas, including façade improvements, enriched streetscapes and landscaping, unified signage programs, and improved pedestrian access.

**Policy LU-8A**  Continue to implement the street tree master plan to promote pedestrian activity by establishing well-designed streetscapes, active ground floor uses, and tree-canopied sidewalks that are unique to the neighborhood.
City of Alhambra
Alhambra General Plan

Policy LU-8E  Investigate the potential for new parks, including in the I-710 right-of-way. For more details see the Quality of Life chapter.

Policy M-1C  Plan and maintain the City’s transportation facilities in a way that provides adequate and safe access for all users, including pedestrians, bicyclists, and motorists of all ages and abilities.

Policy M-2A  Ensure that new development accommodates, and does not have a negative impact on, alternative transportation.

Policy M-2B  Improve transportation infrastructure and services in a way that will increase the utility and attractiveness of alternative modes of transportation.

Policy M-2C  Improve connectivity for alternative transportation modes throughout and beyond the City.

Policy M-2D  Create transit stop amenity and access improvements at key intersections on Atlantic Boulevard and Valley Boulevard. The intersections of Atlantic/Huntington-Garfield, Atlantic/Main, and Atlantic/Valley would be the first priority, and the intersections of Fremont/Valley and Garfield/Valley would be the second priority.

Policy M-2E  Investigate and where feasible implement first-mile/last-mile supportive measures to encourage and facilitate the use of transit.

Policy M-2F  As feasible, implement improvements to the City’s bike network, as illustrated conceptually in Figure 12. The bikeway system should connect to the regional system and may need to be adjusted over time as conditions change. The bike network will include, as appropriate, enhancements to bicyclist safety and bike parking.

Given that Alhambra is almost entirely built out, the Plan includes policies promoting re-use, infill, mixed use development, and circulation and land use design factors that would promote reductions in VMT. It is not anticipated that the SCAG population forecast upon which the AQMP will be exceeded, and development facilitated by the Plan would therefore be consistent with AQMP growth forecasts and the assumptions upon which they are based.

Consistency with AQMP Control Measures
Consistency with the 2016 AQMP is also a function of consistency with applicable AQMP control measures. The AQMP includes specific control measures to reduce air pollutant emissions in order to meet Federal and State air quality standards. One of the most important methods the AQMP relies on to achieve its goals is the use of Transportation Control Measures (TCM). TCMs are defined in the 2016 AQMP as “measures for the purpose of reducing emissions or concentrations of air pollutants from transportation sources by reducing vehicle use or changing traffic flow or congestion conditions.” TCMs are described in SCAG’s Final 2016 RTP/SCS. No committed TCMs are identified in this RTP/SCS as occurring in Alhambra. Since development facilitated by the Plan is not anticipated to exceed the growth forecasts upon which the AQMP is based, the Plan would be consistent, therefore, with the AQMP.
Mitigation Measures

Development facilitated by the Plan would result in an incremental increase in emissions. However, individual development projects that could occur would be required to undergo CEQA review and would be subject to APCD thresholds and policies contained in the Plan that would help reduce air quality impacts. No mitigation measures beyond adherence to adopted policies in the 2016 AQMP and the Plan would be required.

<table>
<thead>
<tr>
<th>Threshold 2:</th>
<th>Would the proposed project violate any air quality standard or contribute substantially to an existing or projected air quality violation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Threshold 3:</td>
<td>Would the proposed project 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 (including releasing emissions which exceed qualitative thresholds for ozone precursors)</td>
</tr>
<tr>
<td>Threshold 4:</td>
<td>Would the proposed project expose sensitive receptors to substantial pollutant concentrations</td>
</tr>
</tbody>
</table>

**Impact AQ-2:** INDIVIDUAL DEVELOPMENT PROJECTS FACILITATED BY THE PLAN WOULD GENERATE CONSTRUCTION-RELATED EMISSIONS. SUCH EMISSIONS MAY RESULT IN TEMPORARY ADVERSE IMPACTS TO LOCAL AIR QUALITY. IMPLEMENTATION OF PLAN POLICIES AND COMPLIANCE WITH EXISTING REGULATIONS WOULD REDUCE CONSTRUCTION-RELATED EMISSIONS TO A LESS THAN SIGNIFICANT LEVEL. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction activity facilitated by the Plan would cause temporary emissions of various air pollutants. Ozone precursors NOx and CO would be emitted by the operation of construction equipment, while fugitive dust (PM$_{10}$) would be emitted by activities that disturb the soil, such as grading and excavation, road construction, and building construction. The Basin is a non-attainment area for both the federal and state standards for ozone and PM$_{2.5}$, as well as the state standard for PM$_{10}$. In 2016, the Basin did not exceed the standards for carbon monoxide, nitrogen dioxide, nor sulfur dioxide. Although no specific attainment goal has been established, the potential release of asbestos or other toxic air contaminants could also occur in the City, especially during building demolition. Information regarding specific development projects, soil types, and the locations of receptors would be needed in order to specifically quantify the level of emissions associated with construction activity. This information is not available given the programmatic nature of the Plan. Therefore, a more qualitative approach to characterizing construction-related air emissions has been employed for this analysis.

Construction activity that could be facilitated by the Plan is primarily focused along existing roadway corridors such as Fremont Avenue, Garfield Avenue, and Valley Boulevard. The areas targeted for change were also chosen based upon the availability of transit-oriented development opportunities and the ability to create districts that thrive in more compact forms (e.g., transit-oriented, downtown, and clustered). Detailed maps showing the locations of potential development opportunities are shown on the Vision Plan in Figure 3 of this EIR. Individual developments in these and other areas of the City would be subject to independent environmental review under CEQA. Depending upon the type, size, and timeframe of development, maximum daily construction emissions associated with individual projects could potentially exceed SCAQMD significance thresholds. However, future construction activity in the City would be subject to the following Plan policies.
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Policy R-4A  Coordinate as appropriate with SCAQMD to ensure compliance with applicable emissions standards.

Policy R-4B  Through land use decisions, minimize to the degree feasible the generation of air pollution and exposure of sensitive populations to elevated air pollution concentrations.

Policy R-4C  Use SCAQMD recommended methodologies to analyze and mitigate the air quality impacts of individual development projects.

These policies would reduce the overall level of air quality impacts related to construction during the Plan buildout period. In addition, the SCAQMD has established Rules 402 and 403, which strive to eliminate emissions of airborne pollutants and require project-specific control measures designed to reduce the level of fugitive dust entrainment, respectively. Rule 403 specifically requires the use of best available control measures for all construction activities. The major construction phases or elements specifically addressed by Rule 403 to reduce fugitive dust include earth moving, disturbed surface areas, unpaved roads, open storage piles, demolition, and other various construction activities. Rule 403 compliance by individual property owners, developers, or contractors would reduce temporary construction-related air pollutant emissions. Furthermore, each individual project facilitated by the Plan would be required to implement additional mitigation if project-specific analysis identifies the potential to exceed the applicable construction-related air pollutant emission thresholds. Adherence to applicable Plan policies and SCAQMD rules would reduce potential construction-related impacts to a less than significant level.

Mitigation Measure

Impacts would be less than significant; therefore, mitigation beyond adherence to applicable Plan policies and SCAQMD rules is not required.

<table>
<thead>
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</tr>
<tr>
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</tr>
</tbody>
</table>

Impact AQ-3: THE PLAN WOULD NOT INCREASE THE VOLUME OF TRAFFIC AT ANY ONE INTERSECTION BY THE 24,000 TO 44,000 VEHICLES PER HOUR REQUIRED TO GENERATE A CO HOT SPOT. THEREFORE, IMPACTS RELATING TO CO “HOT SPOTS” WOULD BE LESS THAN SIGNIFICANT.

Areas with high vehicle density, such as congested intersections, have the potential to create high concentrations of CO, known as CO hotspots. A project’s localized air quality impact is considered significant if CO emissions create a hotspot where either the California one-hour standard of 20 ppm, the federal one-hour standard of 35 ppm, or the federal and state eight-hour standard of 9.0 ppm is exceeded. This typically occurs at severely congested intersections (level of service [LOS] E or worse). Pursuant to SCAQMD guidance, a CO hotspot analysis should be conducted for signalized intersections where the proposed project would have a significant impact, causing the LOS to
change to E or F, or when the volume to capacity ratio (V/C) increases by two percent or more as a result of a proposed project for intersections rated D or worse (SCAQMD 2003).

As discussed in Section 4.12, Transportation and Traffic, 35 intersections operate at good LOS values (D or better) under existing conditions, while nine intersections operate at LOS E or F during the a.m. and p.m. peak hours (KOA Corporation 2017). Five intersections operate at LOS E (one during the a.m. peak hour and four during the p.m. peak hour), three intersections operate at LOS F (during the p.m. peak hour), and one intersection (Fremont Avenue and Alhambra Road) operates at LOS F during the a.m. peak hour, and LOS E during the p.m. peak hour.

A detailed CO analysis was conducted during the preparation of SCAQMD’s 2003 AQMP. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the Basin, those which would be expected to experience the highest CO concentrations. The highest CO concentration observed was at the intersection of Wilshire Boulevard and Veteran Avenue on the west side of Los Angeles near the Interstate 405 Freeway. The concentration of CO at this intersection was 4.6 ppm, well below the 35-ppm 1 hour CO federal standard. The Wilshire Boulevard/Veteran Avenue intersection has an ADT of approximately 100,000 vehicles per day.

The Plan traffic analysis demonstrates that 15 of the studied roadway segments would operate at LOS E or F in 2040, under “Future with Plan” conditions. The highest total intersection ADT for any of the studied intersections under this scenario would be about 46,500 vehicles along Fremont Avenue between Concord Avenue and Valley Boulevard, less half of the 100,000 ADT at the Wilshire Boulevard/Veteran Avenue. Furthermore, due to stricter vehicle emissions standards in newer cars, new technology, and increased fuel economy, future CO emission factors would be substantially lower than those under existing conditions. Thus, Plan-related, local, mobile-source CO emissions would not result in or substantially contribute to concentrations that would exceed ambient air quality standards for CO.

Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (BAAQMD 2011). Development facilitated by the Plan could add up to 3,533 vehicles trips on Main Street (between Atlantic Boulevard and Chapel Street) and 4,079 trips along Garfield Avenue (between Woodward Avenue and Mission Road) compared to existing conditions (see Table 31 and Table 36 in Section 4.12, Transportation/Traffic, of this EIR). Therefore, the Plan would not increase the volume of traffic at any one intersection by the 24,000 to 44,000 vehicles per hour required to generate a CO hot spot, and localized air quality impacts related to CO hot spots would be less than significant.

Lastly, the Plan would not facilitate any new sensitive receptors (such as residences, hospitals, or schools) within 500 feet of the I-10 or I-710 freeways, consistent with the buffer recommendations included in the CARB’s Air Quality and Land Use Handbook (CARB 2005).

For all the reasons discussed above, impacts related to exposing sensitive land uses to substantial pollutant concentrations would be less than significant.

**Mitigation Measure**

Impacts would be less than significant and mitigation is not required.
Threshold 5: Would the proposed project create objectionable odors affecting a substantial number of people

Impact AQ-4: IMPLEMENTATION OF THE PLAN WOULD FACILITATE DEVELOPMENT OF PROJECTS THAT HAVE THE POTENTIAL TO CAUSE ODOR IMPACTS, BUT WOULD NOT ITSELF CREATE OBJECTIONABLE ODORS THAT WOULD AFFECT A SUBSTANTIAL NUMBER OF PEOPLE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Plan would facilitate development primarily along major roadway corridors and other areas identified in Figure 3 in Section 2.3.1 of this EIR. Some commercial and industrial uses developed pursuant to the Plan may generate odors that could affect the public. Examples of commercial uses that have the potential to cause odor impacts include fast food restaurants, photographic studios, and laundry facilities. Industrial uses also have the potential to generate odors. However, odors from new commercial and industrial uses would be similar to those of such uses already existing throughout the City, and they would be concentrated in the immediate vicinity of new buildings. As such, significant odor impacts would not occur.

Construction activities could also generate temporary airborne odors during the operation of diesel powered construction vehicles and the application of architectural coatings. However, these odors are generally not considered especially offensive. Emissions would be temporary and would be confined to the immediate vicinity of the construction site. As discussed under Impact AQ-2, emission reduction strategies (SCAQMD Rule 402 and 403) specifically designed to reduce nuisance air quality and odor emissions would be applied to all new development in the City. With appropriate controls, significant odor impacts would not be anticipated and impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant. Mitigation beyond adherence to SCAQMD rules is not required.
4.3 Cultural and Tribal Cultural Resources

This section analyzes the potential impacts of the Plan on cultural resources and tribal cultural resources (TCR). Impacts to pre-historic archaeological resources and historic resources are addressed. Data used to prepare this section was also sourced from the California Office of Historic Preservation’s (OHP) Historic Property Data File.

4.3.1 Environmental Setting

Cultural resources include prehistoric resources, historic resources, and Native American resources. Prehistoric resources represent the remains of human occupation prior to European settlement. Historic resources represent remains after European settlement and may be part of a "built environment," including man-made structures used for habitation, work, recreation, education and religious worship, and may be represented by houses, factories, office buildings, schools, churches, museums, hospitals, bridges, and other structural remains. Native American resources include ethnographic elements pertaining to Native American issues and values.

The analysis considers the value of a resource to tribal cultural tradition, heritage, and identity, in order to establish potential mitigation options for TCRs and to recognize that California Native American tribes have expertise concerning their tribal histories and practices.

a. Historical Overview of Alhambra

Alhambra was part of a Spanish land grant until the early 19th century when Mexico ceded California to the United States. The land grant was subsequently subdivided into numerous smaller rancheros and the area remained in agriculture through the late 19th century when development activity began with the introduction of the railroad and the population growth that followed. The City was incorporated in 1903 and increased development took place during the following four decades. The City became completely urbanized in the period between 1940 and 1960.

The history of Alhambra is reflected in a number of older single-family neighborhoods, structures, businesses, and cultural facilities. The architectural character of Alhambra’s neighborhoods is highly valued by many members of the community, providing an aesthetic contribution to quality of life for residents and increasing property values. Craftsman-style bungalows, Spanish Colonials, Tudor-style manors, Beaux-Arts buildings, Victorian houses, and Moorish-influenced architecture all contribute to a diverse array of styles. Residential neighborhoods throughout Alhambra reflect the architectural trends current at the time of development. While new development has displaced some homes and buildings, many original structures remain standing.

The Alhambra Historical Society founded the Alhambra Historical Museum in 1987. This free public museum in Burke Heritage Park on West Alhambra Road, includes a collection of historical memorabilia, clothing, furnishings, and books donated by Alhambra residents, organizations, and friends. The museum aims to serve as an educational organization to collect, classify, publish, and disseminate historical information.

b. Past Historic Survey Efforts in Alhambra

A number of previous cultural resources investigations have been completed in Alhambra, including a historic resources survey of two neighborhoods conducted in the 1980s. The City and various individuals have also identified properties and neighborhoods as potentially having individual
and/or collective historical significance. In 2005, the City installed signs throughout Alhambra identifying historic residential tracts, including the Alhambra, Ramona Park, Midwick, Emery Park, Mayfair, Story, Marguerita–Souders, and Bean tracts. A local non-profit, Alhambra Preservation Group, established in 2003 to raise awareness about the value of historic preservation in Alhambra, has also compiled a list of architecturally significant properties, which lists nearly 600 homes, businesses, schools, churches, and other landmarks (Alhambra Preservation Group n.d.). Also, Robert Winter and David Gebhard identified other individual properties with potential cultural and/or architectural significance in *An Architectural Guidebook to Los Angeles* (Gebhard and Winter 2003). These include:

- 1000 South 2nd Street/1001 South 1st Street
- The Hat, 1 West Valley Boulevard
- Mark Keppel High School, 501 East Hellman Avenue
- Church of St. Simon and Jude, 1428 Marengo Avenue
- Los Angeles County Public Works, 900 South Fremont Avenue
- St. Steven’s Serbian Orthodox Cathedral, 1621 West Garvey Avenue

c. Designated Historic Districts and Properties

Alhambra does not have a local historic preservation program, but the City has recognized the need to maintain an attractive and aesthetically pleasing environment. In 2009, the City adopted the Single-Family Residential Design Guidelines for R-1 (Single Family Residential) zoned neighborhoods, which takes into consideration the historical context of Alhambra’s neighborhoods and provides guidance for renovation and development appropriate for Alhambra’s eight predominant architectural styles. The City’s zoning code also serves to preserve the character and integrity of existing neighborhoods. For example, Chapter 23.44 of the Zoning Code, *Design Standards*, ensures that new or modified uses and developments will harmonize with the existing or potential development of the surrounding neighborhood and produce an environment of stable, desirable character.

Potentially Eligible Designated Historic Districts

California OHP Historic Property Data File (California OHP 2012) identifies three potential historic districts in Alhambra:

- A group of five residences on Champion Place, between West Las Tunas Drive and Orienta Drive
- The 200 block of East Beacon Avenue
- A group of approximately 225 residences generally bound by South 2nd Street to the east, West Norwood Place to the north, South 9th Street to the west, and I-10 to the south

Potentially Eligible Designated Properties

Although no properties in Alhambra are currently listed in the NRHP or California Register of Historical Resources (CRHR), a number of properties in the City were found to potentially meet applicable eligibility criteria for one or both designations. As identified in the OHP’s Historic Property Data File (California OHP 2012), these include the following:

- Reid House, 816 East Alhambra Road (at the Granada Southwest corner)
- Convent of Carmel of St Therese, 215 East Alhambra Road
- Southern California Edison Granada Substation, 904 East Alhambra Road
- First United Methodist Church, 9 Almansor Street
- Holy Trinity Church Guild Hall, 9 East Grand Avenue
- Pyrenees Castle, 1700 Grandview Drive
- Garfield Inn, 341 North Garfield Avenue
- 300 North Granada Avenue
- 111 North Stoneman Avenue
- Alhambra Benevolent and Protective Order of Elks Lodge/Masonic Temple, 601 East Main Street
- F.Q. Story Residence, 502 North Story Place
- Los Angeles Gas & Electric Company, 17 South 1st Street
- Marshall Residence, 1601 South 4th Street
- Fire Station, 1215 South 6th Street
- C.F. Braun Company, 1000 South Fremont Avenue
- Ramona Convent, 1700 South Marengo Avenue
- Boy Scout Hut, 1919 South Palm Avenue
- Fire Station #74, 2505 West Norwood Street
- Graffen Residence, 1306 West Pine Street
- Alhambra Health Center, 612 West Shorb Street

d. Tribal Cultural Resources

Assembly Bill 52 Consultation

In August and September of 2016, the City of Alhambra contacted the following tribal contacts to notify them of the Plan and invite them to consult on the Plan under Assembly Bill (AB) 52:

- Gabrieleño Band of Mission Indians-Kizh Nation
- Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Soboba Band of Luiseño Indians
- Gabrieleño-Tongva Tribe
- Gabrieleño/Tongva Nation
- Gabrieleño Tongva Indians of California Tribal Council

None of these tribal contacts requested consultation.

e. Paleontological Resources

Paleontology is a science dealing with the life of past geological periods as known from fossil remains. While neither the City’s currently adopted General Plan, nor the Plan, identify any paleontological resources in the Plan Area, sub-surface paleontological resources have been found throughout southern California, and therefore such resources may also potentially exist in Alhambra.
4.3.2 Regulatory Framework

The regulatory background below offers an overview of federal, state, and local criteria used to assess historic significance, as well as Alhambra’s existing regulatory process pertaining to development projects that may impact historical resources.

a. National Register of Historic Places

The NRHP is an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment (36CFR60, Section 60.2). The National Park Service (NPS) administers the NRHP program.

The criterion for listing in the NRHP follows guidelines established by the NPS for determining the significance of properties. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that do the following:

1. Are associated with events that have made a significant contribution to the broad patterns of our history
2. Are associated with the lives of persons who are significant in our past
3. Embody the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction
4. Have yielded, or may be likely to yield, information important in prehistory or history (36CFR60, Section 60.3)

In addition to meeting any or all of the eligibility criteria listed above, properties must also possess historic integrity to be eligible for listing in the NRHP. Historic integrity is the ability of a property to convey its significance and is defined as the “authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period” (36CFR60, Section 60.3, 3). The NPS defines seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

- Location is the place where the historic property was constructed or the place where the historic event occurred.
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting is the physical environment of a historic property.
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.
- Association is the direct link between an important historic event or person and a historic property.
b. State

California Register of Historic Resources

A tribal cultural resource could be considered significant if it is eligible for listing in the CRHR. The CRHR helps government agencies identify, evaluate, and protect California’s historical resources, and indicates which properties are to be protected from substantial adverse change (Public Resources Code [PRC], Section 5024.1(a)). The CRHR is administered through the State Office of Historic Preservation, which is part of the California State Parks system.

A resource is evaluated under four CRHR criteria to determine its historical significance. To be eligible for the CRHR, a resource must be significant at the local, state, or national level in accordance with one or more of the following criteria set forth in the state CEQA Guidelines at Section 15064.5(a)(3):

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

The CRHR also requires a resource to possess integrity, defined as “the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.”

Archaeological resources can sometimes qualify as “historical resources” [state CEQA Guidelines, Section 15064.5(c)(1)]. PRC, Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person

Two other programs are administered by the State: California Historical Landmarks and California “Points of Historical Interest.” California Historical Landmarks are buildings, sites, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value. California Points of Historical Interest are buildings, sites, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value. Resources listed as Landmarks or Points of Historical Interest are automatically considered eligible for listing in the CRHR.
Impacts that adversely alter a tribal cultural resource, including those listed in or eligible for listing in the CRHR and those determined to be significant by a lead agency, are considered a significant effect on the environment. These impacts could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

**State Health and Safety Code**

State Health and Safety Code, Section 7050.5/California Public Resources Code, Section 5097.9 State Health and Safety (HSC) Code Section 7050.5 and PRC Section 5097.9 contain provisions for the treatment of human remains contained in archaeological sites. Under HSC Section 7050.5, if human remains are discovered during any project activity, the county coroner must be notified immediately. If human remains are exposed, HSC Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. Construction must halt in the area of the discovery of human remains, the area of the discovery shall be protected, and consultation and treatment shall occur as prescribed by law. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the Native American Heritage Commission (NAHC) within 24 hours. NAHC, pursuant to Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased person so they can inspect the burial site and make recommendations for treatment or disposal.

**Assembly Bill 52**

California Assembly Bill (AB) 52 of 2014, which was enacted on July 1, 2015, expands CEQA by defining a new resource category, “tribal cultural resources.” AB 52 establishes that “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is:

1. 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)

2. 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 Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.
**Senate Bill 18**

Senate Bill (SB) 18 recognizes that protection of traditional tribal cultural places is important to all tribes, whether federally recognized or not, and it provides all California Native American tribes with the opportunity to participate in consultation with city and county governments for this purpose (Governor’s Office of Planning and Research [OPR] 2005).

SB 18 establishes responsibilities for local governments to contact, provide notice to, refer plans to, and consult with tribes. The provisions of SB 18 apply only to city and county governments, and not to other public agencies. The following list briefly identifies the contact and notification responsibilities of local governments, in sequential order of their occurrence (OPR 2005):

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government’s jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code §65352.3).

- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county’s jurisdiction. The referral must allow a 45 day comment period (Government Code §65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.

- Local governments must send notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code §65092).

Under SB 18, local governments must consult with tribes under two circumstances (OPR 2005):

- On or after March 1, 2005, local governments must consult with tribes that have requested consultation in accordance with Government Code §65352.3. The purpose of this consultation is to preserve, or mitigate impacts to, cultural places that may be affected by a general plan or specific plan amendment or adoption.

- On or after March 1, 2005, local governments must consult with tribes before designating open space, if the affected land contains a cultural place and if the affected tribe has requested public notice under Government Code §65092. The purpose of this consultation is to protect the identity of the cultural place and to develop treatment with appropriate dignity of the cultural place in any corresponding management plan (Government Code §65562.5).

In addition to the notice and consultation requirements outlined above, SB 18 amended Government Code Section 65560 to allow the protection of cultural places in the open space element of the general plan. SB 18 also amended Civil Code Section 815.3 and adds California Native American tribes to the list of entities that can acquire and hold conservation easements. Tribes on the contact list maintained by the NAHC now have the ability to acquire, on terms mutually satisfactory to the tribe and the landowner, conservation easements for the purpose of protecting their cultural places (OPR 2005).
c. Local

City of Alhambra Residential Design Standards

Although the City of Alhambra does not have a historic preservation ordinance, Chapter 23.44.040, *Residential Design Standards* in the Alhambra Municipal Code, states that a property in an area “designated as having historic and cultural significance in the Historic and Cultural Resources Survey shall be designed and constructed to reflect the neighborhood theme (through the use of horizontal wood shiplap siding or wood shake, mission tile or concrete tile roof materials).”

4.3.3 Impact Analysis

Methodology and Significance Thresholds

Cultural Resources

Per CEQA Guidelines Appendix G, the Plan would have a significant effect with respect to cultural resources if it would:

1. Cause a substantial adverse change in the significance of an historical resource as defined in PRC Section 15064.5
2. Cause a substantial adverse change in the significance of an archaeological resource as defined in PRC Section 15064.5
3. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature
4. Disturb any human remains, including those interred outside of formal cemeteries

A “substantial adverse change” in the significance of a historical resource is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” [PRC Section 5020.1(6)]. Further, according to CEQA Guidelines Section 15064.5(b)(2), the significance of an historical resource is “materially impaired” when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in the California Register of Historical Resources
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources... or its identification in an historical resources survey..., unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA
According to CEQA Guidelines Section 15064.5(a), the term “historical resources” shall include the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in, the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4850 et seq.)

2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing in the California Register of Historical Resources (Public Resources Code Section 5024.1, Title 14 CCR, Section 4852), as described in the Regulatory Setting.

Tribal Cultural Resources

Per CEQA Guidelines Appendix G, an impact to tribal cultural resources from the proposed project would be significant if the following is true:

1. The project would cause a substantial adverse change in the significance of a tribal cultural resource, 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 a 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)
   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 subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.
Project and Cumulative Impacts

<table>
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<tr>
<th>Threshold 1:</th>
<th>Cause a substantial adverse change in the significance of an historical resource as defined in PRC Section 15064.5?</th>
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**Impact CUL-1:** The City of Alhambra does not currently have any registered historical resources, but the City has several locations that meet eligibility requirements for the NRHP and/or the CRHR. As identified in the Plan, the locations of City historical resource importance and the overall unique characteristics of the City are proposed to be enhanced and locally recognized rather than altered by the Plan. Therefore, impacts related to historical resources would be less than significant.

As noted in the Environmental Setting, there are several historic resources present in Alhambra. Although not registered, these districts and properties are recognized as an integral part of the culture of the City. Properties in the neighborhoods described in Section 4.3.1c are not anticipated to experience a substantial adverse change in their historical significance as a result of the Plan because they are outside of the focus areas of development shown in Figure 3, and because they would be protected by Plan goals and policies, including policies R-6B through R-6D, which promote neighborhood preservation. Similarly, the properties identified for eligibility outside of these neighborhoods would also be preserved through Plan goals and policies, including Policy R-6E and Policy R-6F, which promote preservation of individual historic and cultural resources.

The proposed goals and policies include:

**Goal R-6** Preservation of the cultural identity of Alhambra as a diverse residential and commercial City with distinct single-family neighborhoods

**Policy R-6A** Promote and encourage the preservation of Alhambra’s significant historic, architectural, cultural, archaeological, and paleontological resources.

**Policy R-6B** Promote the formation and maintenance of neighborhood associations to foster neighborhood preservation.

**Policy R-6C** Promote and maintain the unique history and architectural character of individual neighborhoods

**Policy R-6D** Update as appropriate and continue to implement design standards that maintain the character of established residential neighborhoods, as discussed in the Land Use and Community Design chapter

**Policy R-6E** Enforce applicable historic preservation laws to preserve state or federally designated historic resources and other resources (e.g., archaeological and paleontological) eligible for such designation

**Policy R-6F** Investigate the possible establishment of a local regulatory framework for the designation and protection of significant historic and cultural resources

In addition to these policies, implementation actions R4 through R8 would apply:

**Implementation Action R4** Investigate adoption of a preservation ordinance aimed at the protection of buildings, structures, and archaeological sites that are more than 50 years old and have demonstrated cultural, historical, and/or architectural significance.
Implementation Action R5
Investigate the potential for incentive programs (such as the Mills Act program) for the preservation of identified historic properties.

Implementation Action R6
Investigate private and public foundation grants following the guidance of the Office of Historic Preservation’s Incentives for Historic Preservation. Grants would assist in funding historic preservation activities in the City, such as cultural resources surveys and the rehabilitation of City-owned historic properties.

It is anticipated that that policies R-6A through R-6F and the preservation ordinance described in action R4 would involve conducting an inventory of cultural resources and a specific program to avoid the alteration or loss of resources. Incentive and grant programs would further reduce the potential for impacts to cultural resources by providing funds for resource preservation and maintenance. Implementation of these policies and implementation actions would be expected to reduce any impacts to historical resources to a less than significant level. If any future individual development project in the City would involve the alteration or removal of an identified cultural resource, it would be subject to project-level environmental review under CEQA and, as appropriate, mitigation.

Mitigation Measures
Mitigation is not needed because implementation of Plan goals, policies, and associated actions would avoid impacts to historical resources.

| Threshold 2: | Cause a substantial adverse change in the significance of an archaeological resource as defined in PRC Section 15064.5 |

Impact CUL-2: PLAN POLICIES WOULD ENCOURAGE IDENTIFICATION AND PRESERVATION OF PREVIOUSLY-UNDISCOVERED ARCHAEOLOGICAL RESOURCES. THEREFORE, THE PLAN’S IMPACT ON ARCHAEOLOGICAL RESOURCES WOULD BE LESS THAN SIGNIFICANT.

The 1986 version of Alhambra’s General Plan notes that prehistoric populations were present in Alhambra, and the City contains archaeological resource sites, but no such sites are currently known to be present (Alhambra 1986). While the Plan would not facilitate development in areas of potential archaeological resource sensitivity not already be developed under the current General Plan, the fact that prehistoric populations did exist in the Plan Area means that the potential remains for development facilitated by the Plan to affect previously-undiscovered archaeological resources.

The Resources Chapter of the Plan includes policies that would ensure that potential impacts to archaeological cultural resources are addressed in conjunction with development of individual sites within the Plan Area. These policies include:

Policy R-6A
Promote and encourage the preservation of Alhambra’s significant historic, cultural, archaeological, and paleontological resources

Policy R-6E
Enforce applicable historic preservation laws to preserve state or federally designated historic resources and other resources (e.g. archaeological and paleontological) eligible for such designation

Policy R-6F
Investigate the possible establishment of a local regulatory framework for the designation and protection of significant historic and cultural resources
Policy R-6E would require enforcement of state-required laws, including Native American consultation (AB 52, SB 18) when projects are proposed to ensure archaeological resources are not significantly impacted. Although Alhambra is built-out and the potential to encounter previously undiscovered archaeological resources is therefore low, Policy R-6F would investigate the possibility of establishing a local regulatory framework for the designation and protection of significant cultural resources. These policies would help ensure that potential impacts to previously undiscovered archaeological resources would be reduced to a less than significant level.

**Mitigation Measures**

Mitigation is not needed because the Plan policies and applicable regulations, including the required Native American consultation, would address potential impacts.

<table>
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<th>Threshold 3:</th>
<th>Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature</th>
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**Impact CUL-3**: PLAN POLICIES WOULD ENCOURAGE IDENTIFICATION AND PRESERVATION OF PREVIOUSLY-UNDISCOVERED UNIQUE PALEONTOLOGICAL RESOURCES WITHIN ROCK UNITS OR GEOLOGIC FEATURES. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

No unique paleontological resources are known to be present in Alhambra. However, previously undiscovered paleontological resources may be present in fossil-bearing soils and rock formations below the ground surface. Ground-disturbing activities in fossil-bearing soils and rock formations have the potential to damage or destroy paleontological resources that may be present below the ground surface.

The same Plan policies that would protect previously undiscovered archaeological resources would also protect paleontological resources. For example, Policy R-6F is to investigate the possibility of establishing a local regulatory framework for the designation and protection of significant cultural resources, and Policy R-6A is to promote and encourage the preservation of Alhambra’s significant historic, cultural, archaeological, and paleontological resources.

In addition, the California PRC defines any unauthorized disturbance or removal of a fossil locality or remains on public land (including lands under the jurisdiction of a City) as a misdemeanor (Section 5097.5), and requires reasonable mitigation measures where development would adversely impact archaeological or paleontological resources (Section 30244).

These policies would ensure that potential impacts to previously undiscovered paleontological resources would be reduced to a less than significant level.

**Mitigation Measures**

Mitigation is not needed because the Plan policies would address potential impacts.
Threshold 4: Disturb any human remains, including those interred outside of formal cemeteries

Impact CUL-4: PLAN POLICIES AND APPLICABLE REGULATIONS WOULD HELP REDUCE THE POTENTIAL FOR GROUND-DISTURBING ACTIVITIES ASSOCIATED WITH DEVELOPMENT UNDER THE PLAN TO RESULT IN DAMAGE TO OR DESTRUCTION OF HUMAN BURIAL GROUNDS. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Human burials outside of formal cemeteries often occur in prehistoric archaeological contexts. Although the City is built out and no development would occur in previously-undisturbed areas, the potential to encounter previously-undiscovered human remains cannot be entirely ruled out. Excavation activities facilitated by the Plan may therefore have the potential to disturb human remains, including Native American burials.

In addition to being potential archaeological resources, human burials, have specific provisions for treatment in Section 5097 of the California PRC. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) also have specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains, and protects them from disturbance, vandalism, or destruction, and established procedures to be implemented if Native American skeletal remains are discovered. PRC §5097.98 also addresses the disposition of Native American burials, protects such remains, and established the Native American Heritage Commission to resolve any related disputes.

The same policies in the Plan that would protect previously-undiscovered archaeological resources would also protect previously-undiscovered human remains. For example, Policy R-6E is to investigate the possible establishment of a local regulatory framework for the designation and protection of significant historic and cultural resources, and Policy R-6A is to promote and encourage the preservation of Alhambra’s significant historic, cultural, archaeological, and paleontological resources. As stated previously, Native American consultation, as required by state regulations, has been carried out by the City (see Impact CUL-5). No tribal cultural resources were identified through this process. This consultation, as well as consultation for future specific development proposals, will help ensure that Native American burials will be avoided. Furthermore, under HSC Section 7050.5, if human remains are discovered during any project activity, construction must stop immediately and the county coroner must be notified. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours.

These policies and regulations would help ensure potential impacts to previously-undiscovered human remains would be reduced to a less than significant level.

Mitigation Measures

Mitigation is not needed because federal and state policies and regulations would address potential impacts.
**Threshold 5:** The project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape 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)

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 subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

**Impact CUL-5:** There are currently no listed or eligible tribal cultural resources in the Plan Area. Letters requesting consultation were sent to tribal contacts during development of the Plan, as required by State law, but no responses were received. Because no tribal cultural resources have been identified, and because the regulations requiring this process would continue to apply to future activities facilitated by the Plan, impacts to tribal cultural resources would be less than significant.

No TCRs listed on or eligible for listing on the CRHR or a local register. In addition, no responses sent to tribal contacts (as required under AB 52), were received. While there is always potential to uncover buried archaeological resources (including tribal cultural resources) during ground disturbing activities, the policies and regulations protecting cultural resources described in the impact discussions above would help avoid impacts to previously-undiscovered tribal cultural resources as well. Additionally, the state regulations requiring tribal consultation would continue to apply to projects facilitated by the Plan. Potential impacts to tribal cultural resources would therefore be less than significant with implementation of Plan policies and existing regulations.

**Mitigation Measures**

No mitigation measures are necessary, since the Plan Area does not contain any identified tribal cultural resources; State-required Native American consultation processes have been carried out for the proposed project; and would continue to be required, as applicable, to future projects.
4.4 Geology and Soils

This section of the EIR analyzes the potential physical environmental effects of Plan implementation related to seismic hazards, underlying soil characteristics, slope stability, erosion, and existing mineral resources. Data used to prepare this section was obtained from the existing City of Alhambra General Plan (Alhambra 1986), the California Department of Conservation (DOC), the California Geological Survey (CGS), and other sources.

4.4.1 Environmental Setting

a. Regional Topography

Alhambra lies on the western edge of the San Gabriel Valley, an alluvial plain created by the weathering of the San Gabriel Mountains. The plain slopes generally to the southeast at about 1.05 feet for every 100 feet. The mean elevation of the City is 460 feet above sea level with a range in elevation from 380 feet in the southeastern portion of the City to 580 feet in the northwest corner. The City’s topography is relatively level in most areas, with no significant hillside areas or slopes, other than hills near the western and southern edges of the City, and slopes created by San Pascual Wash and Alhambra Wash in the eastern part of the City. Figure 22 shows the City’s topographical features (United State Geologic Service [USGS] 2015a, 2016a). The major environmental factors controlling stability of the steeper slopes include precipitation, topography, geology, soils, vegetation, and man-made alterations of the natural topography.

b. Regional Geologic Setting

Alhambra encompasses approximately 7.6 square miles in the south-central area of Los Angeles County. It is situated in the western edge of the San Gabriel Valley. The City is bordered by the City of Los Angeles and the northern terminus of the Long Beach Freeway (I-710) to the west, by South Pasadena and San Marino to the north, San Gabriel to the east, and Monterey Park to the south. The southern portion of the city encompasses the San Bernardino Freeway (I-10), which traverses the City from east to west.

Alhambra is generally underlain by gravely loams, sandy loams, and clays (Alhambra 1986). Figure 23 depicts the soil types underlying the City.

Alhambra is located in the northern part of the Peninsular Ranges geomorphic province of California. The Peninsular Ranges is a series of ranges separated by northwest trending valleys, subparallel to faults branching from the San Andreas Fault. The trend of topography is similar to the Coast Ranges (northwest trend), but the geology is more like the Sierra Nevada, with granitic rock intruding the older metamorphic rocks. The Peninsular Ranges extend into lower-California and are bound on the east by the Colorado Desert. This province includes the Los Angeles Basin and the island group (Santa Catalina, Santa Barbara, and the distinctly terraced San Clemente and San Nicolas islands), together with the surrounding continental shelf (cut by deep submarine fault troughs) (CGS 2002).
Figure 22 Topographic Map of Alhambra
Figure 23 Soil Types in Alhambra

- City of Alhambra
- Gravel & sand of major streams, and alluvial fan detritus (Holocene)
- Alluvium (Holocene)
  - Slightly elevated & locally dissected alluvial gravel and sand at base of hill areas (Pleistocene)
- Marine claystone- Repetto Memeber (Pliocene)
  - Gray to light brown, thin bedded, silty clay shale (Miocene)
- White-weathering, thin bedded, platy, siliceous shale (Miocene)

Imagery provided by ESRI and its licensors © 2017.
Additional data provided by United States Geological Survey (USGS) 2015.
c. Seismic Setting

Faults generally produce damage in two ways: surface rupture and seismically induced ground shaking. Surface rupture is limited to areas very near the fault, while ground shaking can affect a wide area.

The U.S. Geological Survey defines active faults as those that have had surface displacement in Holocene time (about the last 11,000 years). Surface displacement can be recognized by the existence of cliffs in alluvium, terraces, offset stream courses, fault troughs and saddles, the alignment of depressions, sag ponds, and the existence of steep mountain fronts. Potentially active faults are ones that have had surface displacement during the last 1.6 million years. Inactive faults have not had surface displacement in the last 1.6 million years.

The locations of some of the faults closest to Alhambra are shown in Figure 24. No active faults are known or suspected to traverse Alhambra and the City is not included in a special seismic zone established by the Alquist-Priolo Special Studies Zones Act of 1972. The East Montebello fault does cross into and then end in the City, but is not considered an active fault in Alhambra. Seismic activity from nearby faults, including those that together form the Sierra Madre fault zone, the East Montebello fault, the Raymond fault, the Hollywood fault, the Eagle Rock fault, the Verdugo fault, and the Elsinore fault zone, could cause substantial damage from ground shaking in the event of a major earthquake, but little or no damage is expected from surface rupture or liquefaction. Several major faults within the southern California region, including the San Andreas Fault, located approximately 25 miles north of the City, and the Newport-Inglewood fault, located approximately 15 miles to the southwest, have the potential for substantial damage in the event of a major earthquake. The San Andreas Fault is expected to be the source of major earthquake within the next 30 years with a Richter magnitude exceeding 8.0.

Although there are no known active faults in Alhambra, the aforementioned fault systems could cause property damage, possibly resulting in injury and loss of life in the event of a major earthquake due to ground motion. The level of impact resulting from any seismic activity will depend on factors such as: distance from epicenter, earthquake magnitude, and characteristics of soils and subsurface geology. Figure 25 depicts landslide hazard zones in Alhambra and Figure 26 depicts liquefaction seismic hazard zones near Alhambra (there are none in the City), as delineated by the California Department of Conservation.

d. Seismic and Soil-Related Hazards

As described above, faults generally produce damage in two ways: ground shaking and surface rupture. Seismically induced ground shaking covers a wide area and is greatly influenced by the distance of the site to the seismic source, soil conditions, and depth to groundwater. Surface rupture is limited to very near the fault. Other hazards associated with seismically induced ground shaking include earthquake-triggered landslides and tsunamis. Tsunamis and seiches are associated with ocean surges and inland water bodies, respectively. Neither of these hazards would affect the Plan Area because of the distance between the Plan Area and such bodies of water and the fact that the City has a mean elevation of 460 feet above sea level. Soil related hazards include expansive soils, subsidence, settlement, liquefaction, and landslides. These types of hazards and the areas of the City that have the potential for such failure are discussed on the following pages.
Figure 24 Fault Map of Alhambra

[Map showing fault lines and boundaries of Alhambra]

Alhambra City Boundary
Fault
0 1.5 3 Miles

Base map data provided by Esri and its licensors © 2018.
Figure 25 Landslide Hazard Zones of Alhambra
Figure 26 Liquefaction Hazard Zones of Alhambra
Seismically Induced Ground Shaking

Seismic ground-shaking could be experienced in Alhambra due to seismic activity along other faults in southern California, depending upon the location of the earthquake epicenter and the character and duration of the seismic event. Specific effects of a seismic event on the Plan Area would depend upon characteristics of the underlying soil and rock, as well as the building materials and techniques used in construction.

Liquefaction

Liquefaction is defined as the sudden loss of soil strength due to a rapid increase in soil pore water pressures resulting from seismic ground shaking. Liquefaction potential is dependent on such factors as soil type, depth to ground water, degree of seismic shaking, and the relative density of the soil. During ground shaking, the alluvial grains are packed into a tighter configuration. Pore water is squeezed from between the grains, increasing the pore pressure. As the pore pressure increases, the load bearing strength of the material decreases. When liquefaction of the soil occurs, buildings and other objects on the ground surface may tilt or sink, and lightweight buried structures (such as pipelines) may float toward the ground surface. Liquefied soil may be unable to support its own weight or that of structures that could result in loss of foundation bearing or differential settlement. As a result, structures built on this material can sink into the alluvium, buried structures may rise to the surface or materials on sloped surfaces may run downhill. Liquefaction may also result in cracks in the ground surface followed by the emergence of a sand-water mixture. Other effects of liquefaction include lateral spread, flow failures, ground oscillations, and loss of bearing strength. Liquefaction hazard areas near Alhambra (there are none within the City) are depicted in Figure 26.

Lateral Spreading

Lateral spreading, closely related to liquefaction, occurs when a subsurface layer liquefies and gravitational and inertial forces cause the layer, and the overlying non-liquefied material, to move in a downslope direction. The potential for lateral spreading is highest in areas underlain by soft, saturated materials, especially where bordered by sloping banks or inclined planes to an adjacent open face bank or slope.

Lurching

Ground-lurching is the horizontal movement of soil, sediments, or fill located on relatively steep embankments or scarps as a result of seismic activity, forming irregular ground surface cracks. Like lateral spreading, the potential for lurching is highest in areas underlain by soft, saturated materials, especially where bordered by steep banks or adjacent hard ground.

Tsunamis

Tsunamis occur when large areas of the submerged continental shelf or slope are rapidly displaced vertically. Alhambra is located approximately 20 miles northeast from the Pacific Ocean at a mean elevation of 460 feet above sea level. Consequently, there is no potential for tsunami damage in the City.

Dam Inundation

Two dams are located near Alhambra: Devil’s Gate Reservoir on the Arroyo Seco River, approximately 6.0 miles northwest of the City; and the Eaton Wash Reservoir on the Eaton Wash,
approximately 4.5 miles northeast of the City. The City would not be directly impacted by failure of these dams as the inundation areas do not fall within the City boundaries. The Devil’s Gate Reservoir’s inundation areas include various areas along the Arroyo Seco River, which flows north and west of the City, along State Route 110. The Eaton Wash Reservoir’s inundation area includes areas south of the reservoir along the Eaton Wash, which flows northeast and east of the City (Los Angeles County Flood Control District 2013).

**Seiche**

Seiches are earthquake-generated waves in enclosed or restricted bodies of water. Because no sizable lakes or reservoirs are present in the City; however, no seiche hazards exist in Alhambra.

**Expansive Soils**

During periods of water saturation, soils with high clay content tend to expand. Conversely, during dry periods, the soils tend to shrink. The amount of volume change depends upon the soil swell potential (amount of expansive clay in the soil), availability of water to the soil, and soil confining pressure. Swelling occurs when the soils containing clay become wet due to excessive water from poor surface drainage, over irrigation of lawns and planters, and sprinkler or plumbing leaks. These volume changes with moisture content can cause cracking of structures built on expansive soils. In addition, swelling clay soils can cause distress to lightly loaded structures, walks, drains, and patio slabs. Expansive soils could potentially be encountered throughout Alhambra. As shown in Figure 23, there are several soil types in the City. The majority of the City is underlain by Older Dissected Surficial Sediments (Qae/Qa), which include alluvium soils consisting of unconsolidated deposits of silt, sand, and gravel. Other soils include Surficial Sediments (Qg), which include gravel and sand of major streams and alluvial fan detritus; Unnamed Shale (Tush) soils, which are thinly bedded silty clay shale; Fernando Formation (Tfr) soils, which are marine claystone; and Monterey Formation soils (Tmsh), which are white-weathering, thinly bedded, platy, siliceous shale, which is locally porcelaneous and silty. The Tush and Tfr soils have some clay content and are therefore potentially expansive. These soils are located primarily in the southwestern portion of the City.

**Subsidence**

Subsidence is the lowering of ground surface. It often occurs as a result of withdrawal of fluids (such as water and oil), and gas, from the subsurface. When these materials are removed from the subsurface, the overburden weight, which they had previously helped support through buoyant forces, is transferred to the soil structure. Subsidence typically occurs over a long period of time and results in a number of structural impacts. Facilities most affected by subsidence are long, surface infrastructure facilities such as canals, sewers, and pipelines.

The extraction of groundwater from an aquifer beneath an alluvial valley can result in subsidence or settlement of the alluvial soils. The factors that influence the potential occurrence and severity of alluvial soil settlement due to groundwater withdrawal include: degrees of groundwater confinement; thickness of aquifer systems; individual and total thickness of fine-grained beds; and compressibility of the fine-grained layers. No known areas of subsidence occur in the City.

**Slope Stability and Landslides**

Landslides result when the driving forces that act on a slope (such as the weight of the slope material, and the weight of objects placed on it) are greater than the slope’s natural resisting forces (i.e., the shear strength of the slope material). Slope instability may result from natural processes,
such as the erosion of the toe of a slope by a stream, from ground shaking caused by an earthquake, or from artificial modification such as grading or addition of water or structures to a slope. Development on a slope can substantially increase the frequency and extent of potential slope stability hazards. Steep, unstable slopes in weak soil/bedrock units that have a record of previous slope failure typically characterize areas susceptible to landslides. Numerous factors affect the stability of the slope, including: slope height and steepness, type of materials, material strength, structural geologic relationships, ground water level, and level of seismic shaking. Potential landslide hazard areas in the Plan Area are depicted on Figure 25. Landslide hazard areas are limited to small areas in the northwestern and southwestern parts of the City.

**Erosive Soils**

Soil erosion is the removal of soil by water and wind. The rate of erosion is estimated from four soil properties: texture, organic matter content, soil structure, and permeability. Other factors that influence erosion potential include the amount of rainfall and wind, the length and steepness of the slope, and the amount and type of vegetative cover. The topographical terrain of the City features minimal hillside terrain, but there is some erosive soil potential in these hillside areas.

**e. Regulatory Setting**

The Alhambra General Plan, the California Building Code (CBC) with City of Alhambra amendments, and the City of Alhambra Municipal Code attempt to safeguard life or limb, health, property, and public welfare in Alhambra. The Environmental Management Element of the City’s current General Plan (adopted in 1986) is concerned with both the man-made and natural environment of the City, and examines existing resources and evaluates the potential for environmental and personal harm resulting from various hazards, including geologic hazards such as seismicity. These same geologic issues are addressed in the Health & Safety chapter of the Plan. Alhambra uses the Los Angeles County Building Code, with City of Alhambra amendments, as well as the City of Alhambra Municipal Code, to control building design and construction. The Los Angeles County Building Code is based on the California Building Codes. The City of Alhambra, along with all of southern California, is in Seismic Zone 4, the area of greatest seismic risk subject to the strictest building standards.

**4.4.2 Impact Analysis**

**a. Methodology and Significance Thresholds**

Per CEQA Guidelines Appendix G, impacts related to geology and soils would be potentially significant if implementation of the Plan would:

1. Result in exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
   a. 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
   b. Strong seismic ground shaking
   c. Seismic-related ground failure, including liquefaction
   d. Landslides
2. Result in substantial soil erosion or the loss of topsoil
3. Be located on a geologic unit or soil that is unstable, or that would become unstable, as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse
4. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property
5. 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

b. Project and Cumulative Impacts

<table>
<thead>
<tr>
<th>Threshold 1: Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. 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</td>
</tr>
<tr>
<td>b. Strong seismic ground shaking</td>
</tr>
</tbody>
</table>

**Impact GEO-1**: **Future seismic events could produce ground shaking in the Plan Area that could damage structures and/or create adverse health and safety effects. However, with implementation of Plan policies and required building codes, impacts would be less than significant.**

No active faults have been mapped in Alhambra, but the City lies in a seismically active region prone to periodic earthquakes. According to the Fault Activity Map of California, there are eight active or potentially active faults and fault zones within approximately 10 miles of Alhambra (DOC 2010b). These eight faults are shown in Figure 24 and listed in Table 11, which also shows that the range of maximum probable moment magnitudes for earthquakes emanating from these faults ranges from 6.5 to 7.5. These faults, as well as the San Andreas Fault (located approximately 25 miles north of the City, with a maximum probable moment magnitude of 8.0), are all capable of affecting Alhambra (Southern California Earthquake Data Center 2013a – 2013g).

**Table 11 List of Faults Near Alhambra**

<table>
<thead>
<tr>
<th>Fault Name</th>
<th>Active or Potentially Active Fault/Zone</th>
<th>Approximate Distance and Direction Between Plan Area and Fault Line (miles)</th>
<th>Estimated Maximum Earthquake Magnitude (Mw)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hollywood</td>
<td>Active</td>
<td>6.5 Northwest</td>
<td>6.5</td>
</tr>
<tr>
<td>East Montebello</td>
<td>Potentially active</td>
<td>0.0 within City limits</td>
<td>7.2</td>
</tr>
<tr>
<td>Eagle Rock</td>
<td>Potentially active</td>
<td>0.7 North</td>
<td>6.8</td>
</tr>
<tr>
<td>Raymond</td>
<td>Active</td>
<td>0.5 North</td>
<td>7.0</td>
</tr>
<tr>
<td>Sierra Madre Fault Zone</td>
<td>Active</td>
<td>5.2 North</td>
<td>7.0</td>
</tr>
<tr>
<td>Verdugo</td>
<td>Active</td>
<td>5.5 Northwest</td>
<td>6.8</td>
</tr>
<tr>
<td>San Gabriel Fault Zone</td>
<td>Potentially active</td>
<td>6.5 North</td>
<td>7.3</td>
</tr>
<tr>
<td>Elsinore Fault Zone</td>
<td>Potentially active</td>
<td>6.0 Southeast</td>
<td>7.5</td>
</tr>
</tbody>
</table>

Mw = moment magnitude

Sources: DOC 2010a; 2010b; Southern California Earthquake Data Center 2013a – 2013g, Caltrans 2014
Faults generally produce damage in two ways: surface rupture and seismically induced ground shaking. Surface rupture is generally limited to areas very near the fault, while ground shaking can affect a wide area. Groundshaking is typically reduced to the ground motion components wave velocity and acceleration. The velocity, acceleration, and predominant period of groundshaking at a given site are dependent upon the distance to the fault, the magnitude of the earthquake, and the fracture mechanics of the earthquake. Groundshaking also depends on the nature of the bedrock, alluvium, and soil through which shock waves must travel. Generally, shock waves attenuate with distance from the focus of the earthquake.

The Health and Safety chapter of the Plan includes the following goals and policies intended to minimize the risks associated with seismic related hazards:

**Goal HS-2** Minimization of impacts to people and property due to seismic threats

**Policy HS-2A** Minimize the loss of life, serious injuries, and major social and economic disruption caused by damage to vulnerable buildings in an earthquake

**Policy HS-2B** Require new developments and existing public facilities to comply with established seismic safety standards and consider location-specific seismic hazards

**Policy HS-2C** Promote the upgrade of seismically hazardous buildings for the protection of health and safety

**Policy HS-2D** Ensure that current geologic knowledge and state-certified professional review are incorporated into the design, planning, and construction stages of development projects, and that site specific data are applied to each project

**Policy HS-2E** Ensure to the fullest extent possible that, in the event of a major disaster, essential structures and facilities remain safe and functional, as required by current law. Essential facilities include hospitals, police stations, fire stations, emergency operation centers, communication centers, generators and substations, and reservoirs

**Policy HS-2F** Ensure to the fullest extent possible that, in the event of a major disaster, dependent care and high-occupancy facilities will remain safe

**Policy HS-2G** Educate the public on the hazards that seismic activities can pose to the City and its residents

**Goal HS-5** Prevention and minimization of the adverse effects of emergencies

**Policy HS-5A** Plan for emergency response and recovery from urban disasters such as earthquake and terrorist threats

**Policy HS-5B** Make the public aware of City emergency response plans, procedures, resources, risk reduction strategies, and mitigation measures

Nothing can ensure that structures do not fail under seismic stress, but proper engineering, including compliance with the policies above, the Los Angeles County Building Code, with City of Alhambra amendments, the City of Alhambra Municipal Code, and the policies described above would minimize the risk to life and property, resulting in a less than significant impact from groundshaking.
### Mitigation Measures

Mitigation beyond compliance with applicable Plan policies and provisions of applicable building codes is not required.

<table>
<thead>
<tr>
<th>Threshold 1:</th>
<th>Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>c) Seismic-related ground failure, including liquefaction</td>
</tr>
</tbody>
</table>

| Threshold 3: | Be located on a geologic unit or soil that is unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse |

### Impact GEO-2: Future seismic events are unlikely to result in liquefaction and lateral spreading of soils in the Plan Area. Additionally, development in the Plan Area would be subject to compliance with applicable building codes. Impacts would be less than significant.

As identified in the Plan’s Health and Safety Element, and shown in Figure 26, no liquefaction hazard zones are located in Alhambra. Development in the Plan Area would be subject to compliance with the applicable building codes. As such, Plan impacts related to liquefaction would be less than significant.

### Mitigation Measures

Mitigation beyond compliance with applicable Plan policies and provisions of the applicable building codes is not required.

<table>
<thead>
<tr>
<th>Threshold 1:</th>
<th>Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>d) Landslides</td>
</tr>
</tbody>
</table>

| Threshold 2: | Result in substantial soil erosion or the loss of topsoil                                                                  |

### Impact GEO-3: The southern and northwestern parts of Alhambra contain slopes that present moderate to severe slope stability hazards. Landslides have the potential to damage and destroy structures, roadways and other improvements, as well as to deflect and block drainage channels, causing further damage and erosion. Compliance with applicable building codes would generally address landslide hazards. As described in the Plan policies, project-specific mitigation measures would ensure that sites are remediated in accordance with City requirements to ensure appropriate safety levels. Impacts would be less than significant.

Alhambra is characterized by relatively level terrain with no significant hillside areas or slopes, other than hills near the western and southern edges of the City, and slopes created by San Pascual Wash and Alhambra Wash in the eastern part of the City. Slope instability hazards are present at the hills at the western and southern edges of the City. As shown on Figure 25, parts of the City are in landslide zones identified by the USGS and the State of California Department of Conservation, Division of Mines and Geology (USGS 1999). Properties in identified landslide hazard zones would have the potential for landslide-related damage.

Areas in Alhambra adjacent to identified landslide hazard zones include land west of the West Garvey Avenue and Casuda Canyon Drive intersection; land west of the South Fremont Avenue and...
Loma Vista Drive intersection; and the Emery Park Hills area between West Main Street, South Meridian Avenue, Poplar Boulevard, and Westmont Drive. The Plan would not increase allowable development intensity in these slope instability hazard areas, however, nor would the Plan involve any future actions that would increase the likelihood or severity of landslides. Nevertheless, development that could occur in these areas would continue to be subject to landslides, slumps, mudslides, or debris flows that could cause substantial damage and disruption to buildings and infrastructure. Impacts from these types of soil hazards are generally reduced to a less than significant level through the standard development review process. Standard building and grading procedures would reduce most soil hazards to a less than significant level. These include geotechnical engineering of landslide areas to ensure that slopes would not become destabilized during grading activities; and on-site soil investigations to identify local hazard conditions, which are then reduced through implementation of appropriate engineering designs and construction techniques and through proper site improvements.

In general, the primary remedial measure to be employed during grading is the removal of the slump or debris slide from the top to the toe. The potential for destabilization or activation of mass wastage areas increases with an increase in the amount of proposed earthwork. Debris flows typically form in response to local intense rainfall in steep swale areas filled with saturated, fine-grained soils. Portions of the Plan Area, because of their relatively steep topography, have a moderate debris flow potential. Based on review and approval by the City, remedial measures may be designed and implemented based on sound, demonstrated engineering principles to reduce potential hazards to the site and off-site properties, and then incorporated into the site plan and actual development to minimize overall permanent impacts.

The Health and Safety Chapter of the Plan includes the following policies that are intended to minimize human exposure to slope instability and potential landslide areas:

**Policy HS-1A** Minimize the risk to life or limb, and property damage resulting from soil-related hazards

**Policy HS-1B** Continue to enforce building code requirements to minimize exposure to geologic hazards

**Policy HS-2B** Require new developments and existing public facilities to comply with established seismic safety standards and consider location-specific seismic hazards

**Policy HS-2D** Ensure that current geologic knowledge and state-certified professional review are incorporated into the design, planning, and construction stages of development projects, and that site specific data are applied to each project

The City of Alhambra is following the California Building Code with Los Angeles County requirements, and has also established geologic and geotechnical standards to review geologic and geotechnical studies. These standards include specific guidelines for the process and analysis to be performed for each site by the geology and geotechnical consultant. All geotechnical reports are reviewed to ensure that the policies and standards of the geology and geotechnical guidelines, as well as customary industry practices, have been met. The review process also ensures that the geotechnical report and associated plans provide suitable project-specific measures, consistent with Plan policies and applicable codes, to reduce potential geotechnical hazards to acceptable levels. As such, the City will continue to ensure that the landslide hazards are analyzed and that appropriate recommendations and remedial measures are implemented. Impacts would therefore be less than significant.
Mitigation Measures

Mitigation beyond compliance with applicable Plan policies and provisions of the applicable building codes is not required.

<table>
<thead>
<tr>
<th>Threshold 4:</th>
<th>Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property?</th>
</tr>
</thead>
</table>

**Impact GEO-4:** Development facilitated by the Plan may result in the construction of structures on expansive soils that could create a substantial risk to life or property. All new development would be required to comply with the standards of the CBC, however, which would ensure that expansive soils are remediated or that foundations and structures are engineered to withstand the forces of expansive soil. Compliance with the requirements of the CBC would reduce this impact to a less than significant level.

Expansive soils are generally clayey and swell when wetted and shrink when dried. Wetting can occur naturally in a number of ways, (e.g., absorption from the air, rainfall, groundwater fluctuations, lawn watering and broken water or sewer lines). In hillside areas, as expansive soils expand and contract, gradual downslope creep may occur, eventually causing landslides. Clay soils also retain water and may act as lubricated slippage planes between other soil/rock strata, also producing landslides, often during earthquakes or by unusually moist conditions. The shrink-swell characteristics of soils can vary widely within short distances, depending on the relative amount and type of clay. Expansive soils are also often prone to erosion. Foundations of structures placed on expansive soils may swell during the wet season and shrink during the succeeding dry season, potentially resulting in foundation damage.

As described in the Expansive Soils subsection of Section 4.4-1(d), Environmental Setting, relatively small portions of Alhambra, primarily in the southwestern area of the City, are located on potentially expansive soils. The focus areas for new development included in the Plan (shown in Figure 3) do not lie in these areas. New development or redevelopment constructed on potentially expansive soils would also be required to comply with the CBC, which includes requirements to address soil-related hazards. Typical measures to treat hazardous soil conditions involve removal, proper fill selection, and compaction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist the forces of expansive soils. Compliance with the requirements of the CBC would reduce impacts related to expansive soils to a less than significant level. The Plan provides the following policy relating to soil-related hazards, including expansive soils:

**Policy HS-1A** Minimize the risk to life or limb, and property damage resulting from soil-related hazards

With adherence to the Plan policies and CBC requirements, impacts related to expansive soils would be less than significant.

Mitigation Measures

Mitigation beyond compliance with applicable Plan policies and provisions of the applicable building codes is not required.
Threshold 5: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Impact GEO-5: All of Alhambra is connected to sewer systems that are tied directly to the facilities of the Sanitation Districts of Los Angeles County (LACSD). The City does not use septic tanks or alternative wastewater disposal systems. Therefore, the Plan would have no impact related to soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

Alhambra’s existing sewer collection system is made up of a network of gravity sewers, pump stations, and force mains. The majority of the local sewers tie directly into one of the LACSD trunk sewers crossing through the City. Because the entire City is served by public wastewater conveyance and treatment systems, no septic tanks or alternative wastewater disposal systems are used in the City (Alhambra 2014), and the Plan would have no impact in this regard.

Mitigation Measures
Mitigation is not required because the City does not rely on septic sewer systems or alternative wastewater disposal systems.
4.5 Greenhouse Gas Emissions

This section discusses potential impacts relating to greenhouse gases and climate change.

4.5.1 Environmental Setting

a. The Greenhouse Effect and Greenhouse Gases

Climate change is the observed increase in the average temperature of the Earth’s atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. The term “climate change” is often used interchangeably with the term “global warming,” but “climate change” is preferred to “global warming” because it helps convey that there are other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming during the past 150 years. Per the United Nations Intergovernmental Panel on Climate Change (IPCC 2014), the understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (95 percent or greater chance) that the global average net effect of human activities has been the dominant cause of warming since the mid-twentieth century (IPCC 2014).

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Emissions of CO₂ are largely by-products of fossil fuel combustion, whereas CH₄ results from off-gassing associated with agricultural practices and landfills. Observations of CO₂ concentrations, globally-averaged temperature, and sea level rise are generally well within the range of the extent of the earlier IPCC projections. The recently observed increases in CH₄ and N₂O concentrations are smaller than those assumed in the scenarios in the previous assessments. Each IPCC assessment has used new projections of future climate change that have become more detailed as the models have become more advanced.

Man-made GHGs, many of which have greater heat-absorption potential than CO₂, include fluorinated gases and SF₆ (California Environmental Protection Agency [CalEPA] 2006). Different types of GHGs have varying levels of global warming potential (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as “carbon dioxide equivalent” (CO₂e), and is the amount of a GHG emitted multiplied by its GWP. CO₂ has a
100-year GWP of one. By contrast, CH₄ has a GWP of 25, meaning its global warming effect is 25 times greater than CO₂ on a molecule per molecule basis (IPCC 2007).

The accumulation of GHGs in the atmosphere regulates the earth’s temperature. Without the natural heat-trapping effect of GHGs, Earth’s surface would be about 34 degrees Celsius cooler (CalEPA 2006). However, it is believed that emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations. The primary GHGs of concern include carbon dioxide, methane, nitrous oxide, and fluorinated gases (HFCs, PFCs, and SF₆). These all contribute to climate change on a global scale and climate change affects numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. See Appendix D for a description of each GHG and the potential effects of climate change.

b. Greenhouse Gas Emissions Inventory

Based upon the California Air Resources Board (CARB) California Greenhouse Gas Inventory for 2015, California produced 440.4 million metric tons of carbon dioxide equivalent (MMT of CO₂e) (CARB 2017a). The major source of GHG in California is transportation, contributing 39 percent of the state’s total GHG emissions. Industrial sources are the second largest source of the state’s GHG emissions, contributing 23 percent of the state’s GHG emissions (CARB 2017a). California emissions are due in part to its large size and large population compared to other states. However, the state’s mild climate reduces California’s per capita fuel use and GHG emissions as compared to other states. CARB has projected statewide unregulated GHG emissions for the year 2020 will be 509.4 MMT CO₂e (CARB 2017b). These projections represent the emissions that would be expected to occur in the absence of any GHG reduction actions.

In 2013, the City of Alhambra adopted an Energy Efficiency Chapter of a Climate Action Plan (EECAP). In the plan, a GHG inventory was prepared for the City for baseline years 2005 and 2010, and forecasted for the year 2020. Community-wide emissions totaled 516,680 metric tons of carbon dioxide equivalent (MT CO₂e) for 2005, 487,140 MT CO₂e in 2010, and an estimated forecast of 430,690 MT CO₂e for the year 2020. The 2020 forecasted emissions would achieve the 15 percent reduction below 2005 levels, as required in Assembly Bill (AB) 32 (Alhambra 2013).

4.5.2 Regulatory Framework

a. California Regulations

The following California regulations address both climate change and GHG emissions. For international and federal regulations, see Appendix D.

The State of California considers GHG emissions and the impacts of climate change to be a serious threat to the public health, environment, economic well-being, and natural resources of California, and has taken an aggressive stance to mitigate the State’s impact on climate change through the adoption of policies and legislation. CARB is responsible for the coordination and oversight of state and local air pollution control programs in California. California has numerous regulations to reduce the State’s GHG emissions. Some of the major initiatives are summarized below.
Executive Order S-3-05

In 2005, the governor issued Executive Order (EO) S-3-05, which identifies statewide GHG emission reduction targets to achieve long-term climate stabilization as follows:

- Reduce GHG emissions to 1990 levels by 2020; and
- Reduce GHG emissions to 80 percent below 1990 levels by 2050.

In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the “2006 CAT Report”) (CalEPA 2006). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture, etc.

Assembly Bill 32

California’s major initiative for reducing GHG emissions is outlined in Assembly Bill (AB) 32, the “California Global Warming Solutions Act of 2006,” signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 (essentially a 15 percent reduction below 2005 emission levels, the same requirement as under S-3-05), and requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of the state’s largest industrial emitters.

CARB approved the initial AB 32 Scoping Plan on December 11, 2008 and a 2020 statewide GHG emission limit of 427 MMT of CO\(_2\)e was established. The Scoping Plan also included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan. The 2013 Scoping Plan update defines CARB’s climate change priorities for the next five years and sets the groundwork to reach post-2020 statewide goals. The update highlights California’s progress toward meeting the “near-term” 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluates how to align the State’s longer-term GHG reduction strategies with other State policy priorities, such as for water, waste, natural resources, clean energy and transportation, and land use (CARB 2018).

Senate Bill 97

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in CEQA documents. In March 2010, the California Resources Agency adopted amendments to the state CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. Specifically, Section 15183.5(b)(1)A-G of Title 14 of the California Code of Regulations was amended to state that a GHG Reduction Plan, or Climate Action Plan, may be used...
for tiering and streamlining the analysis of GHG emissions in subsequent CEQA project evaluations provided that the CAP does the following:

- Quantifies GHG emissions, both existing and projected over a specific period of time, resulting from activities within a defined geographical area
- Establishes a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable
- Identifies and analyzes the GHGs emissions resulting from specific actions or categories of actions anticipated within the geographic area
- Specifies measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level
- Establishes a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels
- Is adopted in a public process following environmental review

**Senate Bill 375**

SB 375, signed in August 2008, enhances the state’s ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles for 2020 and 2035. In addition, SB 375 directs each of the state’s 18 major Metropolitan Planning Organizations (MPO) to prepare a “sustainable communities strategy” (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On September 23, 2010, CARB adopted final regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. SCAG was assigned targets of an 8 percent reduction in GHGs from transportation sources by 2020 and a 13 percent reduction in GHGs from transportation sources by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

**Senate Bill 2X**

In April 2011, the governor signed SB 2X requiring California to generate 33 percent of its electricity from renewable energy by 2020. SB 350, the Clean Energy and Pollution Reduction Act of 2015, was approved in October 2015. SB 350 has two objectives: to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by 2030 and to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

**Executive Order B-30-15**

EO B-30-15 (April 2015) established a statewide mid-term GHG reduction target of 40 percent below 1990 levels by 2030. Targets set beyond 2020 provide market certainty to foster investment and growth in industries like clean energy.
**Senate Bill 32**

On September 8, 2016, the Governor signed SB 32 into law, extending AB 32 by requiring the state to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies and regulations, such as SB 350 and SB 1383 (see below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with a statewide per capita goal of six MT CO₂e by 2030 and two MT CO₂e by 2050 [CARB 2017c]). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the state.

**SB 350**

Adopted on October 7, 2015, SB 350 supports the reduction of GHG emissions from the electricity sector through a number of measures, including requiring electricity providers to achieve a 50 percent renewables portfolio standard by 2030, a cumulative doubling of statewide energy efficiency savings in electricity and natural gas by retail customers by 2030.

**SB 1383**

Adopted in September 2016, SB 1383 requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. The bill requires the strategy to achieve the following reduction targets by 2030:

- Methane – 40 percent below 2013 levels
- Hydrofluorocarbons – 40 percent below 2013 levels
- Anthropogenic black carbon – 50 percent below 2013 levels

The bill also requires the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with the State board, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

For more information on the Senate and Assembly Bills, Executive Orders, and reports discussed above, and to view reports and research referenced above, please refer to the following websites: [www.climatechange.ca.gov](http://www.climatechange.ca.gov) and [www.CARB.ca.gov/cc/cc.htm](http://www.CARB.ca.gov/cc/cc.htm).

**California Environmental Quality Act**

Pursuant to the requirements of SB 97, the California Resources Agency adopted amendments to the *CEQA Guidelines* for the feasible mitigation of GHG emissions and analysis of the effects of GHG emissions. The adopted *CEQA Guidelines* provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.
b. Local Regulations

In 2013, the City of Alhambra adopted the EECAP, which includes goals, policies, and implementation programs to reduce the City’s GHG emissions. The EECAP provides GHG emission inventories for 2005 and 2010, and sets a goal to reduce 2005 baseline GHG emissions by 15 percent by 2020, consistent with AB 32 (Alhambra 2013). With implementation of the EECAP, the City is projected to meet this goal and reduce 2020 emissions to 430,690 MT CO₂e.

Methodology and Significance Thresholds

Based on Appendix G of the state CEQA Guidelines, impacts related to GHG emissions from the Plan would be significant if the project would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases

The vast majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project’s contribution towards an impact would be cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

For future projects, the significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds, or consistency with a regional GHG reduction plan (such as a Climate Action Plan). However, the South Coast Air Quality Management District (SCAQMD) does not have adopted GHG emissions thresholds, and the City’s adopted EECAP, which considers emissions through 2020, does not take into consideration the 2030 statewide target established in SB 32. Therefore, the statewide per capita goals set in the 2017 Scoping Plan of six MT CO₂e per service population by 2030 and two MT CO₂e per service population by 2050 were used to derive the significance threshold for this analysis (CARB 2017c). Assuming a linear trajectory, an intermediary threshold of four MT CO₂e per service population by 2040 would be consistent with statewide targets for 2030 and 2050 and is used as the significance threshold for this analysis.

Per-capita community emissions are generally calculated by dividing total community emissions by the service population, which in this case, includes employees and residents of Alhambra.

Alhambra’s 2040 With Project community emissions were calculated by adding project emissions to the 2020 projected emissions (taken from the EECAP) of 430,690 MT CO₂e. Project emissions were derived from the land use changes facilitated by the Plan (as provided in the Traffic Impact Analysis [KOA Corporation 2017]), which are summarized in Table 12, and quantified using CalEEMod, as described below. The 2040 With Project emissions were then divided by the projected 2040 service population (residents [88,800] and employees [33,500]) to determine Alhambra’s per capita emissions in 2040.

Quantification of the project’s CO₂, CH₄, and N₂O emissions are provided to identify the magnitude of potential project effects. The analysis focuses on CO₂, CH₄, and N₂O because these make up 98.9 percent of all GHG emissions by volume (IPCC 2007) and are the GHG emissions that the project
would emit in the largest quantities. Fluorinated gases, such as HFCs, PFCs, and SF₆, are also considered for the analysis. Emissions of all GHGs are converted into their equivalent GWP in terms of CO₂ (CO₂e). Minimal amounts of other GHGs (such as chlorofluorocarbons [CFCs]) would be emitted; however, these other GHG emissions would not substantially add to the total calculated CO₂e amounts. Calculations are based on the methodologies discussed in the California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change white paper (CAPCOA 2008) and included the use of the California Climate Action Registry (CCAR) General Reporting Protocol (CCAR 2009).

### Table 12 Land Use Changes Proposed in the General Plan Update

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Approximate Additional Units (compared to the existing General Plan)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single-Family Residential</td>
<td>360 dwelling units</td>
</tr>
<tr>
<td>Multi-Family Residential</td>
<td>2,040 dwelling units</td>
</tr>
<tr>
<td>Fast Food Restaurants</td>
<td>32,500 square feet</td>
</tr>
<tr>
<td>High-Turnover (sit-down) Restaurants</td>
<td>130,000 square feet</td>
</tr>
<tr>
<td>Retail Space</td>
<td>162,500 square feet</td>
</tr>
<tr>
<td>Industrial (Business Park) Space</td>
<td>400,000 square feet</td>
</tr>
<tr>
<td>Auto Dealership</td>
<td>183,000 square feet</td>
</tr>
<tr>
<td>Office Space</td>
<td>480,000 square feet</td>
</tr>
<tr>
<td>Hotels</td>
<td>250 rooms</td>
</tr>
</tbody>
</table>

SCAQMD has several rules applicable to development accommodated by the Plan, including Rule 445, which prohibits installation of permanent wood-burning devices into any new development, and Rule 1113, which limits the volatile organic compounds (VOC) content (50g/L) for architectural coatings, as well as others (SCAQMD 2013, 2016). It is assumed that the Plan will comply with all applicable SCAQMD rules.

The methodology utilized to determine the potential GHG impacts of the Plan calculates GHG emissions by quantifying the Plan’s facilitated land use changes and also takes into account regulatory measures that are intended to reduce GHG emissions. State and federal measures that are already built into the emissions model calculation include Title 24 Energy Standards, Pavley (Clean Car Standards) and Low-Carbon Fuel Standards.

GHG emissions associated with the Plan were calculated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 (Appendix D).

**Operational Emissions**

CalEEMod provides operational emissions of CO₂, N₂O, and CH₄. Emissions from energy use include electricity and natural gas use. The emissions factors for natural gas combustion are based on the EPA’s AP-42, (Compilation of Air Pollutant Emissions Factors) and CCAR. Electricity emissions are calculated by multiplying the energy use times the carbon intensity of the utility district per kilowatt hour. The default electricity intensity values in CalEEMod for water and wastewater are from the California Energy Commission’s 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern and Southern California (CAPCOA 2017).
For mobile sources, CO$_2$ and CH$_4$ emissions were quantified in CalEEMod. Because CalEEMod does not calculate N$_2$O emissions from mobile sources, N$_2$O emissions were quantified using the CCAR General Reporting Protocol (CCAR 2009) direct emissions factors for mobile combustion (Appendix D). The estimate of total daily trips associated with land use changes facilitated by the Plan, as described in the Traffic Impact Analysis for the Alhambra General Plan EIR Alhambra, CA prepared by KOA Corporation (2017) (Appendix F). The baseline used in the analysis includes the estimated 2020 forecast in the Alhambra EECAP (for a total of 538,770 MT CO$_2$e). Construction vehicle-related emissions are calculated and included under the construction-related emissions. Emission rates for N$_2$O emissions were based on the vehicle mix output generated by CalEEMod and the emission factors found in the CCAR General Reporting Protocol.

Construction Emissions

Although construction activity is addressed in this analysis, CAPCOA does not discuss whether any of the suggested threshold approaches adequately address impacts from temporary construction activity. As stated in the CEQA and Climate Change white paper, “more study is needed to make this assessment or to develop separate thresholds for construction activity” (CAPCOA 2008). Nevertheless, air districts such as the SCAQMD (SCAQMD 2008) have recommended amortizing construction-related emissions over a 30-year period in conjunction with the proposed project’s operational emissions.

Construction of the Plan would generate temporary GHG emissions primarily as a result of operation of on-site construction equipment, as well as from vehicles transporting construction workers to and from the project site and heavy trucks to export earth materials off site. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. CalEEMod provides an estimate of emissions associated with the construction period, based on parameters such as the duration of construction activity, area of disturbance, and anticipated equipment use during construction.

Project and Cumulative Impacts

<table>
<thead>
<tr>
<th>Threshold 1:</th>
<th>Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact GHG-1 :</td>
<td><strong>DEVELOPMENT FACILITATED BY THE PLAN WOULD GENERATE APPROXIMATELY 4.0 MT CO$_2$e OF GHG EMISSIONS PER CAPITA BY THE HORIZON YEAR OF 2040, WHICH DOES NOT EXCEED THE 4.0 MT CO$_2$e PER-CAPITA THRESHOLD CONSISTENT WITH STATEWIDE TARGETS. IN ADDITION, POLICIES CONTAINED IN THE PLAN TO PROMOTE TRANSIT-ORIENTED INFILL DEVELOPMENT AND PROVIDE INCENTIVES FOR HIGH-PERFORMANCE BUILDINGS AND INFRASTRUCTURE WOULD REDUCE OVERALL PER CAPITA GHG EMISSIONS WITHIN ALHAMBRA. IMPACTS WOULD BE LESS THAN SIGNIFICANT.</strong></td>
</tr>
</tbody>
</table>

Development facilitated by the Plan would generate GHG emissions through electricity and natural gas consumption, water use, and waste generation. The Plan could facilitate minor increases in development intensification along certain commercial corridors, as shown on the Vision Plan (Figure 3) and summarized in Table 12 above. The focus, though, is on walkable mixed-use developments to connect neighborhoods and reduce vehicle use in these corridors, while maintaining the City’s other established neighborhoods. Vehicle trips associated with the Plan are based on the trip generation numbers provided in the Traffic Impact Analysis (KOA Corporation 2017, Appendix F). GHG emissions associated with development facilitated by the Plan are summarized in Table 13.
### Table 13  Estimated GHG Emissions Associated with Development Facilitated by the General Plan Update

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Emissions (MT CO₂e)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Construction</strong></td>
<td></td>
</tr>
<tr>
<td>Construction Emissions</td>
<td>63,197.0</td>
</tr>
<tr>
<td>Amortized over 30 years</td>
<td>2,106.6</td>
</tr>
<tr>
<td>**Operational (excluding mobile)**¹</td>
<td></td>
</tr>
<tr>
<td>Area</td>
<td>534.2/year</td>
</tr>
<tr>
<td>Energy</td>
<td>18,288.2/year</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>3,005.8/year</td>
</tr>
<tr>
<td>Water</td>
<td>2,949.0/year</td>
</tr>
<tr>
<td><strong>Mobile</strong></td>
<td></td>
</tr>
<tr>
<td>CH₄ and CO₂</td>
<td>33,924.5</td>
</tr>
<tr>
<td>N₂O</td>
<td>1,842.5</td>
</tr>
<tr>
<td><strong>Total Emissions from Forecast Growth</strong></td>
<td>60,845.2</td>
</tr>
<tr>
<td>Alhambra EECAP 2020 Estimate (i.e., baseline)²</td>
<td>430,690.0</td>
</tr>
<tr>
<td><strong>Total 2040 Emissions (2020 Community Emissions + Emissions from Forecast Growth)</strong></td>
<td>493,337.7</td>
</tr>
</tbody>
</table>

**Citywide Per-Capita Emissions (Total 2040 emissions divided by service population of 122,300)**

| Per-Capita Significance Threshold for 2040 | 4.0 MT CO₂e |

**Project Exceeds Threshold?**

| No |


² The EECAP 2020 estimated emissions are used as a conservative baseline for analysis, as it calculates population and associated emissions to the year 2020, rather than the existing 2018 population and associated emissions (which would be lower).

See Appendix D for calculations.

Development facilitated by the Plan, added to the existing EECAP estimate for the year 2020, is estimated to result in 2040 emissions of approximately 493,337.7 MT CO₂e, as shown in Table 13. This total, divided by the estimated service population for the year 2040 (122,300 persons) would equate to an estimated 4 MT CO₂e per capita. This is in line with the 2040 statewide per-capita target of 4 MT CO₂e, which is consistent with the trajectory set by statewide per capita targets for 2030 (6 MT CO₂e) and 2050 (2 MT CO₂e). In addition, the Plan includes various goals and policies to directly and indirectly reduce per-capita GHG emissions in Alhambra. These policies are intended to increase the use of alternative transportation, shorten vehicle trips throughout the City, and improve efficiency (e.g., water conservation), causing a decrease in VMT and energy use and, consequently, a decrease in GHG emissions.

The Resources, Land Use/Community Design, and Quality of Life chapters of the Plan include the following goals and policies specifically intended to reduce GHG emissions, directly or indirectly, by increasing the use of alternative transportation and energy use in Alhambra:

**Policy R-1B**

Encourage water conservation and, when feasible, use recycled water in residential, commercial, industrial, public, and other developments

**Policy R-1C**

Efficiently manage water demands and efficiently use urban water supplies

**Policy R-3B**

Encourage the use of energy-saving designs, systems, and innovations in public and private building construction.
Policy R-3C  Promote using renewable energy, such as solar panels, throughout the City.

Policy R-5A  Facilitate compact development patterns that minimize motor vehicle trips and VMT while maintaining community character.

Policy R-5B  Collaborate with local transit agencies to develop programs that promote mass transit ridership.

Policy R-5C  Encourage the use of green building technology for building retrofits and pursue LEED-certification for new development.

Policy R-5D  Incorporate GHG reduction strategies into urban design and planning.

Policy LU-6A  Maintain a bustling urban environment with walkable streets that will allow pedestrians to feel comfortable and welcome.

Policy LU-6B  Enhance streetscapes and building elements to promote pedestrian activity by providing well-articulated building facades with quality building materials and workmanship, and featuring high-quality street furnishings and design.

Policy LU-6D  Improve the frontage zone of buildings as extensions of the building by enhancing entryways and doors, incorporating sidewalk cafes, and enhancing the space adjacent to the building as part of the pedestrian experience.

Policy LU-8A  Continue to implement the parkway tree planting plan to promote pedestrian activity by establishing well-designed streetscapes, active ground floor uses, and tree-canopied sidewalks that are unique to the neighborhood.

Policy LU-8E  Investigate the potential for new parks, including in the I-710 right-of-way and an east-west park along the Union Pacific railroad. For more details, see the Quality of Life chapter.

Policy M-1B  At major intersections where two major arterials intersect (such as along Fremont, Valley, Mission, and Garfield), peak hour LOS E or F may be acceptable. In these locations, balance the efficiency and convenience of vehicular operations with other General Plan goals and policies.

Policy M-1C  Plan and maintain the City’s transportation facilities in a way that provides adequate and safe access for all users, including pedestrians, bicyclists, and motorists of all ages and abilities.

Goal M-2  A circulation system that accommodates and encourages the use of alternative modes of transportation in a way that is safe, pleasant, and attractive for all users, including pedestrians, bicyclists, and transit riders.

Policy M-2A  Ensure that new development accommodates, and does not have a negative impact on, alternative transportation.

Policy M-2B  Improve transportation infrastructure and services in a way that will increase the utility and attractiveness of alternative modes of transportation.

Policy M-2C  Improve connectivity for alternative transportation modes throughout and beyond the City.

Policy M-2D  Create transit stop amenity and access improvements at key intersections on Atlantic Boulevard and Valley Boulevard. The intersections of Atlantic/Huntington-Garfield, Atlantic/Main, and Atlantic/Valley would be the
first priority, and the intersections of Fremont/Valley and Garfield/Valley would be the second priority.

Policy M-2E Investigate and where feasible implement first-mile/last-mile supportive measures to encourage and facilitate the use of transit.

Policy M-2F As feasible, implement the improvements shown on the bikeways map on page 38. The bikeway system should connect to the regional system and may need to be adjusted over time as conditions change. The bike network will include, as appropriate, enhancements to bicyclist safety and bike parking.

Policy M-3A Maintain parking standards that meet demand, but do not unnecessarily encourage use of the drive-alone automobile.

Policy M-4A As feasible in appropriate locations, retrofit streets to better accommodate all users.

The City’s Housing Element also includes the following policies that would, directly or indirectly, reduce GHG emissions by encouraging infill and mixed-use housing development in Alhambra.

Policy 3.2 Continue to provide opportunities for infill housing development in the Valley Boulevard Corridor Specific Plan Area and Central Business District Area.

Policy 3.3 Promote mixed-use development where housing is located adjacent to jobs, shopping, services, schools, transportation corridors, and leisure opportunities.

These policies, which promote mixed-use development, an enhanced pedestrian and bicycle network, improved access to and quality of public transportation, and infill and mixed-use housing, would encourage the use of alternative transportation and discourage vehicle trips. Because the Plan would encourage infill development and promote the establishment and use of alternative transportation such as walking, bicycling, and public transit, it would contribute to long-term reductions in per capita GHG emissions consistent with SCAG’s 2016-2040 RTP/SCS (see Impact GHG-2). Impacts would be less than significant.

Mitigation Measures

The Plan would result in per capita emissions consistent with statewide targets and includes policies to further reduce GHG emissions. Mitigation measures are not required.

Threshold 2: Would the proposed project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-2: The Plan would be consistent with the major initiatives contained in SCAG’s 2016-2040 RTP/SCS to reduce GHG emissions per capita by eight percent by 2020, 18 percent by 2035, and 21 percent by 2040, all compared to 2005 levels. Additionally, the Plan would be consistent with the City’s EECAp, reducing baseline 2005 GHG emissions per capita by 15 percent by 2020. Impacts would be less than significant.

SB 375 requires CARB to set regional targets for GHG emissions from use of light duty vehicles associated with land use decisions. Metropolitan Planning Organizations (MPOs) must address their regional GHG reductions targets in an SCS as part of the MPO’s RTP. SCAG adopted an RTP/SCS for the planning period of 2016-2040 on April 7, 2016. The primary goal of SCAG’s RTP/SCS is to provide a vision for future growth in Southern California that will reduce per capita GHG emissions from
automobiles and light trucks. The SCAG target is to reduce emissions by 8 percent per capita by 2020, 18 percent per capita by 2035, and 21 percent per capita by 2040, relative to 2005 levels.

In 2013, the City of Alhambra adopted the EECAP, which identifies the City’s long-term vision and commitment to achieve energy efficiency. The EECAP provides a baseline of GHG emissions for the years 2005 and 2010, with a goal to reach a 15 percent reduction in GHG emissions city-wide by 2020, complying with AB 32 (Alhambra 2013).

Table 14 summarizes policies contained in SCAG’s RTP/SCS and Alhambra’s EECAP that are applicable to the Plan and evaluates the Plan’s consistency with these policies. By promoting infill and mixed-use development, and alternative transportation modes (see discussion in Impact GHG-1), the Plan would be consistent with the major initiatives identified in the 2016-2040 RTP/SCS and the City’s EECAP to reduce GHG emissions (see Table 14). In addition, as discussed above, the Plan would result in per-capita GHG emissions consistent with statewide targets, including the 2030 target codified in SB 32. Because the Plan is consistent with adopted plans, policies, and regulations to reduce GHG emissions, impacts would be less than significant.

Table 14  2040 General Plan Consistency with 2016 RTP/SCS Land Use Policies and EECAP Implementation Policies

<table>
<thead>
<tr>
<th>Policy</th>
<th>Determination of Consistency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reflect the Changing Population and Demands</td>
<td>Consistent</td>
</tr>
<tr>
<td>This 2016 RTP/SCS reflects a continuation of the shift in demographics, which assumes a significant increase in small-lot, single-family and multifamily housing that will mostly occur in infill locations near bus corridors and other transit infrastructure.</td>
<td>Because the City is built out, very little undeveloped residential land remains in the City. Future housing growth will occur on existing infill sites or will be integrated with commercial uses. Policies in the City’s Housing Element (e.g., 3.2 and 3.4) call for identifying and providing opportunity to use infill lots for housing development and specifically identify opportunities in the Valley Boulevard Corridor Specific Plan Area and in the Central Business District Area.</td>
</tr>
<tr>
<td>Focus New Growth Around Transit</td>
<td>Consistent</td>
</tr>
<tr>
<td>The 2016 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region’s High Quality Transit Areas (HQTA).</td>
<td>The City of Alhambra is a SCAG HQTA eligible jurisdiction, and is within the SCAG HQTA boundary for 2040 south of Valley Boulevard (SCAG 2017a). The Plan has policies (e.g., Housing Element Policy 3.3) that promote mixed-use development, shopping, and services, near transportation corridors (e.g., Ramona Road, Atlantic Boulevard, and Mission Road).</td>
</tr>
<tr>
<td>Plan for Growth Around Livable Corridors</td>
<td>Consistent</td>
</tr>
<tr>
<td>The Livable Corridors strategy seeks to revitalize commercial strips through integrated transportation and land use planning that results in increased economic activity and improved mobility options.</td>
<td>The Plan contains goals and policies throughout to revitalize corridors throughout the City. Goals include maintenance and development of vital, attractive, and functional corridors and nodes as well as street designs that accommodate all users while activating the street along key corridors. For example, the Plan provides illustrative examples of street design improvements that could occur along Valley Boulevard and Main Street. The Plan also contains the goals and policies discussed in Impact GHG-1 to increase the use of alternative transportation in Alhambra (e.g., Policy M-2B).</td>
</tr>
<tr>
<td>Policy</td>
<td>Determination of Consistency</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Provide More Options for Short Trips</td>
<td>Consistent In addition to the goals and policies regarding corridor revitalization and street design, the Plan includes various goals and policies to encourage the use of alternative modes of transportation. These include investigating and where feasible implementing first-mile/last-mile supportive measures to encourage and facilitate the use of transit (Policy M-2E) and creating transit stop amenity and access improvements at key intersections (Policy M-2D). Consistent with the Complete Streets Act, Plan Goal M-1 is a circulation system that is efficient, safe, pleasant, and attractive for all users. Plan policies under Goal M-1 support this goal.</td>
</tr>
<tr>
<td>Support Local Sustainability Planning</td>
<td>Consistent The plan has Goals and Policies (e.g. Policies R-3B, R-3C, R-5A, R-5B, R-5C, R-5D, R-5E) to minimize Alhambra’s contribution to global climate change by reducing GHGs to the degree feasible by minimizing VMT, promoting mass transit ridership, encouraging use of green building technology, and incorporating GHG reduction strategies into urban design and planning.</td>
</tr>
<tr>
<td>Protect Natural and Farm Lands</td>
<td>Not Applicable Alhambra is an urbanized area and does not contain any natural or agriculture land.</td>
</tr>
<tr>
<td>2013 City of Alhambra EECAP</td>
<td></td>
</tr>
<tr>
<td>Achieve Maximum Energy Efficiency of Existing Housing</td>
<td>Consistent The plan has Goals and Policies (e.g. Goal R-3, Policies R-3A, R-3B, R-3C) to promote minimization of energy use by encouraging energy saving designs, systems, and innovations in public and private construction and use of solar panels.</td>
</tr>
<tr>
<td>Optimize Nonresidential Energy Use</td>
<td>Consistent The plan has Goals and Policies (e.g. Goal R-3, Policies R-3A, R-3B, R-3C) to promote minimization of energy use by encouraging energy saving designs, systems, and innovations in public and private construction and use of solar panels.</td>
</tr>
<tr>
<td>Integrate Energy-Efficient Features into New Buildings and Remodels that are Compatible with Exiting Community Character</td>
<td>Consistent In addition to Goal R-3 and Policies R-3A through R-3C, Policy R-5C encourages the use of green building technology for building retrofits and pursue LEED-certification for new development. Additionally, Policy R-5D incorporates GHG-reduction strategies into urban design and planning.</td>
</tr>
</tbody>
</table>
### Policy

<table>
<thead>
<tr>
<th><strong>Enhance the City’s Development Framework to Provide Ongoing Support for Energy Efficiency</strong></th>
<th><strong>Consistent</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Update the business permit process to include a checklist for consideration of energy efficiency programs, streamline and encourage energy-efficiency through development standards identify funding opportunities, and financing programs to support community upgrades and retrofits.</td>
<td>In addition to Goal R-3 and Policies R-3A through R-3C, policies R-5C and R-5D encourage the use of green building technology for building retrofits and pursue LEED-certification for new development. Additionally, Policy R-5D states to incorporate GHG reduction strategies into urban design and planning.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Align Planning Efforts with Energy Efficiency and Conservation</strong></th>
<th><strong>Consistent</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Upon initiation of the General Plan update, incorporate energy efficiency policies or create a stand-alone Energy Element for the City’s General Plan to serve as the policy document guiding long-term implementation of energy efficiency strategies.</td>
<td>The plan has Goals and Policies (e.g. Goal R-3 and R-5, in addition to Policies R-3A through R-3C, and R-5A through R-5E) to minimize Alhambra’s contribution to global climate change by reducing GHGs to the degree feasible by minimizing VMT, promoting mass transit ridership, encourage use of green building technology, and incorporation of GHG reduction strategies into urban design and planning.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Maximize the Use of Shading and Cooling</strong></th>
<th><strong>Consistent</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Expand the City’s urban tree forest through increased tree plantings on public rights-of-way, use cool roofs and surfaces to reduce electricity use</td>
<td>Goal R-2 and Policy R-2A addresses the conservation and enhancement of open spaces, greenbelts, and natural areas and to preserve, maintain, and expand the number of trees in the urban forest. Also, Policy R-5C is to encourage the use of green building technology for building retrofits and pursue LEED-certification for new development.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Achieve the 2020 Water Targets Set in the 2010 Urban Water Management Plan</strong></th>
<th><strong>Consistent</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Implementation of the water demand measures as identified in the 2010 Urban Water Management Plan, including implementation of water-efficient landscape ordinance and water waste prohibition efforts; assist with water fixture replacement measures; and assist with outreach programs.</td>
<td>Goal R-1 and Policies R-1A through R-1E are related to water resources in the City. Specifically, they promote the maintenance of water supplies, encourage conservation, and call on the City to focus on further development and implementation of water conservation programs.</td>
</tr>
</tbody>
</table>

### Mitigation Measures

The Plan would not conflict with applicable plans, policies, or regulations aimed at reducing GHG emissions. Mitigation measures are not required.
4.6 Hazards and Hazardous Materials

This section analyzes impacts associated with exposure to hazards and hazardous materials. It addresses impacts relating to hazardous materials use, transportation, and development on contaminated sites. Impacts associated with the risk of exposure to wildland fires are also addressed.

4.6.1 Setting

a. Definitions

The United States Environmental Protection Agency (USEPA) defines hazardous waste as a substance that (1) may cause or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating reversible illness and (2) poses a substantial present or potential future hazard to human health or the environment when it is improperly treated, stored, transported, disposed of, or otherwise managed. Hazardous waste is also defined as ignitable, corrosive, explosive, or reactive (Federal Code of Regulations—FCR-Title 40: Protection of the Environment, Part 261). The USEPA has developed a list of specific types of hazardous waste that are in the forms of solids, semi-solids, liquids, and gases. Producers of such waste include private businesses and federal, state, and local government agencies.

A material may also be classified as a hazardous material if it contains defined amounts of toxic chemicals. The USEPA regulates the production and distribution of commercial and industrial chemicals to protect human health and the environment. The USEPA also prepares and distributes information to further the public’s knowledge about these chemicals and their effects, and provides guidance to manufacturers in pollution prevention measures, such as more efficient manufacturing processes and recycling used materials.

Hazard Versus Risk

Workers and the general public health are potentially at risk whenever hazardous materials have been used or where there could be an exposure to such materials. Ecological communities, such as avian and terrestrial habitats and the aquatic environment, may also be at risk, depending on the type of populations and locations relative to potential exposure sources. Inherent in the setting and analyses presented in this section are the concepts of the “hazard” of these materials and the “risk” they pose to human health and the ecological environment.

Exposure to some chemical substances may harm internal organs or systems in the human body, ranging from temporary effects to permanent disability or death. Aquatic, terrestrial, or avian species may also be similarly adversely affected. Hazardous materials that result in adverse effects are generally considered “toxic.” However, other chemical materials may be corrosive, or react with other substances to form other hazardous materials, but they are not considered toxic because organs or systems are not affected. Because toxic materials can result in adverse health effects, they are considered hazardous materials, but not all hazardous materials are necessarily “toxic.” For purposes of the information and analyses presented in this section, the terms hazardous substances and hazardous materials are used interchangeably and include materials that are considered toxic.

The risk to human health and the ecological environment is determined by the probability of exposure to a hazardous material and the severity of harm such exposure would pose. That is to say,
the likelihood and means of exposure, in addition to the inherent toxicity of a material, are used to
determine the degree of risk to human health or the ecosystem. For example, a high probability of
exposure to a low-toxicity chemical would not necessarily pose an unacceptable human health or
ecological risk, whereas a low probability of exposure to a very high-toxicity chemical might. Various
regulatory agencies, such as the USEPA, California Environmental Protection Agency (CalEPA), State
Water Resources Control Board (SWRCB), California Department of Toxic Substances Control (DTSC),
and (Cal/OSHA) and federal Occupational Safety and Health Administrations (OSHA) are responsible
for developing and/or enforcing risk-based standards to protect the public and the environment.

b. Potential Hazardous Materials

Hazardous materials in the City of Alhambra are routinely used, stored, and transported in
commercial/retail businesses as well as in educational facilities, hospitals, and households.
Hazardous materials users and waste generators in the City include businesses, public and private
institutions, and households. Federal, state, and local agency databases maintain comprehensive
information on the locations of facilities using large quantities of hazardous materials, as well as
facilities generating hazardous waste. Some of these facilities use certain classes of hazardous
materials that require accidental release scenario modeling and risk management plans to protect
surrounding land uses.

The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) are
the enforcement agencies for hazardous materials transportation regulations. Transporters of
hazardous materials and waste are responsible for complying with all applicable packaging, labeling,
and shipping regulations. The Office of Emergency Services (OES) also provides emergency response
services involving hazardous materials incidents. Both federal and state governments require all
businesses that handle more than a specified amount of hazardous materials to submit a business
plan to a regulating agency.

Construction Materials

Asbestos

Asbestos is a naturally occurring fibrous mineral found in certain types of rock formations. Asbestos
is commonly mixed during processing with a material that binds fibers together so that it can be
used in different projects. Asbestos became popular due to the fact that it is durable, fire retardant,
resists corrosion, and is a good insulator. Asbestos becomes a problem when it is damaged,
disturbed, or deteriorates over time, and the material releases fibers into the air. Asbestos fibers
can cause serious health problems if inhaled.

According to the California Code of Regulations (CCR), Title 8, Section 1529, Asbestos, presumed
asbestos-containing material means “thermal system insulation and surfacing material found in
buildings constructed no later than 1980.” However, the designation of a material as presumed
asbestos-containing material may be rebutted pursuant to subsection (k)(5) of Title 8, Section 1529.
Because many structures in the City were built prior to 1980, asbestos may have been used in the
building materials for many local structures.

Lead

Lead is a highly toxic metal that was used for many years in consumer products. Because of its toxic
properties, lead is regulated as a hazardous material. Excessive exposure to lead can result in the
accumulation of lead in the blood, soft tissues, and bones. Children are particularly susceptible to
potential lead-related health problems because it is easily absorbed into developing systems and organs.

Lead is one of the most common hazards that humans are exposed to in their daily lives and may be present in hazardous concentrations in food, water, and air. Sources of lead include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, urban dust, and secondary lead smelters. Lead is no longer permitted for gasoline. Lead poisoning is the leading environmentally induced illness in children and poses a potential public health risk. In 1978, the federal government required the reduction of lead in house paint to less than 0.06 percent (600 parts per million), but houses in Alhambra built prior to this period may contain lead-based paint at levels in excess of this limit. Persons who own or perform repairs on a structure built before 1978, according to the County of Los Angeles Department of Public Health, are required to take the following actions (Los Angeles County 2017):

- Test painted surfaces for lead-based paint prior to beginning work, or assume that the surfaces contain lead-based paint and use lead-safe work practices
- Do not use a belt-sander, propane torch, high temperature heat gun, dry scraper, or dry sandpaper to remove lead-based paint
- Maintain painted surfaces in good repair
- Check impact or friction surfaces (windows and doors) for dust or deterioration
- Landlords must disclose known information on lead-based paint and lead-based paint hazards before leases take effect
- Sellers must disclose known information on lead-based paint and lead-based paint hazards before selling the property
- Renovators disturbing painted surfaces must give out the USEPA’s *Renovate Right* pamphlet

Contractors that disturb lead-based paint in homes built before 1978 must be certified and follow specific work practices to prevent lead contamination pursuant to 40 CFR 745, Subpart E.

**Household Hazardous Waste**

The USEPA defines household hazardous waste as “leftover products such as paints, cleaners, oils, batteries, and pesticides that contain potentially hazardous ingredients that could be corrosive, toxic, ignitable, or reactive.” Methods of improper disposal of household hazardous waste commonly include pouring them down the drain, on the ground, into storm sewers, or in some cases putting them out with the trash. Though the dangers of such disposal methods might not be immediately obvious, improper disposal of these forms of waste can pollute the environment and pose a threat to human health.

Los Angeles County provides residents a cost-free way to dispose of unwanted household chemicals. Six Household Hazardous Waste (HHW) collection centers are located in Los Angeles County: Gaffey Street S.A.F.E. Center in San Pedro, Glendale S.A.F.E. Center in Glendale; Hyperion S.A.F.E. Center in Playa del Rey, Washington Boulevard S.A.F.E. Center in Boyle Heights, Randall Street S.A.F.E. Center in Sun Valley, and UCLA S.A.F.E. Center in West Los Angeles. In addition, many one-day HHW collection events are provided in different cities. The dates, times, and locations of the one-day events are posted on the Los Angeles County Sanitation District’s website.
Radon Gas

Radon is a cancer-causing natural radioactive gas that is invisible, odorless, and tasteless. Radon forms from the radioactive decay of small amounts of uranium naturally present in rocks and soil. It can affect indoor air quality, particularly in mountainous areas. Radon gas from natural sources can accumulate in buildings and is a leading cause of non-smoking lung cancer deaths. The California Geological Survey (CGS) has developed a radon potential zone map for southern Los Angeles County. The map in Figure 27 is based on the relative radon potentials of different geologic units (CGS 2005). It shows that areas of moderate radon potential (above 4.0 picocuries per liter (pCi/L)) exist in the northwest and southwest parts of the Plan Area, generally corresponding to areas in or near hillier parts of the City underlain by soils that are rockier and less alluvial than in the rest of the Plan Area.

Geologic unit radon potentials have been developed using short-term indoor radon measurement data, provided by the Department of Health Services Radon Program and airborne radiometric data from the National Uranium Resource Evaluation Project conducted in the 1970s and early 1980s. The Department of Health Services indoor radon data for southern Los Angeles County ranges from less than 0.3 pCi/L to 159.6 pCi/L. The radon level at which the USEPA recommends considering remedial actions for radon reduction in residences is 4.0 pCi/L. Alhambra is reported to have a low potential for radon levels to exceed 4.0 pCi/L (CGS 2005).

Existing Hazardous Materials Sites

A database search conducted in November 2017 through the DTSC EnviroStor Hazardous Waste and Substances Site List website (DTSC 2017) found one site in Alhambra either containing or potentially containing hazardous materials contamination. This site is the San Gabriel Valley Superfund Site Area 3, which as discussed under the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) section below, is a 19-square mile area of contaminated groundwater beneath the cities of Alhambra, Rosemead, San Gabriel, San Marino, South Pasadena, and Temple City (USEPA 2017b). Two locations in Alhambra are listed by the USEPA under the Superfund Amendments and Reauthorization Act (SARA), Title III, as shown in Table 15. However, only one appears on the National Priority List. SARA added minimum cleanup requirements in Section 121 of CERCLIS, while SARA Title III involves requirements for business inventories and emergency response planning.

With respect to investigation and cleanup of known contaminated sites, the DTSC and RWQCB are the two primary state agencies responsible for issues pertaining to hazardous materials release sites. The DTSC has developed standards for the investigation of sites where hazardous materials contamination has been identified or could exist based on current or past uses. The standards identify approaches to determine if a release of hazardous waste/substances exists at a site and delineate the general extent of contamination, estimate the potential threat to public health and/or the environment from the release and provide an indicator of relative risk, determine if an expedited response action is required to reduce an existing or potential threat, and complete preliminary project scoping activities to determine data gaps and identify possible remedial action strategies to form the basis for development of a site strategy.

Figure 28 illustrates all contaminated and potentially contaminated sites contained in the DTSC’s EnviroStor database, CERCLIS, and the California Water Resources Control Board’s (CA SWRCB) GeoTracker database. The SWRCB GeoTracker database contains the most with 269 contaminated or potentially contaminated sites, 71 of which are underground storage tanks (UST) (SWRCB 2017).
Figure 27 Radon Gas Potential for Alhambra
Figure 28 Contaminated Sites in Alhambra
Comprehensive Environmental Response, Compensation, and Liability Information System

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) was developed to protect water, air, and land resources from risks created by past chemical disposal practices. This act is also referred to as the Superfund Act, and the sites listed under it are referred to as Superfund sites. Under CERCLA, the USEPA maintains Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS), which lists all contaminated sites in the U.S. that have in the past undergone or are currently undergoing clean-up activities. CERCLIS contains information on current hazardous waste sites, potential hazardous waste sites, and remedial activities. This includes sites that are on the National Priorities List (NPL) or being considered for the NPL. The NPL is the list of sites of national priority among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories. The NPL is intended primarily to guide the USEPA in determining which sites warrant further investigation (USEPA 2017a). There are two CERCLIS sites in the City, listed in Table 15, However, only one, the San Gabriel Valley Superfund Site (Area 3), is listed under the NPL. The San Gabriel Valley Superfund Site (Area 3) is a 19-square mile area of contaminated groundwater and is one of four Superfund sites in the 170-square mile San Gabriel Valley. The USEPA is currently working on the groundwater and soil cleanup plan for the site (USEPA 2017b).

Table 15  CERCLIS Sites in the Alhambra Area

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Site Location</th>
<th>EPA ID</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>A-American Environmental</td>
<td>3033 W. Mission Rd.</td>
<td>CAN000905907</td>
<td>Not on NPL</td>
</tr>
<tr>
<td>San Gabriel Valley (Area 3)</td>
<td>Main St. &amp; Garfield Ave.</td>
<td>CAD980818579</td>
<td>Final NPL</td>
</tr>
</tbody>
</table>

Source: USEPA 2017b, 2018

Toxic Release Inventory

The Toxics Release Inventory (TRI) is an EPA database that contains information on toxic chemical releases and other waste management activities reported annually by certain industry groups, as well as federal facilities. TRI sites are known to release toxic chemicals into the air. The EPA monitors the emissions from these facilities to ensure that their annual limits are not exceeded. TRI reports provide accurate information about potentially hazardous chemicals and their uses to the public in an attempt to give communities more power to hold companies accountable for their actions and to make informed decisions about how such chemicals should be managed. As of 2015, the TRI has no listings for toxic releases in Alhambra (USEPA 2018).

Leaking Underground Storage Tanks

Leaking underground storage tanks (LUST) are one of the greatest environmental concerns of the past several decades. According to the SWRCB’s GeoTracker database, 269 contaminated sites, 71 of them UST, have been reported in the Alhambra area (SWRCB 2017). These sites are shown on Figure 28. The status of 204 of these sites is “completed-case closed”, which means that a closure letter or other formal closure decision document has been issued for the site. The other 65 cases are still open and in various stages of assessment, remediation, or monitoring (SWRCB 2017). The Los Angeles County Environmental Health Department provides oversight and conducts inspections of all underground tank removals and installation of new tanks. Contaminated sites in Alhambra are predominantly located along major industrial and commercial corridors (Figure 28).
**Plugged, Abandoned, and Unrecorded Wells**

An abandoned well is a well that has halted operation and is in the process of being plugged. Once plugged, the well is officially decommissioned. An orphaned well has no responsible party that authorities can mandate to properly abandon the well. Plugged, abandoned, and unrecorded wells can cause environmental damage by leaking pollutants into the atmosphere or water supplies. Important determinants of how much orphaned or abandoned wells impact the environment include the techniques used and precautions taken when first drilling the well, whether it is a gas well, oil well, or combined oil and gas well, and if and how the well was sealed. If wells are not properly sealed when orphaned or abandoned, oil and gas can contaminate groundwater. It is also possible for orphaned and abandoned wells to be significant emitters of methane into the atmosphere. Furthermore, brine present in wells dug into shale formations can contain some radioactive and toxic substances that contaminate groundwater if the well leaks. Plugging wells can reduce the risk of explosions and protect groundwater, but does not always prevent methane emissions. In the United States, it is possible for wells to have been orphaned or abandoned for over a century, and information about them, if it exists at all, can be difficult to locate.

According to the Well Finder search tool hosted by the California Department of Conservation’s Division of Oil, Gas, and Geothermal Resources (DOGGR), there are two plugged wells located within City limits and three plugged wells located south of the City’s southern border (Figure 29). All five wells within or near City limits produced both oil and gas.

**Hazardous Waste Generators**

Many types of businesses can be producers of hazardous waste. Small businesses such as dry cleaners, auto repair shops, medical facilities or hospitals, photo processing centers, and metal-plating shops are usually generators of small quantities of hazardous waste. Generally, small-quantity generators are facilities that produce between 100 and 1,000 kilograms (kg) of hazardous waste per month (approximately equivalent to between 220 and 2,200 pounds, or between 27 and 275 gallons). Larger businesses such as chemical manufacturers, large electroplating facilities, and petroleum refineries, can generate large quantities of hazardous waste. The USEPA defines a large-quantity generator as a facility that produces over 1,000 kg (2,200 pounds or about 275 gallons) of hazardous waste per month. Both small and large quantity generators are fully regulated under the Resources Conservation and Recovery Act of 1976 (RCRA). The goal of the RCRA is to assure adequate tracking of hazardous materials from generation to disposal. California Fire Code (CFC) articles 79, 80, et al., which augment the RCRA, are the primary regulatory guidelines used by cities to govern the storage and use of hazardous materials. The CFC also serves as the principal enforcement document from which corresponding violations are determined.

**c. Fire Hazards**

**Urban Fires**

Many factors contribute to an area being at risk of structural fires and local fire departments’ capabilities to control them, including the construction size and type, built-in protection, density of construction, street widths, and occupancy size. Many of the structures in the older portions of the City, some dating back to the 1930s, are susceptible to urban fires because they were built according to older building standards and fire codes, with no internal sprinklers and other fire safety systems in place, and made from non-fire-resistive construction materials. Additionally, daytime traffic congestion from commuter and other traffic may contribute to difficulty of ingress and egress.
Figure 29 Plugged Oil and Gas Wells in and within 1,000 feet of Alhambra
for emergency response vehicles in these areas. Geography and weather are also factors affecting fire safety in Alhambra. Alhambra frequently experiences hot, dry weather during summer and fall months, and the hilly terrain in the western and southwest portions of the City could cause flames to spread quickly. This is especially true during Santa Ana wind conditions, when hot, dry desert air can combine with high winds, increasing the possibility of quick-spreading fires.

Wildland Fires

The California Department of Forestry and Fire Protection (CAL FIRE) works in cooperation with OES, as well as neighboring state governments through a network of mutual aid agreements to fight wildland fires. CAL FIRE is the largest multipurpose fire protection agency in the United States, responsible for wildland fire protection of over 31 million acres of California’s privately owned watershed lands, as well as services in 150 counties, cities, and districts via contracts with local governments (CAL FIRE 2018). CAL FIRE responds to over 5,400 wildland fires each year and commands a force of approximately 5,324 full-time fire professionals, 1,783 seasonal personnel, and approximately 3,350 volunteers (CAL FIRE 2016). In addition to its nearly 1,000 fire engines, CAL FIRE maintains a significant fleet of aircraft that includes 22 air tankers, 17 air tactical planes, and 12 helicopters (CAL FIRE 2018).

Fire risk in southern California is determined by a number of factors, including drought, the availability and type of fuels, Santa Ana Winds, and development in the wildland-urban interface. The area is characterized by a Mediterranean climate of hot, dry summers and mild, wet winters. As with much of the western United States, the region has seen significantly below-average rainfall in recent years, leaving parched brush and trees extremely dry and fire prone.

Alhambra is not particularly susceptible to wildland fires because of the urbanized character of the City and its location in a fully urbanized region, leaving little to no property exposed to risk from wildland fires. There are a few open spaces inside the City limits, such as Almansor Park and Granada Park, which are the two largest open spaces in the City. However, these open spaces serve as recreation areas, are not densely vegetated, and do not pose a significant risk in terms of wildland fires.

d. Emergency Medical and Other Services

The Alhambra Fire Department (AFD) responds to all types of emergency situations involving fires, explosions, rescues, medical emergencies, hazardous conditions, natural disasters, and false alarms. The AFD also responds to nonemergency service calls and good intent calls. The AFD’s firefighters and paramedics are therefore trained and prepared to respond to a wide variety of situations. The AFD is also responsible for building and business inspections, site plan review, and construction inspections.

e. Emergency Response

The California Emergency Services Act provides the basic authority for conducting emergency operations following proclamations of emergencies by the Governor or other local authority. All local emergency plans are extensions of the California Emergency Plan. Alhambra is located in Region I, the Southern Administrative Region, of the six mutual aid regions that exist in California. Region I is divided into two regions for Law Enforcement Mutual Aid—Sub-Region I and Sub-Region IA. Alhambra is located in Sub-Region I.
In 1981, the City of Alhambra approved an Emergency Service and Civil Disaster Plan, consistent with local and state guidelines. The Plan establishes a basis for the coordination, management, and operation of critical resources and describes the civil government’s authority, responsibilities, and functions. During an emergency, the City will collaborate with local, state and federal law enforcement agencies, emergency health providers, the Alhambra Unified School District, the American Red Cross, private industry, and the faith-based community.

The City police and fire departments have also been active in the Federal Homeland Security Grant process. The Alhambra Police Department has received grant funds to procure a new mobile Law Enforcement Mutual Aid Command Center for major disasters in Alhambra and the surrounding region. The Fire Department has recently procured a new mobile Homeland Security-financed Emergency Preparedness Engine. The AFD offers seven steps to earthquake safety, what to do if an earthquake occurs, and what to do after an earthquake. The AFD also provides a Disaster Preparedness Guide on how to prepare for a potential emergency situation.

Additionally, Alhambra has established a Community Emergency Response Team (CERT). CERT is a group of citizens specially trained to provide immediate assistance in the event of an emergency until agencies are able to respond. The training program includes sessions on disaster preparedness, first aid, communications and good team work, fire safety, disaster medical operations, search and rescue, and more.

### Standardized Emergency Management System

The Standardized Emergency Management System (SEMS) Multi-Hazard Functional Plan (MHFP) addresses Alhambra’s planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The operational concepts reflected in the SEMS MHFP focus on potential large-scale disasters that can generate unique situations requiring unusual emergency responses. The intent of the SEMS law is to improve the coordination of state and local emergency response in California. It requires all jurisdictions in California to participate in the establishment of a standardized statewide emergency management system.

In an emergency, governmental response is an extension of responsibility and action, coupled with normal day-to-day activity. Normal governmental duties will be maintained with emergency operations carried out by those agencies assigned specific emergency functions. The SEMS has been adopted by the City of Alhambra for managing response to multi-agency and multi-jurisdiction emergencies and to facilitate communications and coordination between all levels of the system and among all responding agencies. Chapter 1 of Division 2 of Title 19 of the CCR establishes the standard response structure and basic protocols to be used in emergency response and recovery.

Fully activated, the SEMS consists of five levels:

- **Field Response.** Consists of emergency response personnel and resources, under the command of an appropriate authority, and carries out tactical decisions and activities in direct response to an incident or threat.

- **Local Government.** Includes cities, counties, and special districts. Local governments manage and coordinate the overall emergency response and recovery activities with their jurisdiction and are required to use SEMS when their emergency operations center is activated or a local emergency is proclaimed in order to be eligible for state funding of response-related personnel costs.
National Incident Management System (NIMS) Implementation

Presidential Directive HSPD 5 identifies steps for improved coordination in response to incidents and requires a National Response Plan and a National Incident Management System (NIMS). NIMS is a comprehensive, national approach to incident management developed to improve the coordination of federal, state and local emergency response nationwide. The State of California’s NIMS Advisory Committee issued “California Implementation Guidelines for the National Incident Management System” to assist local governments and other entities to incorporate NIMS into already existing programs, plans, training and exercises.

Mutual Aid Agreements

The foundation of California’s emergency planning and response is a statewide mutual aid system which is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555–8561) requires signatories to the agreement to prepare operational plans to use within their jurisdiction and outside their area. These plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all state agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

Section 8568 of the California Government Code, the “California Emergency Services Act,” states that “the State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof.” The Act provides the basic authority for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager. The provisions of the act are further reflected and expanded on by appropriate local emergency ordinances. The Act further describes the function and operations of government at all levels during extraordinary emergencies, including war (OES 2017). Therefore, local emergency plans are considered extensions of the California Emergency Plan.

As discussed, six mutual aid regions exist in the State of California, each region consisting of counties designated by the State Office of Emergency Services. Alhambra is within Region I, the Southern Administrative Region, which is further divided into two regions for Law Enforcement Mutual Aid – Sub-Region I and Sub-Region IA. Alhambra is located within Sub-Region I.
f. Regulatory Framework

Several federal agencies regulate hazardous materials. These include the USEPA, OSHA, and the United States Department of Transportation (US DOT).

Primary state agencies with jurisdiction over hazardous chemical materials management are the DTSC and RWQCB. Other state agencies involved in hazardous materials management are the Department of Industrial Relations (Cal/OSHA implementation), OES (California Accidental Release Prevention implementation), the California Department of Fish and Wildlife (CDFW), the California Air Resources Board (CARB), Caltrans, State Office of Environmental Health Hazard Assessment (Proposition 65 implementation), and the California Integrated Waste Management Board. The enforcement agencies for hazardous materials transportation regulations are the CHP and Caltrans. Hazardous materials and waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations.

California Environmental Protection Agency

CalEPA has broad jurisdiction over hazardous materials management in the state. Within CalEPA, the DTSC has primary regulatory responsibility for hazardous waste management and cleanup. Enforcement of regulations has been delegated to local jurisdictions that enter into agreements with DTSC for the generation, transport, and disposal of hazardous materials under the authority of the Hazardous Waste Control Act.

Along with the DTSC, the RWQCB is responsible for implementing regulations pertaining to management of soil and groundwater investigation and cleanup. RWQCB regulations are contained in Title 27 of the CCR. Additional state regulations applicable to hazardous materials are contained in Title 22 of the CCR. Title 26 of the CCR is a compilation of those sections or titles of the CCR that are applicable to hazardous materials.

Department of Toxic Substances Control

The DTSC regulates hazardous waste in California primarily under the authority of the federal RCRA and the California Health and Safety Code. Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. In addition, DTSC reviews and monitors legislation to ensure that the legislation reflects DTSC goals. From these laws, DTSC major program areas develop regulations and consistent program policies and procedures. The regulations spell out what those who handle hazardous waste must do to comply with the laws. Under RCRA, DTSC has the authority to implement permitting, inspection, compliance, and corrective action programs to ensure that people who manage hazardous waste follow state and federal requirements. As such, management of hazardous waste in the City is regulated by the DTSC to ensure compliance with state and federal requirements pertaining to hazardous waste.

California law provides the general framework for regulation of hazardous wastes by the Hazardous Waste Control Act, passed in 1972. DTSC is the state’s lead agency in implementing the Act. The Act provides for state regulation of existing hazardous waste facilities, which include “any structure, other appurtenances, and improvements on the land, used for treatment, transfer, storage, resource recovery, disposal, or recycling of hazardous wastes,” and requires permits for, and inspections of, facilities involved in generation and/or treatment, storage, and disposal of hazardous wastes.
California Division of Occupational Safety and Health

Cal/OSHA is responsible for developing and enforcing workplace safety standards and assuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA obligates many businesses to prepare Injury and Illness Prevention Plans and Chemical Hygiene Plans. The Hazard Communication Standard requires that workers be informed of the hazards associated with the materials they handle. For example, manufacturers are to appropriately label containers, Material Safety Data Sheets are to be available in the workplace, and employers are to properly train workers.

Construction Site Well Review Program

DOGGR oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells. The regulatory program emphasizes the wise development of oil, natural gas, and geothermal resources in the state through sound engineering practices that protect the environment, prevent pollution, and ensure public safety. DOGGR is charged with implementing Section 3208.1 of the Public Resources Code (PRC). As a result, DOGGR developed the Construction Site Well Review program to assist local permitting agencies in identifying and reviewing the status of oil or gas wells located near or beneath proposed structures. Before issuing building or grading permits, local permitting agencies review and implement DOGGR’s preconstruction well requirements.

The Construction Site Well Review Program provides important information on the current status of all known wells located on a development site property, and it provides other important information when development occurs near oil or gas wells. DOGGR provides this information in an advisory role, so that responsible decisions can be made by the property owner, developer, and local permitting agency when development occurs near oil or gas wells. In a June 27, 2017 comment letter on the notice of preparation (NOP) for the Plan (Appendix A), DOGGR stated that its records indicate that there are at least two plugged and abandoned wells in or near the Plan Area, and that individual well records are available on the DOGGR website or by making an appointment with the division’s Records Clerk. According to Section 3208.1 of the PRC, if any property owner, developer, or local permitting agency either fails to obtain an opinion from DOGGR, or fails to follow the advice of the division when development occurs near an oil or gas well, then the owner of the property on which the well is located may be responsible for abandonment costs should a future problem arise with the well.

In January 1996, CalEPA adopted regulations implementing a “Unified Hazardous Waste and Hazardous Materials Management Regulatory Program” (Unified Program). The six program elements of the Unified Program are hazardous waste generators and hazardous waste on-site treatment, UST, above-ground storage tanks, hazardous material release response plans and inventories, risk management and prevention program, and Uniform Fire Code hazardous materials management plans and inventories. The program is implemented at the local level by a local agency—the Certified Unified Program Agency (CUPA). The CUPA is responsible for consolidating the administration of the six program elements within its jurisdiction. The CUPA that has jurisdiction in the City of Alhambra is the LACoFD.

California’s Hazardous Materials Release Response Plans and Inventory Law, sometimes called the “Business Plan Act,” aims to minimize the potential for accidents involving hazardous materials and to facilitate an appropriate response to possible hazardous materials emergencies. The law requires businesses that use hazardous materials to provide inventories of those materials to designated
emergency response agencies, to illustrate on a diagram where the materials are stored on-site, to prepare an emergency response plan, and to train employees to use the materials safely.

**California Accidental Release Prevention Program**

The California Accidental Release Prevention Program (CalARP) (CCR Title 19, Division 2, Chapter 4.5) covers certain businesses that store or handle more than a certain volume of specific regulated substances at their facilities. The CalARP program regulations became effective on January 1, 1997, and include the provisions of the Federal Accidental Release Prevention program (Title 40, CFR Part 68) with certain additions specific to California pursuant to Article 2, Chapter 6.95, of the Health and Safety Code.

The list of regulated substances is found in Article 8, Section 2770.5 of the CalARP program regulations. Businesses that use a regulated substance above the noted threshold quantity must implement an accidental release prevention program, and some may be required to complete a Risk Management Plan (RMP). An RMP is a detailed engineering analysis of the potential accident factors present at a business and the mitigation measures that can be implemented to reduce this accident potential. The purpose of an RMP is to decrease the risk of an off-site release of a regulated substance that might harm the surrounding environment and community. An RMP includes the following components: safety information, hazard review, operating procedures, training, maintenance, compliance audits, and incident investigation. The RMP must consider the proximity to sensitive populations located in schools, residential areas, general acute care hospitals, long-term health care facilities, and child day-care facilities, and must also consider external events such as seismic activity.

**California Airport Land Use Compatibility Plan**

The ALUC provides for orderly growth of an airport and the area surrounding the airport within the jurisdiction of the Airport Land Use Commission (ALUC), excluding existing land uses. Its primary function is to safeguard the general welfare of the inhabitants within the vicinity of the airport and the public in general. Cities and/or counties have a responsibility to ensure the orderly development of the airports within their local jurisdiction and make sure all applicable planning documents and building regulations are consistent with the Airport Land Use Compatibility Plan (ALUCP). They also have the final decision on local land use issues and have the ability to overrule ALUC determinations, if they make specific findings that the action is consistent with Public Utilities Code (PUC) Section 21670 to promote “public health, safety, and welfare” (Caltrans 2013).

**Alhambra Municipal Code**

Chapter 2.20 (Emergency Organization and Functions) of the Alhambra Municipal Code establishes a Disaster Council whose responsibility is “to review and recommend for adoption by the City Council, emergency and mutual aid plans and agreements and such ordinances and resolutions and rules and regulations as are necessary to implement such plans and agreements and to advise the City Council in connection therewith.” The purpose is to provide for the preparation and carrying out of plans for the protection of persons and property in the City in an emergency, the direction of the emergency organization, and the coordination of the emergency functions of the City with all other public agencies, corporations, organizations, and affected private persons.
4.6.2 Impact Analysis

a. Methodology and Significance Thresholds

The analysis in this section focuses largely on the use, disposal, transport, or management of hazardous or potentially hazardous materials resulting from development or redevelopment envisioned under the Plan, as well as other concerns such as hazards introduced by aviation activities. Disposal options, the probability for risk of upset, and the severity of consequences to people or property associated with the increased use, handling, transport, and/or disposal of hazardous materials associated with implementation of the Plan are also analyzed. The risks from development in the identified focus areas relative to the location of known contaminated sites are analyzed. Construction impacts would generally result from demolition of existing (usually older) structures, as well as from disturbance of contaminated soils. Operational impacts would generally be a function of the types of uses proposed and the materials that operation of these uses entails.

The analysis assumes that any development under the Plan would comply with relevant federal and state laws and regulations, as well as the requirements of the Alhambra Municipal Code.

The following thresholds of significance are based on Appendix G to the State CEQA Guidelines. For purposes of this EIR, implementation of the Plan may have a significant adverse impact if it would do any of the following:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
2. 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
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school
4. 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 create a significant hazard to the public or the environment
5. 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, result in a safety hazard for people residing or working in the project area
6. For a project in the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area
7. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan
8. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands

As the City of Alhambra and the surround area is fully urbanized, the City is not particularly susceptible to risk from wildland fires. There are a few open spaces within the City limits, such as Almansor Park and Granada Park, which are the two largest open spaces in the City. However, these spaces serve as recreation areas, are not densely vegetated, and do not pose a significant risk in
terms of wildland fires. As such, Threshold 8 is not applicable to the Plan and has been omitted from the following analysis.

b. Project and Cumulative Impacts

<table>
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<tr>
<th>Threshold 1:</th>
<th>Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials</th>
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**Impact HAZ-1:** DEVELOPMENT FACILITATED BY THE PLAN COULD RESULT IN AN INCREASE IN THE OVERALL ROUTINE TRANSPORT, USE, STORAGE, AND DISPOSAL OF HAZARDOUS MATERIALS WITHIN THE CITY. HOWEVER, COMPLIANCE WITH APPLICABLE REGULATIONS RELATED TO THE HANDLING AND STORAGE OF HAZARDOUS MATERIALS WOULD MINIMIZE THE RISK OF PUBLIC EXPOSURE TO THESE SUBSTANCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

In an urbanized city such as Alhambra, residential and commercial or industrial uses reside relatively close to one another or often co-exist. Implementation of the Plan would facilitate new development, including conversion of uses and, in some locations, more intense use of land. Focus areas for new development do not reflect the majority of land area in Alhambra, since most of the City is composed of stable residential, commercial, and industrial areas that will not change substantially as the Plan is implemented over the next 20 years or more. Four focus areas (West Main Street, Valley Boulevard, Garfield Medical Office Corridor, and the Fremont and Mission Regional Commercial/Industrial Hubs) have been identified as having the highest potential for change over the planning period. These focus areas are discussed in Section 2.3.5, Key Updates.

The introduction of new mixed-use, commercial, and industrial uses in the City, predominantly within the focus areas, may result in an incremental increase in the use of hazardous materials and/or the generation of hazardous materials. While there is a possibility that new industrial uses within the focus areas could transport, use, store, or dispose of hazardous materials, most areas identified for mixed-use development under the Plan would involve commercial and retail uses and would not involve the transport, use, storage, or disposal of hazardous materials associated with industrial activities. However, future industrial development could result in closer proximity of residences to the routine handling, use, storage, disposal, or transport of hazardous materials. This is especially true in areas where new residential development could be introduced in areas in close proximity to existing and/or future industrial development.

Exposure of persons to hazardous materials could occur in the following ways: improper handling or use of hazardous materials or hazardous wastes during construction or operation of future developments, particularly by untrained personnel; transportation accident; environmentally unsound disposal methods; or fire, explosion or other emergencies. The types and amounts of hazardous materials would vary according to the nature of the activity. In some cases, it is the type of material that is potentially hazardous; in others, it is the amount of material that could present a hazard.

Although the overall quantity of hazardous materials and waste generated in the City could incrementally increase under the Plan, all new developments that handle or use hazardous materials would be required to comply with regulations, standards, and guidelines established by the USEPA, state, Los Angeles County, and City of Alhambra related to storage, use, and disposal of hazardous materials.

As mentioned in Section 4.6.1, Setting, both the federal and state governments require all businesses that handle more than a specified amount of hazardous materials to submit a business
plan to a regulating agency. Specifically, any new business that meets the specified criteria must submit a full hazardous materials disclosure report that includes an inventory of the hazardous materials generated, used, stored, handled, or emitted; and emergency response plans and procedures to be used in the event of a significant or threatened significant release of a hazardous material. The plan needs to identify the procedures to follow for immediate notification to all appropriate agencies and personnel in the event of a release, identification of local emergency medical assistance appropriate for potential accident scenarios, contact information for all company emergency coordinators of the business, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel. LACoFD, as the designated CUPA, conducts yearly inspections of all such businesses to confirm that their business plan is in order and up to date.

The Health and Safety Chapter of the Plan also includes a variety of policies to reduce the potential exposure of people and the environment to hazardous materials. For example, Policy HS-4A is to prevent and plan for response to hazardous materials releases; Policy HS-4B is to encourage and support enforcement of state and federal laws and regulations pertaining to the generation, use, handling, storage, and transport of hazardous materials; and Policy HS-4D is to coordinate as appropriate with the Department of Transportation and the California Highway Patrol to regulate the routing of vehicles carrying potentially hazardous materials along transportation corridors that reduce public exposure to risk. These and other Plan policies would minimize risks from routine use, transport, handling, storage, and disposal of hazardous materials. Oversight by the appropriate federal, state, and local agencies and compliance with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of public exposure to these substances. Therefore, this impact would be less than significant.

Mitigation Measures

No significant impact has been identified; therefore, mitigation is not required.

<table>
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<th>Threshold 2:</th>
<th>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</th>
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Impact HAZ-2: DEVELOPMENT FACILITATED BY THE PLAN COULD POTENTIALLY RESULT IN THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS. HOWEVER, COMPLIANCE WITH EXISTING REGULATIONS AND PLAN POLICIES WOULD MINIMIZE THE RISK OF EXPOSURE TO THESE SUBSTANCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Because implementation of the Plan would primarily result in urban infill and redevelopment and intensification of development in specific focus areas in the City, existing structures may need to be demolished prior to the construction of new buildings. Demolition of existing structures in the City could result in exposure of construction personnel and the public to hazardous substances such as asbestos or lead-based paints. Long-term risks to occupants of buildings could result from other contaminants released from the soil, such as radon gas. In addition, disturbance of plugged, abandoned, and unrecorded oil and gas wells could result in the release of hazardous materials into the environment. Lastly, the accidental spill or leakage of hazardous materials during transport, use, storage, or disposal could result in the exposure of construction personnel and the public to health or safety risks.
Exposure to hazardous materials during construction and operation of projects facilitated by the Plan could potentially occur through any of the following:

- Direct dermal contact with hazardous materials
- Incidental ingestion of hazardous materials (usually due to improper hygiene, when people fail to wash their hands before eating, drinking, or smoking)
- Inhalation of airborne dust released from dried hazardous materials, or other hazardous materials such as radon gas

**Lead and Asbestos**

Federal and state regulations govern the renovation and demolition of structures where materials containing lead and asbestos are present. These requirements include the South Coast Air Quality Management District (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 Title 8 of the CCR, Part 61, Subpart M of the Code of Federal Regulations (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 State Department of Health Services. In addition, Cal/OSHA has regulations concerning the use of hazardous materials, including requirements for safety training, availability of safety equipment, hazardous materials exposure warnings, and emergency action and fire prevention plan preparation. Cal/OSHA enforces the hazard communication program regulations, which include provisions for identifying and labeling hazardous materials, describing the hazards of chemicals, and documenting employee-training programs. All demolition that could result in the release of lead and/or asbestos must be conducted according to Cal/OSHA standards. Adherence to existing regulations that require appropriate testing and abatement actions for hazardous materials would minimize exposure to lead and asbestos during construction activities.

**Hazardous Materials Use**

Hazardous materials use may present a risk of accident. However, specific project-site activities would be required to comply with federal and state laws to eliminate or reduce the consequence of hazardous materials accidents. For example, employees who would work around hazardous materials would be required to wear appropriate protective equipment, and safety equipment is routinely available in all areas where hazardous materials are used.

The LACoFD Health Hazardous Materials Division personnel respond to hazardous materials incidents in Alhambra. Major hazardous materials accidents associated with retail-commercial uses are extremely infrequent, and additional emergency response capabilities are not anticipated to be necessary to respond to the potential incremental increase in the number of incidents that could result from implementation of the Plan. Further, adherence to applicable regulations as discussed above, under Section 4.6.1.f, Regulatory Framework, would reduce any potential consequences of a hazardous materials operational accident.

**Radon Gas**

Radon is a cancer-causing natural radioactive gas that is invisible, odorless, and tasteless. Radon forms from the radioactive decay of small amounts of uranium naturally present in the rocks and soil that affects indoor air quality. Radon gas from natural sources can accumulate in buildings and
reportedly is the second-most frequent cause of lung cancer, after cigarette smoking. Areas of moderate radon potential (above 4.0 pCi/L) exist in the northwest and southwest parts of the City, generally corresponding to areas in or near hillier parts of the City underlain by soils that are rockier and less alluvial than in the rest of the Plan Area, as shown in Figure 27. The potential for radon gas exposure could result in significant impacts to occupants of new development in these areas. For this reason, a radon gas survey should be performed to evaluate the potential for radon gas hazards prior to development of occupiable structures in these areas. The analysis should provide recommendations to prepare the site for development to avoid the hazards associated with radon gas. Typical measures to treat radon-emitting soils involve non-permeable barriers and proper ventilation.

The Health and Safety Chapter of the Plan includes the following policy and implementation action, which would reduce the potential for exposure to radon gas to a less than significant level.

**Policy HS-1A** Minimize the risk to life or limb, and property damage resulting from soil and related hazards

**Implementation Action HS-10** Require developers to submit to a radon gas survey to the City prior to development of any occupiable building in the boundaries of any area identified in the General Plan as having moderate potential for indoor radon levels above 4.0 pCi/L and if radon gas hazards are identified at the site, the radon gas survey shall provide recommendations to prepare the site for development to avoid these hazards, in accordance with EPA guidelines for minimizing impacts associated with radon gas exposure.

**Plugged, Abandoned, and Unrecorded Wells**

There are two known plugged wells in Alhambra and three known plugged wells located within 1,000 feet of the City's southern boundary (DOGGR 2018a). One of the two plugged wells located in the City is located near the intersection of East Mission Road and South Garfield Avenue, with an API well number of 03706338. The other plugged well in the City is located approximately 150 feet south of the Loma Vista Drive and La Crescenta Avenue intersection, with an API well number of 03721143. The other three plugged wells are located along the southern boundary of the City between Chandler Avenue and Westminster Avenue, ranging from 115 feet to 800 feet outside City limits (Figure 29).

If any wells, including any plugged, abandoned or unrecorded wells, are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, DOGGR’s district office may be contacted to obtain information on requirements and approval to perform remedial operations (personal communication via phone with John Geroch, Chief Deputy, DOGGR, July 17, 2017). The DOGGR encourages participating in the Well Review Program. In the case that the land owner, the developer, or the local permitting agency fails to either obtain an opinion from the DOGGR or fails to follow advice given by the DOGGR, then the owner may be responsible for all abandonment or reabandonment costs, pursuant to Public Resources Code (PRC) Chapter 1, Article 4, §3208 (DOGGR 2018b). The DOGGR’s Well Review Program Introduction, which provides instructions for participating in the program, is located on their website (DOGGR 2007). Furthermore, the Health and Safety Chapter of the Plan includes the following Implementation Action that would reduce the potential for and potential impacts from the uncovering of plugged, abandoned, and unrecorded wells to a less than significant level.
Implementation Action HS-11

Coordinate with project proponents and land owners to ensure participation in the Division of Oil, Gas and Geothermal Resources’ (DOGGR) Well Review Program and mitigate financial and environmental impacts from the abandonment or reabandonment of known wells in the City. Continue to maintain participation with the DOGGR’s Well Review Program to minimize the potential for unidentified well discovery during future development construction activities.

Hazardous Materials Storage

Hazardous materials are required to be stored in designated areas designed to prevent accidental release to the environment. California Building Code requirements prescribe safe accommodations for materials that present a moderate explosion hazard, high fire or physical hazard, or health hazards. Compliance with all applicable federal and state laws related to the storage of hazardous materials would be implemented to maximize containment (through safe handling and storage practices described above) and to provide for prompt and effective cleanup if an accidental release occurs.

Off-Site Transportation of Hazardous Materials

The US DOT Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials, as described in Title 49 of the Code of Federal Regulations, and implemented by Title 13 of the CCR.

The transportation of hazardous materials can result in accidental spills, leaks, toxic releases, fire, or explosion. It is possible that licensed vendors could bring some hazardous materials to and from new retail-commercial sites in the Plan Area as a result of projects facilitated by the Plan. However, appropriate documentation for all hazardous waste that is transported in connection with specific project-site activities would be provided as required for compliance with existing hazardous materials regulations codified in Titles 8, 22, and 26 of the CCR, and their enabling legislation set forth in Chapter 6.95 of the California Health and Safety Code. In addition, specific project-site developers are required to comply with all applicable federal, state, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to, Title 49 of the Code of Federal Regulations.

While specific development projects are not associated with approval of the Plan, it is assumed that older buildings could be demolished or remodeled as uses are redeveloped according to the land use plan. With that activity, construction workers and nearby residents and/or workers could potentially be exposed to airborne lead-based paint dust, asbestos fibers, and/or other contaminants. In addition, there is the possibility that future development may uncover previously undiscovered soil contamination or result in the release of potential contaminants that may be present in building materials (such as mold or lead), or soils underlying the site (such as radon gas). Furthermore, with two plugged wells identified by the DOGGR within the Plan Area, there is the potential for the accidental uncovering or damaging of these wells if these sites are developed. However, compliance with existing state and local regulations and Plan policies, such as Implementation Action HS-10 and Implementation Action HS-11, would reduce this impact to a less than significant level.
Mitigation Measures

Compliance with existing regulations and Plan policies would reduce impacts to a less than significant level; therefore, mitigation is not required.

| Threshold 3: | Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school |

**Impact HAZ-3**: Construction and operation of certain future land uses facilitated by the Plan, primarily general and automotive commercial uses along Main Street and industrial uses in the Fremont and Mission Regional Commercial/Industrial Hubs, could emit hazardous emissions or handle acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. However, compliance with existing regulatory requirements and Plan policies would minimize the risks to schools and students. Impacts would be less than significant.

Under the Plan, increased urban infill and reconstruction within the focus areas could increase the quantity of sensitive receptors (including schools) in areas near industrial and commercial land uses, or vice versa, thereby potentially increasing the risk of exposure to hazardous materials, waste, or emissions within 0.25 mile of an existing or proposed school.

Because the Plan does not involve any specific development projects, the quantity of hazardous materials proposed for use by future commercial and industrial developments in the City cannot be predicted with certainty. However, accidental release or combustion of hazardous materials at both existing and new commercial and/or industrial developments in the City could endanger residents or students in the surrounding community.

Given the urbanized conditions in Alhambra and the wide distribution of schools in the City, it is probable that one or more schools currently exist within 0.25 mile of a facility that does or could emit hazardous air emissions or handles hazardous materials or wastes. It is also likely that future development and redevelopment of automotive commercial uses along Main Street, and industrial uses in the Fremont and Mission Regional Commercial/Industrial Hubs focus area, may result in an increase in the handling of hazardous materials, such as used oil, solvents, batteries, or acids and bases used for cleaning, within 0.25 mile of an existing or future proposed school. The California Education Code (Section 17210 *et seq.*) outlines the requirements for siting school facilities near or on known or suspected hazardous materials sites, or near facilities that emit hazardous air emissions, handle hazardous or acutely hazardous materials, substances or waste.

Although hazardous materials and waste generated from future development of general and automotive commercial uses along Main Street and industrial uses in the Fremont and Mission Regional Commercial/Industrial Hubs may involve the use and handling of hazardous materials near schools, all businesses that handle or have on-site transportation of hazardous materials are required to comply with the provisions of the City’s Fire Code and any additional elements as required in the California Health and Safety Code Article 1, Chapter 6.95, *Hazardous Materials Release Response Plans and Inventory.* As described under Impact HAZ-3 above, both the federal and state governments require all businesses that handle more than a specified amount of hazardous materials to submit a business plan to the regulating agency. In addition, Policy HS-4B is to encourage and support enforcement of state and federal laws and regulations pertaining to the generation, use, handling, storage, and transport of hazardous materials.
Compliance with the provisions of CalEPA, CalOSHA, and the DTSC, as well as the City’s Fire Code, and implementation of Policy HS-4B would minimize the risks associated with exposure of sensitive receptors to hazardous materials. With continued implementation of these requirements on all new development in the City, this impact would be less than significant.

Mitigation Measures

Compliance with existing regulations would reduce impacts to a less than significant level. Therefore, mitigation is not required.

Threshold 4: 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 create a significant hazard to the public or the environment

Impact HAZ-4: Sites included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 are present in the City and could be subject to development under the Plan. Development at these sites could create a hazard to the public or the environment; however, implementation of state and local regulations and Plan policies would address this issue and this impact would be less than significant.

As discussed in Section 4.6.1, Setting, the City contains sites identified as being contaminated from the release of hazardous substances in the soil, including landfills, sites containing LUSTs, and large and small-quantity generators of hazardous waste. Plan implementation would facilitate development of these sites, which could create a significant hazard to the public or environment. Plan Policy HS-4E is to coordinate with the LACoFD Health Hazardous Materials Division to regulate the siting and operation of establishments handling, generating, recycling, and/or disposing of hazardous waste. If contamination at any specific development site were to exceed regulatory action levels, the developer would be required to undertake remediation procedures prior to grading and development under the supervision of the County Environmental Health Division, County Department of Toxic Substances Control, or RWQCB (depending upon the nature of any identified contamination). Hazardous materials exposure could also result from unknown contaminants that have not previously been identified.

Soil and Groundwater Contamination

Unknown Contaminated Sites

Aside from the potential release of hazardous materials from demolition of existing structures in the City, grading and excavation of sites for future development in the City resulting from implementation of the Plan may also expose construction workers and the public to potentially unknown hazardous substances present in the soil or groundwater. If any unidentified sources of contamination are encountered during grading or excavation, the removal activities required could pose health and safety risks such as the exposure of workers, materials handling personnel, and the public to hazardous materials or vapors. Such contamination could cause various short-term or long-term adverse health effects in persons exposed to the hazardous substances.

In order to address the potential for encountering unidentified contamination in the City, Policy HS-4A of the Plan is to prevent and plan for response to hazardous materials releases. This policy, and the applicable regulations cited above, would reduce the risk of exposure to hazardous materials
through contact with contaminated soils, surface water, or groundwater resources by implementing proper procedures for remediation efforts to any resources adversely impacted by urban activities.

**Known Contaminated Sites**

Potential hazards to construction workers and the public could also result from construction activities on existing land uses that are known to be contaminated. Existing sites that may potentially contain hazardous land uses in the City include landfills and large and small-quantity generators of hazardous waste. As noted previously, 269 sites identified as containing or potentially containing hazardous materials contamination are located within the City of Alhambra. These sites include LUSTs and other hazardous materials sites that are listed by the DTSC. There are two identified sites within the City that are listed in the CERCLIS database, one of which is also on the NPL. As discussed previously, these sites represent potential health hazards, and have experienced contamination from the release of hazardous substances. The distribution of contaminated sites (Figure 28) indicates that hazardous materials are predominantly located along major industrial and commercial corridors in Alhambra, which is where much of the development in the City is expected to occur under the Plan. However, any new development occurring on these documented hazardous materials sites, depending on its status and subsequent required action, would be preceded by remediation and cleanup under the supervision of the DTSC before construction activities could begin.

It is also possible that USTs that were in use prior to permitting and record keeping requirements may be present in the City. If an unidentified UST were uncovered or disturbed during construction activities, it would be closed in place or removed. Removal activities could pose both health and safety risks, such as the exposure of workers, tank handling personnel, and the public to tank contents or vapors. Potential risks, if any, posed by USTs would be minimized by managing the tank according to existing Los Angeles County standards as enforced and monitored by the Department of Environmental Health. The extent to which groundwater may be affected, if at all, depends on the type of contaminant, the amount released, and depth to groundwater at the time of the release. If groundwater contamination is identified, remediation activities would be required by the RWQCB prior to commencement of any new construction activities. Additionally, if contamination exceeds regulatory action levels, the developer would be required to undertake remediation procedures prior to grading and development under the supervision of the County Environmental Health Division, County Department of Toxic Substances Control, or RWQCB (depending upon the nature of any identified contamination).

Implementation of existing state and local regulations, Policy HS-4A, and Policy HS-4E would reduce the potential significance of impacts related to contaminated sites to a less than significant level.

**Mitigation Measures**

Compliance with existing regulations and Plan policies would reduce impacts to a less than significant level. Therefore, mitigation is not required.
Threshold 5: Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area.

Threshold 6: Be located within the vicinity of a private airstrip, resulting in a safety hazard for people residing or working in the project area.

Impact HAZ-5: IMPLEMENTATION OF THE PLAN WOULD NOT RESULT IN AN INCREASE IN PEOPLE RESIDING OR WORKING WITHIN TWO MILES OF A PUBLIC AIRPORT, BUT COULD RESULT IN AN INCREASE IN PEOPLE RESIDING OR WORKING WITHIN TWO MILES OF PRIVATELY OWNED HELIPORTS. COMPLIANCE WITH EXISTING REGULATIONS, THE CALIFORNIA AIRPORT LAND USE COMPATIBILITY PLAN, AND 14 CFR 77 WOULD REDUCE POTENTIAL SAFETY IMPACTS TO A LESS THAN SIGNIFICANT LEVEL.

Safety hazards associated with airports are generally related to construction of tall structures that could interfere with airplane flight paths, or with increasing the number of people working or residing in areas subject to crash hazards. The closest airport to the City of Alhambra is the El Monte Airport, located approximately four miles east of the eastern City limits in El Monte. While no airports or Runway Protection Zones from airports are present in Alhambra, two privately owned heliports are located in the City. The Southern California Edison Energy Control Center Heliport is located at 501 South Marengo Avenue and the Santa Fe International Corp Heliport is located at 1000 South Fremont Avenue. Both are within two miles of all four focus areas under the Plan.

Under the Plan, residential, commercial, and industrial uses could be constructed in proximity to these two heliports. However, the Plan does not change the height limits that currently apply to both existing and new uses in these areas. Compliance with existing regulations, including any polices arising out of the California ALUCP, would reduce potential hazards. 14 CFR 77 would require the proponent of any planned development to file notice with the FAA for any construction or alteration that exceeds an imaginary surface extending outward and upward at a slope of 25 to 1 for a horizontal distance of 5,000 feet from the nearest point of the nearest landing and takeoff area of a heliport described in 14 CFR 77.9(d). However, if future development in the vicinity of the two identified heliports were “shielded by existing structures of a permanent and substantial nature of equal or greater height,” a notice to the FAA under 14 CFR 77 would not be required. Compliance with 14 CFR 77, under its applicable conditions, and existing regulations that establish local consistency with the California ALUCP would reduce impacts to a less than significant level.

Mitigation Measures

Compliance with existing regulations would reduce impacts to a less than significant level. Therefore, mitigation is not required.

Threshold 7: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Impact HAZ-6: POLICIES INCLUDED IN THE PLAN ADDRESS IMPLEMENTATION OF ADOPTED EMERGENCY RESPONSE AND EVACUATION PLANS. THEREFORE, THE PLAN WOULD NOT RESULT IN INTERFERENCE WITH THESE TYPES OF ADOPTED PLANS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

With additional growth in the City’s population that could result from implementation of the Plan, plus regional traffic growth, traffic conditions in and around Alhambra could become more congested (for more discussion of this issue, see Section 4.12, Transportation/Traffic). In the event
of an accident or natural disaster, this increase in traffic may impede the rate of evacuation for the City’s residents. Concurrently, the response times for emergency medical or containment services could also be adversely affected by increased traffic.

The City’s Emergency Operations Center (EOC), operating out of the Office of the Police Department, is activated in an emergency. The EOC brings together resources and personnel to make decisions and coordinate the flow of information and strategies required to deal effectively with the crisis. Alerting public officials, shelter/evacuation, search and rescue, and resource mobilization are all part of the response mode (Alhambra 2017).

As noted in Section 4.6.1, Setting, the SEMS MHFP addresses the City of Alhambra’s planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The operational concepts reflected in the Plan focus on potential large-scale disasters that can generate unique situations requiring unusual emergency responses. The intent of the SEMS law is to improve the coordination of state and local emergency response in California. In addition, Alhambra’s Emergency Service and Civil Disaster Plan address natural hazards, risks and mitigation actions for the entire City.

The Alhambra Fire Department, in collaboration with the LACoFD, has developed a Community CERT. The purpose of the CERT program is to rapidly respond as a team to assist the community and local first responders with an emergency, disaster, or incident that requires additional assistance. CERT members are trained in disaster preparedness, first aid, communications and good teamwork, fire safety, disaster medical operations, and search and rescue.

The Plan contains the following goal and policies relating to maintaining the City’s emergency management services:

**Goal HS-5** Prevention and minimization of the adverse effects of emergencies.

**Policy HS-5A** Plan for emergency response and recovery from urban disasters such as earthquake and terrorist threats.

**Policy HS-5B** Make the public aware of City emergency response plans, procedures, resources, risk reduction strategies, and mitigation measures.

Implementation of Plan policies and management plans associated with emergency response and evacuation in the City would reduce impacts to a less than significant level.

**Mitigation Measures**

Compliance with existing regulations and Plan policies would reduce impacts to a less than significant level. Therefore, mitigation is not required.
4.7 Hydrology and Water Quality

This section addresses impacts to the City’s drainage infrastructure, as well as surface water quality impacts, from implementation of the Plan. Watershed, groundwater, and water quality information was obtained from the City of Alhambra 2015 Draft Urban Water Management Plan, the General Plan Update Community Profile, and the Los Angeles Regional Water Quality Control Board (LARWQCB).

4.7.1 Setting

a. Watershed and Surface Water

Alhambra is located at the west end of the Main San Gabriel Basin (Main Basin). The Main Basin lies in eastern Los Angeles County. The hydrologic basin or watershed coincides with a portion of the upper San Gabriel River watershed. Generally, water movement in the Main Basin is from the San Gabriel Mountains to the north to Whittier Narrows to the southwest. The watershed is drained by the San Gabriel River and Rio Hondo, a tributary of the Los Angeles River.

The San Gabriel River bisects the Main Basin. The river flows through the San Gabriel Canyon and enters the Main Basin at the mouth of the canyon just north of the City of Azusa. The San Gabriel River then flows southwesterly across the valley to Whittier Narrows, a distance of approximately 15 miles. It then crosses the Coastal Plain in a southerly direction to reach the Pacific Ocean at Alamitos Bay near the City of Long Beach (Alhambra 2016a).

The San Gabriel River is joined and fed by several tributary creeks and washes. The channels of the San Gabriel River and the Rio Hondo run parallel to each other and about two miles apart for much of their length with a confluence in the Whittier Narrows Flood Control Basin (Wikipedia 2017). Tributaries draining the westerly portion of the main basin feed the Rio Hondo. Santa Anita Wash, Eaton Canyon Wash, Rubio Wash, and Alhambra Wash all cross the Raymond Basin area before entering the Main Basin. The Channel of the Rio Hondo passes through Whittier Narrows westerly of the San Gabriel River then flows southwesterly to join the Los Angeles River on the Coastal Plain (Alhambra 2016a).

Many of the stream channel tributaries to the San Gabriel River have been channelized with concrete banks, and concrete-lined bottoms. These concrete banks and bottoms have reduced the area of pervious stream channels and reduce Main Basin recharge. A number of off-stream groundwater replenishment facilities have been established along these stream channels to offset these reductions in recharge. Some of the facilities are accessible to imported water supplies, while some facilities receive only local runoff (Alhambra 2016a). The City of Alhambra has no year-round bodies of surface water (Figure 30).

b. Topography

Alhambra lies on the western edge of the San Gabriel Valley, which is an alluvial plain created by the weathering of the San Gabriel Mountains. The plain slopes generally to the southeast at about 1.05 feet for every 100 feet. The mean elevation of the City is 460 feet above sea level, with a range in elevation from 380 feet in the southeastern portion of the City to 580 feet in the northwest corner. The City’s topography is relatively level in most areas, with no substantial hillside areas or slopes.
other than hills near the western and southern edges of the City and slopes created by San Pascual Wash and Alhambra Wash in the eastern part of the City (Alhambra 2017b).

c. Groundwater

The City is part of the San Gabriel Valley Municipal Water District (SGVMWD), and has the right to pump groundwater from the main San Gabriel Basin and the Raymond Basin to serve over 90,000 customers. About 80 percent of the City’s water comes from nine active wells drawn from the Main San Gabriel Basin. The City has a legal right to pump from the Raymond Basin, but currently does not operate any active wells in this basin due to high nitrate levels, which do not meet state standards. While the City is not a member agency of the Upper San Gabriel Valley Municipal Water District (Upper District), it can purchase treated imported water from the Upper District, and does so to obtain the remaining 20 percent of its water (Alhambra 2016a, Alhambra 2017b). More information on water supply can be found in Section 4.14, Utilities and Service Systems.

The Main Basin underlies most of the San Gabriel Valley. This groundwater basin is bounded by the San Gabriel Mountains to the north, the San Jose Hills to the east, the Puente Hills to the south, and by a series of hills and the Raymond Fault to the west. Principal water-bearing formations of the Main Basin are unconsolidated and semi-consolidated sediments, which range in size from coarse gravel to fine-grained sands (Alhambra 2016a). The surface area of the Main Basin is approximately 167 square miles. The fresh water storage capacity of the Main Basin is estimated to be about 8.6 million acre-feet. The Main Basin is divided into two main parts, the Main Basin and the Puente Subbasin. The Puente Subbasin is located in the southeast portion of, and is tributary to, the Main Basin, and is hydraulically connected to it with no barriers to groundwater movement. The Puente Subbasin is, however, not within the legal jurisdiction of Main San Gabriel Basin Watermaster, an agency charged with administering adjudicated water rights and management and protection of groundwater resources within the watershed and watershed basin of the Main San Gabriel Groundwater Basin. Thus it is considered a separate entity for management purposes. Generally, water movement in the Main Basin is from the San Gabriel Mountains on the north side to the Whittier Narrows on the southwest side. The Basin is an unconfined aquifer (Alhambra 2016a). The City pumps its groundwater from the westerly portion of the Main Basin, which is referred to as the Alhambra Pumping Hole (APH). The APH is an area with limited replenishment due to the tightness of the groundwater formations and limited facilities for direct recharge. Replenishment of the Main Basin in the area from the Rio Hondo east has little effect on the APH due to limited transmissibility through the tighter formation west of the Rio Hondo. The Main Basin is replenished by stream runoff from the adjacent mountains and hills, by rainfall directly on the surface of the valley floor, subsurface inflow from the Raymond Basin and the Puente Basin, and by returning flow from water applied for overlying uses. The Basin is also replenished with imported water (Alhambra 2016a).

Main Basin Management is described in the Basin Watermaster document entitled Five-Year Water Quality and Supply Plan. The Basin Watermaster was created in 1973 to resolve water issues that had arisen among water users in the San Gabriel Valley. The Basin Watermaster manages the water supply of the Main Groundwater Basin. Local water agencies adopted a joint resolution in 1989 regarding water quality issues that stated the Basin Watermaster should coordinate local activities to preserve and restore the quality of groundwater in the Main Basin. Updates to the Five-Year Water Quality and Supply Plan (Five-Year Plan) and annual updates are submitted to LARWQCB.

The United States Environmental Protection Agency (USEPA) established Operable Units for the various areas within the Basin that have been contaminated and require groundwater cleanup. The
Operable Units include Alhambra (Area 3). The *Five-Year Water Quality and Supply Plan* (Five-Year Plan) describe cleanup efforts of each of the Operable units. The objective of the Five-Year Plan is to coordinate related activities so that both water supply and water quality in the Main Basin are protected and improved; and specifically addresses groundwater contamination and the implementation of cleanup plans. In areas where groundwater supply has been affected by contamination, the Basin Watermaster works with affected Producers and other local water agencies to implement clean up as quickly as possible, with or without the cooperation of the Responsible Parties.

The Area 3 Operable Unit is located in the westerly portion of the Main Basin. It is generally bounded on the south by the Interstate 10 (I-10) Freeway, on the east by Rosemead Boulevard, on the North by Huntington Drive, and on the west by the boundary of the Main Basin. The USEPA has installed a series of monitoring wells to collect water quality data to supplement data collected from water supply wells and has initiated a Remedial Investigation and Feasibility Study to identify the extent of the contamination and to evaluate appropriate cleanup remedies. Section 28 of the Basin Watermaster’s Rules and Regulations require all producers (including the City) to submit an application to 1) construction a new well, 2) modify an existing well, 3) destroy a well, or 4) construct a treatment facility. In 2006, the Basin Watermaster issues a permit to the City to construct a treatment facility to remove VOCs from wells No. 7, 8, 11, and 12. The treatment facility became operational in April 2009, prior to USEPA’s development of a final remedy, but is necessary for Alhambra to receive a reliable source of supply from the groundwater basin. The facility has treated about 22,300 acre-feet (AF) and has removed about 700 pounds of contaminants.

The Basin Watermaster prepares a report on the implications of proposed activity of the Operable Units. As a party to the Main Basin Judgment, Alhambra reviews a copy of these reports and is provided the opportunity to submit comments on the proposed activity before the Basin Watermaster Board takes its final action. The Basin Watermaster continues to administer and monitor the quality and supply capacity of the Basin and to ensure that the water supply needs of the region are met. The Basin Watermaster continues to work with affected Producers, Responsible Parties, and others to achieve these goals.

The two Judgements, River Watermaster and the Basin Watermaster, and the Five-Year Water Quality and Supply Plan make up the groundwater management plan for the Main Basin (Alhambra 2016a).

d. Flood Hazards

Flooding can cause widespread damage. Buildings and vehicles can be damaged or destroyed, while smaller objects can be buried in flood-deposited sediments. Floods can also cause drowning or isolation of people or animals. In addition, floodwaters can break utility lines, interrupting services and potentially affecting health and safety, particularly in the case of broken sewer or gas lines.

The secondary effects of flooding are due to standing water, which can result in crop damage, septic tank failure, and water well contamination. Standing water can also damage roads, foundations, and electrical circuits.

Inadequately-sized culverts and bridges can create impediments to the passage of high water flow in streams and gullies. Undersized infrastructure typically results in short-term back-ups behind the culvert of bridge, with pooling water in such areas, in effect, an unintended detention basin.

Potential flooding could occur in Alhambra from intense localized rainstorms and spillover from nearby flood control channels. To protect the community, Los Angeles County maintains and
continues to improve storm drainage and flood control facilities which reduce the threat of flooding in the event of a 100-year flood (Alhambra 2015a).

**FEMA 100-Year Flood Hazard**

The Federal Emergency Management Agency (FEMA) establishes base flood heights for 100-year and 500-year flood zones. As shown in Figure 30, the City of Alhambra is not located in or in proximity to a 100-year or 500-year floodplain. Flooding in the City is limited to localized problem areas resulting from inadequate drainage capacity. For example, potential flooding can occur due to ponding caused by intense localized rainstorms and spillover from nearby flood control channels, including the Alhambra Wash and the San Pascual Wash (located in the northeast portion of the City) and the Laguna Channel (at the southwest corner of the City) during a 100-year flood. Flood control improvements locally and within the surrounding region have reduced the potential for flooding in the event of a 100-year flood to acceptable levels (Alhambra 2017b).

**Dam Inundation**

Dam failure from any local and regional dams would not create flooding in Alhambra. There are two dams north of the City near the base of the San Gabriel Mountains: one at Devil’s Gate Reservoir on the Arroyo Seco six miles north of the City and the other at Eaton Wash Reservoir on Eaton Wash 4.2 miles north of the City. The City is not in dam inundation areas for either dam (Alhambra 2015a). In addition, the City of Alhambra is 22 miles east of the Pacific Ocean, outside of a Tsunami Hazard Area (Los Angeles County 2015).

e. **Water Quality**

The primary sources of pollution to surface and groundwater resources include the following:

- Stormwater runoff from paved areas, which can contain hydrocarbons, sediments, pesticides, herbicides, toxic metals, and coliform bacteria
- Improperly placed septic tank leach fields, and properly placed septic tanks that do not have proper residence time or are not properly maintained or have improperly disposed of household cleaners and other materials
- Illegal waste dumping that can introduce contaminants such as gasoline, pesticides, herbicides and other harmful chemicals

The City of Alhambra’s Utilities Division conducts regular water quality testing. The City collects approximately 6,000 individual water samples for testing at independent laboratories and ensures that water quality standards are satisfactory. In 2008, the City completed construction of a water treatment facility that treats water for nitrates and volatile organic compound (VOC) removal. This facility allows the City to pump groundwater from two previously inactive wells (Alhambra 2015a).

**Regulatory Framework**

Development in the Plan Area is subject to various local, state, and federal regulations and permits regarding the use of water resources.

Section 303 of the federal Clean Water Act (CWA) requires states to develop water quality standards to protect the beneficial uses of receiving waters. In accordance with California’s Porter/Cologne Act, the Regional Water Quality Control Boards (RWQCB) of the State Water Resources Control Board (SWRCB) are required to develop water quality objectives that ensure their region meets the
Figure 30 FEMA Flood Zones
requirements of Section 303 of the CWA. Alhambra is within the jurisdiction of the Los Angeles RWQCB, District 4.

Under CWA Section 303 (d), states are required to submit to USEPA a list identifying waters within their boundaries not meeting water quality standards (impaired waters) and the water quality parameter (i.e., pollutant) not being met, referred to as the 303 (d) list. The three washes that transect the City, the Alhambra, San Pascual, and Laguna washes, are not listed by the SWRCB as Impaired Waters under CWA Section 303(d) (SWRCB 2016).

The federal government also administers the National Pollutant Discharge Elimination System (NPDES) permit program, which regulates discharges into surface waters. Section 404 of the CWA prohibits the discharge of dredged or fill materials into Waters of the United States or adjacent wetlands without a permit from the U.S. Army Corps of Engineers (USACE). As discussed under Flood Hazards, the Federal Emergency Management Agency (FEMA) establishes base flood heights for 100-year and 500-year flood zones.

The primary regulatory control relevant to the protection of water quality is the Federal National Pollution Discharge Elimination System (NPDES) permit administered by the SWRCB, which establishes requirements prescribing the quality of point sources of discharge and establishes water quality objectives. These objectives are established based on the designated beneficial uses (e.g., water supply, recreation, and habitat) for a particular surface water or groundwater. The NPDES permits are issued to point source dischargers of pollutants to surface waters and are issued pursuant to Water Code Chapter 5.5 that implements the CWA. Examples include, but are not limited to, public wastewater treatment facilities, industries, power plants, and groundwater cleanup programs discharging to surface waters (SWRCB, Title 23, Chapter 9, Section 2200). Under the NPDES permits, discharge limits for minerals and pollutants are established and regulated by the SWRCB.

Alhambra relies on Municipal Code Title XVI, Sewer, and other enforcement sections of the Municipal Code to require permits and oversee the implementation of any land use or development involving grading activities, or the construction of new structures or paving. Chapter 16.34, Storm Water and Urban Runoff Pollution Control of the Municipal Code establishes minimum standards, guidelines, and/or criteria for specific discharges, connections, and/or Best Management Practices (BMP). Additional measures are required by the City, when applicable, to prevent or reduce the discharge of pollutants to achieve water quality standards and receiving water limitations. The Chapter includes prohibitions for illicit discharges to enter the Phase II Small Municipal Separate Storm Sewer System (MS4) Program, requires implementation of BMPs, including the installation and maintenance of structural BMPs, and requires storm water measures (Alhambra 2017a).

On February 10, 2003, with subsequent amendments in 2003 and 2013, the City established a requirement that each person applying to the City for a grading or building permit for projects requiring compliance with regulations governing statewide General Construction Activity Stormwater Permits (GCASP) must submit satisfactory proof to the City that the following has been complied with prior to the issuance of a permit on the construction project:

1) That a Notice of Intent (NOI) to comply with GCASP has been filed
2) That a Storm Water Pollution Prevention Plan (SWPP) has been prepared

The City also requires that a copy of the NOI and SWPPP be maintained on-site during grading and construction, and be made available for inspection by a City inspector (Alhambra 2017a).
The City’s process for BMP selection generally coincides with four standard elements: sediment control, erosion control, site management, and materials and waste management. There are both structural BMPs and construction BMPs required by the City for mitigation of long-term and temporary water quality impacts, respectively. Structural BMPs include any structure facility, both Treatment Control BMP’s and Source Control BMP’s (e.g., mechanical filtration, separators, vegetative swales, and biofilters), designed and constructed to mitigate the adverse impacts of stormwater and urban runoff pollution that reduce or eliminate long term impacts to water quality.

In December 2002, with subsequent amendments in March 2014, the City adopted Municipal Code Chapter 16.36 Stormwater Low Impact Development (LID) Standards. The LID Standards contain requirements for construction activities and facility operations of development and redevelopment projects to comply with the current “Municipal NPDES permit,” lessen the water quality impacts of development using smart growth practices, and integrate LID design principles to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use.

Alhambra uses the latest edition of the Los Angeles County Hydrology Manual, which includes standards for the development of hydrology and related drainage models for development in the area (Martin 2017). The Manual describes the methodologies to be utilized in the calculation of existing and proposed stormwater runoff, based on soils types, density of development, flow path characteristics, and time of concentration. The Manual specifies the design event for which the facility under consideration must be designed (10-year, 25-year, or 50-year frequency event). The Manual contains multiple appendices which provide site specific data Countywide on soil characteristics, runoff coefficients, intensity of rainfall versus storm duration, impermeability versus land use, as well as debris production classification. Soils in the San Gabriel Valley and Alhambra consist of alluvial debris deposited from the weathering of the San Gabriel Mountains, including gravelly loams, sandy loams, and clays. Due to the urbanized nature of the City and its fairly level topography, soil erosion generally is not a major issue (Alhambra 2017b).

The method of quantifying the effects of sediment and debris production to storm runoff is referred to as “bulking” and is delineated in the Los Angeles County Sedimentation Manual as well as Los Angeles County Hydrology Manual and related appendices. These methods are adopted for use in the City of Alhambra, and are used by the County of Los Angeles for their review of storm drains and basins intended for transfer to the County for ownership and maintenance (Martin 2017).

The requirements for design and construction of storm drains and related facilities (debris and detention basins, inlet and outlet structures) are contained in the Los Angeles County Flood Control District’s Design Manual (Hydraulic), Debris Basin Manual, and Los Angeles County Sedimentation Manual. The methodologies contained in these Manuals are adopted for use in the City of Alhambra, and are used by the County of Los Angeles for their review of storm drains and related interception and conveyance facilities intended for transfer to the County for ownership and maintenance (Martin 2017).

The storm drain collection system within Alhambra is predominantly owned by the City, although Los Angeles County Sanitation District sewer lines that receive flow from the City’s collection system are not owned by the City (Martin 2017). Connections to County of Los Angeles storm drains are reviewed and approved by the County according to County of Los Angeles Design and Construction standards. The City of Alhambra reviews and approves the storm drain system in conjunction with proposed grading, paving and roadway plans to ensure compliance of the storm drains with these standards. As the lead agency in project review, the City is co-signatory on the storm drain plans, with the final approval for construction issued by the County under their permit. In some locations, storm drains are privately owned and maintained by Home Owners Associations under specific
conditions which are reviewed and approved by the City in association with the project’s approval. These conditions pertain to requirements for perpetual maintenance of the storm drain system, detention requirements, and structural water quality mitigation measures, which are in turn incorporated into the project’s Covenants, Conditions and Restrictions.

4.7.2 Impact Analysis

a. Methodology and Significance Thresholds

This section describes the potential environmental impacts of the Plan relevant to hydrology and water quality. The impact analysis is based on an assessment of baseline conditions for the Plan Area, including watershed and surface waters, topography, groundwater, flood hazards, and water quality, as described in Section 4.7.1, Setting. This analysis identifies potential impacts based on the predicted interaction between the affected environment and construction, operation, and maintenance activities related to the Plan. This section describes impacts in terms of location, context, duration, and intensity, and recommends mitigation measures, when necessary, to avoid or minimize impacts.

According to Appendix G of the State CEQA Guidelines, impacts would be considered significant if Plan implementation would do any of the following:

1. Violate any water quality standards or waste discharge requirements
2. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site
4. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site
5. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff
6. Otherwise substantially degrade water quality
7. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map
8. Place within a 100-year flood hazard area structures which would impede or redirect flood flows
9. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam
10. Expose people or structures to significant risk or loss, injury or death involving inundation by seiche, tsunami, or mudflow
Project and Cumulative Impacts

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<th>Threshold 1:</th>
<th>Violate any water quality standards or waste discharge requirements</th>
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<tbody>
<tr>
<td>Threshold 6:</td>
<td>Otherwise substantially degrade water quality</td>
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**Impact HWQ-1:** Development facilitated by the Plan could increase pollutants in stormwater and wastewater, but Plan policies and existing regulations would ensure that water quality standards and waste discharge requirements would not be violated. Therefore, impacts to water quality would be less than significant.

**Construction**

Construction activities facilitated by the Plan could include road improvements, installation and realignment of utilities, demolition of existing structures for replacement, new development, and the potential replacement and/or improvement of drainage facilities. Water quality degradation from construction would be specific to each site within the Plan Area, and thus would depend largely on the areas affected, the length of time soils would be subject to erosion, and what construction activities would be carried out on the site. As described in Section 2.0, Project Description, new development facilitated by the Plan would generally result in re-use of properties, conversion of uses in response to market demand (e.g., select industrial to commercial), and more intense use of land in certain areas focused around the main roadway corridors of the City (i.e., West Main Street, Valley Boulevard Corridor, Garfield Medical Office Corridor, and the Fremont and Mission Palm “Industrial Corridor”).

Temporary soil disturbance would occur due to construction of future developments facilitated by the Plan as a result of earth-moving activities such as excavation and trenching for foundations and utilities, soil compaction and moving, cut and fill activities, and grading. If not managed properly, disturbed soils would be susceptible to high rates of erosion from wind and rain, resulting in sediment transport via stormwater runoff from the Plan Area. The types of pollutants contained in runoff from construction sites in urban areas typically include sediments and contaminants such as oils, fuels, paints, and solvents. Additionally, other pollutants, such as nutrients, trace metals, and hydrocarbons, can attach to sediment and be transported to downstream drainages and ultimately into collecting waterways, contributing to degradation of water quality.

Areas that disturb one or more acres of land surface are subject to the Construction General Permit, 99-08-DWQ adopted by the SWRCB. Alhambra requires the preparation of a SWPPP to achieve compliance with the NPDES General Construction Stormwater Activity Permit. Compliance with the permit requires each qualifying development project to file an NOI with the SWRCB. The SWPPP must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of construction sites before and after storms is also required to identify stormwater discharge from the construction activity and to identify and implement controls, where necessary. The SWPPP requirements would need to be satisfied prior to beginning construction of any project located on a site greater than one acre (Alhambra 2017a).
New development would also be subject to the SWRCB’s NPDES General Construction Activity Stormwater Permit, NPDES MS4 regulations, and the City’s Municipal Code (described in Section 4.7.1, Setting), which would reduce the risk of short-term erosion resulting from drainage alterations during construction. BMPs would be required to reduce the discharge of pollutants to the maximum extent practicable, including the removal and lawful disposal of any solid waste or any other substance which, if it were to be discharged to the MS4, would be a pollutant, including fuels, waste fuels, chemicals, chemical wastes and animal wastes, from all parts of the premises exposed to stormwater (Alhambra 2017a).

Per Section 16.34.070 (c), “each person applying for a grading or building permit for any project for which compliance with regulations governing State Construction Activity Storm Water Permits is not required, shall submit to the city for information, and shall implement a grading and construction activity runoff control program adequate to accomplish the following:”

1. Retain on-site the sediments generated on or brought to the project site, using treatment control of structural BMPs
2. Retain construction-related materials and wastes, spills and residues at the project site and prevent discharges to streets, drainage facilities, the MS4, receiving waters or adjacent properties
3. Contain non-stormwater runoff from equipment and vehicle washing at the project site
4. Control erosion from slopes and channels through use of effective BMPs, such as limitation of grading during the wet season, inspection of graded areas during rain events; planting and maintenance of vegetation slopes, if any, and covering any slopes susceptible to erosion. (Alhambra 2017a)

The Plan also includes goals and policies designed to maximize stormwater infiltration, and to strengthen the City’s maintenance program for stormwater detention basins and culverts, that would further improve water quality in the City.

Resources Goals and Policies

Policy R-1E Maximize stormwater filtration and/or infiltration through use of low-impact development methods

Services and Infrastructure Goals and Policies

Goal SI-10 A wastewater and stormwater collection and treatment system that meets the needs of existing and planned development

Policy SI-10A Maintain, upgrade, and expand wastewater and stormwater collection facilities to ensure that wastewater and stormwater generated in Alhambra can be effectively managed

Policy SI-10E Require storm drain infrastructure that implements Low Impact Development practices (bioretention areas, cisterns, and/or rain barrels) and incorporates state-of-the-art best management practices.

Compliance with the regulations discussed above would reduce the risk of water degradation within the City from soil erosion and other pollutants related to construction activities. Since violations of
water quality standards would be minimized, impacts to water quality from construction activities within the City as a whole would be less than significant.

**Operation**

Alhambra is a built-out community, with only one percent of the City classified as vacant land. Because the Plan would focus on redevelopment of existing urbanized areas, future development would introduce relatively small amounts of net new impervious surfaces (Alhambra 2017b).

Although the increase in volumes or rates of discharge and associated pollutants in runoff would be minimal, the operation of future development could potentially result in the addition of contaminants into both stormwater runoff entering the City’s drainage system and wastewater entering the local wastewater collection and treatment system. If not managed properly, runoff from urban development can contain contaminants such as oil, grease, metals, and landscaping chemicals (pesticides, herbicides, fertilizers, etc.), which could be transported into the City’s drainage system and ultimately degrade surface water and groundwater quality.

Water quality discharge requirements meeting area-wide surface water use objectives are established as permit requirements by the LARWQCB. Under the LARWQCB’s NPDES permit system, all existing and future municipal and industrial discharges to surface waters within the City would be subject to regulations. NPDES permits are required for operators of MS4s, construction projects, and industrial facilities. These permits contain limits on the amount of pollutants that could be contained in each facility’s discharge. Specifically, all development within the City would be subject to the provisions of the City’s NPDES MS4 Permit No. CAS004001 (Order No. R4-2012-0175-A01 amended 2015). (LARWQCB 2015)

Future developments in the City would also be subject to the provisions Sections 16.34.020 and 16.34.030 of the Alhambra Municipal Code. Under the provisions of Section 16.34.020, no person shall cause any illicit discharge to enter the MS4 unless specific exemptions listed in the section are met. Under the provision of Section 16.34.030, no person shall use or suffer the use of illicit connection to convey an illicit discharge or any pollutant to the MS4 from the premises of which that person is an owner or is the person in charge of day-to-day activities. Discharges of material other than stormwater must be in compliance with an NPDES permit issued for the discharge with appropriate BMPs in place.

Any new development or redevelopment project is required to comply with Chapter 16.36, Stormwater Low Impact Development Standards, prior to issuance of any permit. Further, as a condition of a certificate of occupancy for a new development or redevelopment project, the Director of Public Works, Utilities Division (Director), shall require the applicant, facility operator, or owner to construct all stormwater pollution control BMPs and structural or treatment control BMPs shown on the approved project plans and submit a signed certification stating that the project site and all structural or treatment control BMPs will be maintained in compliance with this chapter and other applicable regulatory requirements until responsibility for such maintenance is legally transferred. Applicants/facility operators or owners are required to provide, as required by the Director, any other legally enforceable agreement that assigns responsibility for the maintenance of post construction structural or treatment control BMPs.

“Planning Priority Projects” including development and redevelopment projects listed under Section 16.36.040 - Stormwater Low Impact Development Standards, are required to comply with Stormwater Pollution LID Control Measures. Under Section 16.36.040, the site for every planning priority project shall be designed to control pollutants, pollutant loads, runoff volume to the
maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention and/or rainfall harvest and use.

Section 16.36.060, Source Control Best Management Practices, requires the application of BMPs to ministerial as well as discretionary approvals of signage at storm drains, outdoor storage of materials, outdoor trash areas, loading docks, repair and maintenance bays, wash areas, and restaurants. The Director is authorized to require additional BMPs which are listed in the NPDES MS4 Permit Order No. R4-2012-0175 A-01.

In addition to stormwater runoff, polluted wastewater could be discharged by development facilitated by the Plan. Wastewater generated in the City is treated by the Sanitation District of Los Angeles County (LACSD). Wastewater generated in the City is treated at one or more of the following: the Whittier Narrows Reclamation Plant (WRP) located near the City of South El Monte, which as a capacity of 15 million gallons per day (mgd) and currently produces an average recycled water flow of 7.1 mgd; the Los Coyotes WRP located in the City of Cerritos, which has a capacity of 37.5 mgd and currently produces an average recycled water flow of 20.6 mgd; or the Joint Water Pollution Control Plan located in the City of Carson, which has a capacity of 400 mgd and currently produces an average flow of 252.7 mgd (County Sanitation Districts of Los Angeles County 2018). These plants are capable of treating the potential increase in wastewater associated with buildout under the Plan (see impact analysis U-2). Ultimately, treatment would produce a high quality tertiary effluent that can be used for a variety of industrial and irrigation purposes. Section 4.13, Utilities and Service Systems, contains a more detailed description of wastewater services for the City.

Plan goals and policies listed under Construction at the beginning of this impact discussion, as well as regulations in the Alhambra Municipal Code, are designed to minimize operational stormwater impacts. Specifically, Code Section 16.36.050 promotes LID to minimize urban runoff discharges from developed areas. Compliance with NPDES permits requirements, the City’s Municipal Code, and Plan policies would reduce the risk of water contamination within the City from operation of new developments to the maximum extent practicable. Therefore, this impact would be less than significant.

Further, if degradation of groundwater quality occurred, it could reduce the groundwater basin yield, diminishing production from existing activities and limiting future groundwater development. As determined in Section 4.13, Utilities and Service Systems, Impact U-1 states that development under the Plan would be adequately served by the existing water supply.

Common sources of groundwater contamination include leaking underground storage tanks, septic systems, oil fields, landfills, and general industrial land uses. Implementation of the Plan would not involve construction of oil fields or landfills. All lots intended for building development are required to be connected to a public sewer system. Therefore, degradation of groundwater quality from these sources would not result from development facilitated by the Plan. Therefore, the Plan would not substantially degrade water quality, and this impact would be less than significant.

**Mitigation Measures**

Implementation of Plan policies and existing regulations would reduce potential water quality impacts to a less than significant level. Therefore, mitigation is not required.
Threshold 2: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).

Impact HWQ-2: Development facilitated by the Plan would incrementally increase the amount of impervious surfaces in the City, resulting in an increase in runoff and decrease in percolation to the main San Gabriel Groundwater Basin. However, with implementation of Plan policies and existing regulations, impacts related to the increase in impervious surfaces would be less than significant.

Construction activities facilitated by the Plan would primarily occur as part of infill/redevelopment. Construction activities such as pile driving and dewatering could encounter groundwater. Although the construction of support and foundation structures could contact groundwater in limited instances, the displaced volume would not be substantial relative to the volume of the San Gabriel Valley Regional Groundwater Basin, which has a total storage capacity of approximately 10,740,000 AF (California’s Groundwater Bulletin No. 118, 2004). Dewatering activities could also remove groundwater, but the volume of water removed would not be substantial relative to groundwater pumping for water supply. Water used during construction for cleaning, dust control, and other uses would be nominal. Thus, construction activities would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge.

As described in the Section 2, Project Description, for most of the City the Plan preserves the existing pattern of uses and establishes policies for protection and long-term maintenance of established neighborhoods. In general, new development facilitated by the Plan would result as re-use of properties, conversion of uses in response to market demand (e.g., select industrial to commercial), and more intense use of land in defined areas. With development of these areas, the amount of impervious surface in the City would incrementally increase. Nonetheless, new development facilitated by the Plan would primarily consist of infill in already urbanized areas, where increases in impervious surfaces would be minimal. Furthermore, new development must comply with Los Angeles County’s MS4 permit by employing BMPs for on-site detention/retention of stormwater runoff. Thus, development facilitated by the Plan would not substantially interfere with groundwater recharge.

New development facilitated by the Plan would increase the demand for water, most of which would derive from groundwater sources. For the existing conditions of the City’s groundwater supply (Section 4.13, Utilities and Service Systems). As described in Section 4.13 (Impact U-1), due to existing water rights, an adequate supply of water should be available, with normal conservation efforts, for the projected demands through 2040 (Alhambra 2016a). Implementation of Policy SI-10E (listed below) would require projects to implement LID practices that improve groundwater recharge and surface water quality. In addition, a number of other Plan goals and policies (also listed below) would serve to improve and enhance groundwater resources.
Resources Goals and Policies

Goal R-1  Maintenance of water supplies that meet the needs of Alhambra residents, businesses, and visitors

Policy R-1B  Encourage water conservation and, when feasible, use recycled water in residential, commercial, industrial, public, and other development

Policy R-1C  Efficiently manage water demands and efficiently use urban water supplies

Policy R-1D  Focus on further development and implementation of water conservation programs

Policy R-1E  Maximize stormwater filtration and/or infiltration through use of low-impact development methods

Services and Infrastructure Goals and Policies

Goal SI-10  A wastewater and stormwater collection and treatment system that meets the needs of existing and planned development.

Policy SI-10D  Explore ways in which gray water can be used to reduce demands on groundwater and other water supplies.

Policy SI-10E  Require storm drain infrastructure that implements Low-Impact Development practices (bioretention areas, cisterns, and/or rain barrels) and incorporates state-of-the-art best management practices.

Implementation of these and other policies and regulations included in the Plan and Alhambra Municipal Code would encourage water conservation and reduce potential impacts to groundwater supply. As such, the creation of impervious surfaces, which could interfere with groundwater recharge within the City, under the Plan, would not substantially deplete groundwater supplies. Therefore, this impact would be less than significant.

Mitigation Measures

Implementation of the Plan would not substantially deplete groundwater supplies. Therefore, mitigation is not required.
Threshold 3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site.

Impact HWQ-3: Development facilitated by the Plan could alter the existing drainage pattern in some parts of the Plan Area. However, implementation of goals and policies included in the Plan, and enforcement of existing regulations, would protect the City’s existing drainage pattern from substantial alteration and minimize erosion and siltation from such activities. These impacts would therefore be less than significant.

Construction

Construction activities associated with development facilitated by the Plan would involve stockpiling, grading, excavation, dredging, paving, and other earth-disturbing activities resulting in the alteration of existing drainage patterns. The Plan includes policies designed to maximize stormwater infiltration. As described in Impact HWQ-1 and Impact HWQ-2, Policy R-1E would is to maximize stormwater infiltration and/or infiltration through use of low-impact development methods, and compliance with SWRCB’s NPDES General Construction Activity Stormwater Permit, NPDES MS4 regulations, and the City’s Municipal Code would reduce the risk of short-term erosion resulting from drainage alterations during construction. Therefore, construction-related erosion and siltation impacts would be less than significant.

Operation

Development facilitated by the Plan would result in alterations to drainage, such as changes in ground surface permeability via paving, and changes in topography via grading and excavation. Impact HWQ-1 discusses applicable regulations that would limit pollutant discharges from development facilitated by the Plan. NPDES permit requirements would be imposed on applicable projects to limit pollutant discharges. Further, all development within the City would be subject to the provisions of the City’s NPDES MS4 Permit.

The Plan includes Policy R-1E to maximize stormwater filtration and/or infiltration through use of LID methods; and Policy SI-10E to require storm drain infrastructure that implements Low-Impact Development (LID) practices (such as bioretention areas, cisterns, and/or rain barrels) and incorporates state-of-the-art best management practices (BMPs). Further, the Alhambra Municipal Code requires the integration of LID stormwater management practices for development and redevelopment projects, specifically those listed as “Planning Priority Projects under Section 16.36.040 (Alhambra 2017a). This approach to stormwater management strives to restore a site’s natural hydrologic features through the arrangement of buildings, roads, parking areas, site features and stormwater management plans. This more sustainable approach to site design helps to improve the quality of receiving waters and stabilizes the flow rates of nearby streams, which would minimize erosion and siltation impacts. LID site planning principles in the City’s Municipal Code and Plan Policy SI-10E, combined with applicable NPDES regulations, would minimize changes to drainage patterns, thereby reducing the risk of erosion or siltation resulting from drainage alterations. Resulting impacts would be less than significant.

Mitigation Measures

Implementation of Plan policies and existing regulations would reduce impacts to a less than significant level. Therefore, mitigation is not required.
Table: Thresholds

| Threshold 4: | Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.
| Threshold 5: | Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Impact HWQ-4: With implementation of plan policies and existing regulations, the Plan would not substantially alter drainage patterns or create or contribute runoff that would result in downstream flooding, stormwater drainage exceedances, or increases in polluted runoff. Impacts would be less than significant.

Flooding could occur in Alhambra from intense localized rainstorms and spillover from nearby flood control channels. To protect the community, Los Angeles County maintains and continues to improve storm drainage and flood control facilities, which reduce the threat of flooding in the event of a 100-year flood (Alhambra 2015a). The City of Alhambra, Sewer and Storm Drain Section of the Utilities Division maintains and operates the City’s sanitary sewer collection system, which consists of 1,000 storm drains/catch basins, 2,800 manholes, and seven lift stations, with main sewer lines ranging in size from 4 inches to 36 inches (Alhambra 2017c).

Development facilitated by the Plan would be primarily infill in nature. Therefore, only an incremental expansion in the quantity of net new impervious surfaces is expected as part of future development. Implementation of the following Plan goals and policies would help maximize stormwater infiltration, prevent increased runoff, and minimize potential flooding.

Health and Safety Goals and Policies

**Goal HS-3** Proper management of stormwater to minimize the potential effects of flooding on people and property.

**Policy HS-3A** Minimize injury, loss of life, property damage, and economic and social disruption caused by stormwater, flooding, and other forms of inundation.

**Policy HS-3B** Address site-specific flood issues through improvements to storm drain infrastructure.

**Policy HS-3C** Strengthen the City’s maintenance program for stormwater detention basins, culverts, and storm drains to minimize future flooding events.

Resources Goals and Policies

**Policy R-1E** Maximize stormwater filtration and/or infiltration through use of low-impact development methods.

As discussed in Impact HWQ-1, Plan policies and existing regulations would prevent increases in polluted runoff, thus preventing violations of water quality standards and waste discharge requirements. The Plan goals and policies and existing regulations discussed under Impact HWQ-1, and the Plan goals and policies discussed here in Impact HWQ-4, would prevent substantial increases in runoff, and no on- or off-site flooding, exceedance of the capacity of storm drainage systems.
systems, or substantial additional sources of polluted runoff would occur as result of the Plan. Resulting impacts would be less than significant.

**Mitigation Measures**

Implementation of Plan policies and existing regulations would reduce impacts to a less than significant level. Therefore, mitigation is not required.

<table>
<thead>
<tr>
<th>Threshold 7:</th>
<th>Place housing within a 100-year flood hazard as mapped on a federal flood hazard boundary or flood insurance rate map or other flood hazard delineation map</th>
</tr>
</thead>
<tbody>
<tr>
<td>Threshold 8:</td>
<td>Place within a 100-year flood hazard area structures which would impede or redirect flood flows</td>
</tr>
<tr>
<td>Threshold 9:</td>
<td>Expose people or structures to significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam</td>
</tr>
<tr>
<td>Threshold 10:</td>
<td>Expose people or structures to significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow</td>
</tr>
</tbody>
</table>

**Impact HWQ-5**: Development facilitated by the Plan would not place housing, structures, or people within a 100-year flood zone, expose people or structures to significant risk of loss, injury, or death as a result of failure of a levee or dam or inundation by seiche, tsunami, or mudflow. With implementation of Plan policies, potential flooding impacts would be less than significant.

As shown on Figure 30, no portion of Alhambra lies within a 100- or 500-year floodplain delineated by FEMA (FEMA 2017). Flooding in the City is limited to localized problem areas resulting from inadequate drainage capacity. Local flooding could potentially occur due to ponding caused by intense localized rainstorms and spillover from nearby flood control channels (including the Alhambra Wash and the San Pascual Wash located in the northeastern portion of the City, and the Laguna Channel in the southwest corner of the City) during a 100-year flood, but flood control improvements locally and in the surrounding region have removed Alhambra from the 100-year flood zone (Alhambra 2017b).

Goals and policies included in the Plan would further minimize risks associated with storm flooding. The following Plan goals and policies would help minimize negative impacts from future flooding events, discourage development in flood hazard areas, maintain the City’s stormwater infrastructure, and maximize stormwater infiltration.

**Health and Safety Goals and Policies**

**Goal HS-3** Proper management of stormwater to minimize the potential effects of flooding on people and property.

**Policy HS-3A** Minimize injury, loss of life, property damage, and economic and social disruption caused by stormwater, flooding, and other forms of inundation.

**Policy HS-3B** Address site-specific flood issues through improvements to storm drain infrastructure.
Policy HS-3C  Strengthen the City’s maintenance program for stormwater detention basins, culverts and storm drains to minimize future flooding events.

Resources Goals and Policies

Policy R-1E  Maximize stormwater filtration and/or infiltration through use of low-impact development methods.

Dam failure from local and regional dams would not create flooding in Alhambra. There are two dams north of the City near the base of the San Gabriel Mountains: one at Devil’s Gate Reservoir on the Arroyo Seco six miles north of the City and the other at Eaton Wash Reservoir on Eaton Wash 4.2 miles north of the City (Alhambra 2015a). The City is not located in the inundation areas for either of these two dams. In addition, the City of Alhambra is 22 miles east of the Pacific Ocean, outside of a Tsunami Hazard Area (Los Angeles County 2015). Therefore, impacts related to flooding under the Plan would be less than significant.

Mitigation Measures

Implementation of Plan policies would reduce potential flooding impacts to a less than significant level. Therefore, mitigation is not required.
4.8 Land Use and Planning

This section analyzes the Plan’s consistency with applicable local, regional, and state land use policies. Consistency with the South Coast Air Quality Management Plan (AQMP) is discussed in Section 4.2, Air Quality. Land use compatibility conflicts associated with Plan-facilitated growth are discussed in other sections of this EIR, including sections 4.1, Aesthetics, 4.2, Air Quality, 4.6, Hazards and Hazardous Materials, and 4.9, Noise.

4.8.1 Setting

Alhambra is subject to the land use regulatory plans and policies of two agencies that directly affect local land use planning, as discussed below.

a. Regulatory Agencies

Agencies with direct roles in establishing and implementing land use policy and practice in Alhambra are the Southern California Association of Governments (SCAG) and the City itself.

Southern California Association of Governments

Alhambra is located in the statutory planning area of the Southern California Association of Governments (SCAG). SCAG functions as the federally recognized Metropolitan Planning Organization (MPO) for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties (SCAG Region). The SCAG region has an estimated 2017 population exceeding 19 million in an area of more than 38,000 square miles (SCAG, 2018). As the MPO, SCAG develops long-range regional transportation plans in cooperation with the California Department of Transportation (Caltrans) and the U.S. Department of Transportation (US DOT) and, utilizing much of the same regional data, prepares and/or assists other agencies in developing the state-required regional Sustainable Communities Strategy (SCS); population, housing, and employment growth forecasts; regional transportation improvement programs; regional housing needs allocations (RHNA); and air quality management plans. Although SCAG has no direct land use authority, generalized land use planning consistency between local jurisdictions and SCAG is required by state law for purposes of meeting state-required environmental quality goals and/or for eligibility for a wide range of transportation and other types of intergovernmental grants and funding programs that have long-range positive environmental impacts.

City of Alhambra

The City of Alhambra establishes land use policy and practice in Alhambra through its General Plan, various specific plans, and its Municipal Code.

b. Applicable Plans and Policies

Plans, regulations, and policies of the above agencies that are relevant to the Plan are described on the following pages.
SCAG Plans

Regional Comprehensive Plan

SCAG’s 2008 Regional Comprehensive Plan (RCP) contains a general overview of federal, state, and regional plans applicable to the SCAG Region and serves as a comprehensive planning guide for forecast long-range regional growth through 2035. The primary goals of the RCP are to improve the standard of living, enhance the environmental quality of life, and promote social equity. SCAG member agencies adopted the most recent RCP in 2008 that set broad goals for the SCAG Region and identified strategies for all levels of government to use in their local decision making. The RCP includes sections for each of the 13 SCAG-designated subregions. Alhambra is within the San Gabriel Valley SCAG subregion. The RCP is advisory and does not have direct land use authority over cities and counties. SCAG is in the early stages of a comprehensive update to the RCP.

Regional Transportation Plan/Sustainable Communities Strategy

SCAG’s 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is the companion long-range transportation and sustainability plan to the RCP that looks ahead to 2040 and provides a vision for the future of the regional multi-modal transportation system. The RTP/SCS is a long-range visioning plan that balances the region’s projected future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS charts a course for closely integrating land use and transportation so that the region can accommodate projected growth. It outlines more than $556.5 billion in transportation system investments through 2040. In June 2016, SCAG received its conformity determination from the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA).

AB 32, California’s Global Warming Solutions Act of 2006, gave the California Air Resources Board (CARB) authority over sources of greenhouse gas emissions, including cars and light trucks. SB 375, authored by Senator Darrell Steinberg, was intended to help California achieve GHG reduction goals for cars and light trucks by changing land use patterns in tandem with regional and local transportation planning to generally reduce vehicle miles travelled (VMT) which, in turn, reduces GHG emissions. SB 375 required that the RTP include a Sustainable Communities Strategy (SCS) that demonstrates how the SCAG Region will meet its greenhouse gas (GHG) reduction CARB target. Therefore, there is a direct link between a local general plan being consistent with SCAG’s 2016 RTP/SCS and GHG emission reduction.

The SCAG RTP/SCS vision for 2040 includes more compact development and seamless public transit options, including expanded bus and rail service. In this vision, people live closer to work, school, shopping and other destinations. Their neighborhoods are more walkable and safe for bicyclists. Southern California’s vast transportation network is preserved and maintained in a state of good repair, so that public tax dollars are not expended on costly repairs and extensive rehabilitation. Housing across the region is sufficient and affordable and meets forecasted demands of a growing population, largely due to natural increase.
City of Alhambra Plans and Codes

Alhambra General Plan

The proposed Plan is a comprehensive update of the City’s current General Plan, and would thus replace it in every respect. The proposed Plan would therefore not conflict with goals, policies, or standards established in the City’s current General Plan.

Alhambra Specific Plans

A Specific Plan is a tool for the systematic implementation of a jurisdiction’s General Plan within particular geographic areas in a city. It serves as a link between General Plan policies and proposed development in a particular area. A Specific Plan can also be a good tool for creating a “sense of place” in particular areas, because it addresses issues such as the location and intensity of land uses, public streets, water and sewer improvements, development standards, and implementation within that area.

The City has adopted 10 specific plans to govern development in various parts of Alhambra. Several of these, including Casita de Zen, 100 Bay State Street (Alhambra Walk), Alhambra Fifth and Main (Main Street Collection), and Alhambra Place, are located along the Main Street corridor. The Specific Plan areas are shown in Figure 31. The following is a discussion of each Specific Plan, taken from the Land Use & Community Design chapter of the Plan.

- The Valley Boulevard Corridor Specific Plan (SP-1) was adopted in 1990. The Valley Boulevard Corridor consists of 130 acres along 3.1 miles of Valley Boulevard. SP-1 was designed to guide reuse and new development along the corridor, and provides guidelines to ease traffic congestion, enhance the corridor’s physical appearance, and ensure that new development is sensitive to adjacent land use.

- Alhambra Place (SP-2) was originally approved in 2006 and amended in 2014. It covers the 11-acre block located at the juncture of Garfield Avenue and Main Street. SP-2 consists of a planned, mixed-use development with 260 luxury apartments and 140,000 square feet of commercial, restaurant, and retail space. It also has a parking structure with subterranean and ground-level parking for visitors and upper-level, secured parking for residents.

- Alhambra 5th and Main Specific Plan (SP-3) (Main Street Collection) was adopted in 2006. SP-3 transformed the site from an institutional use (previously the Alhambra Public Library) into a planned, mixed-use development with 86 for-sale condominium units, 8,200 square feet of leasable commercial/office space, and a parking garage.

- Casita de Zen (SP-4) was approved in 2010. It transformed this area along the north side of Main Street into a planned mixed-use development with 94 for-sale condominium units and 5,000 square feet of leasable commercial space. The complex also contains at-grade and subterranean parking spaces.

- 2300 Poplar Specific Plan (SP-5) was approved in 2011. SP-5 allows a 0.66-acre, vacant site to be transformed into a commercial, mixed-use development consisting of 104,000 square feet of self-storage and 4,300 square feet of leasable commercial space. The self-storage component consists of interior-accessible, climate-controlled self-storage units. In addition, when constructed the complex will contain open and covered parking spaces on the ground floor of the building.
Figure 31 Specific Plan Areas

SP-1 Valley Boulevard Corridor Specific Plan
SP-2 Alhambra Walk
SP-3 Alhambra Place
SP-4 Alhambra 5th and Main Specific Plan
SP-5 Casta de Zén
SP-6 2300 Poplar Specific Plan
SP-7 Alhambra Pacific Plaza
SP-8 2500 West Hellman Avenue
SP-9 Acacia and Marengo
SP-10 2400 Fremont
Downtown Specific Overlay
- Alhambra Pacific Plaza (SP-6) was approved in 2011. The project replaces an existing low-density, full-service grocery located at 300 West Main Street, between 3rd and 4th streets. It revitalized the property with a higher-density development that includes 120 condominium units with ground floor retail/grocery and restaurant uses.
- 2500 West Hellman Avenue (SP-7) was approved in 2012, covering approximately 1.25 acres of land. It transformed three older, functionally obsolete retail/commercial structures and a former gasoline service station site into a 135,000 square-foot self-storage development with a customer leasing office and an option to provide an on-site residence for the management.
- Acacia and Marengo (SP-8) was approved in 2012. It transformed an underutilized development site into a planned residential community with 18 attached, three-story townhome dwelling units.
- 2400 Fremont (SP-9) (Midwick Collection) was approved in 2015. It allows a project of up to 70 residential units, including 28 townhomes and 37 new, single-family homes. It retains five existing homes that will be rehabilitated.
- Alhambra Gateway Walk (SP-10) was approved in 2003. It transformed 2.69 acres of blighted, vacant land into a planned residential community with 129 high-end condominiums.

**Alhambra Zoning Ordinance**

The City of Alhambra Zoning Ordinance, contained within the City’s Municipal Code, is one of the primary means of implementing the General Plan. The Zoning Ordinance establishes standards for development of individual properties, including standards regulating allowed uses, setbacks from neighboring properties, and the intensity, height, and appearance of development. State law requires that a city’s Zoning Ordinance be consistent with the City’s General Plan, and also requires that the Zoning Ordinance be revised to reflect the adopted General Plan within a reasonable period of time from its adoption, which is typically one year.

### 4.8.2 Impact Analysis

**a. Methodology and Significance Thresholds**

A land use and planning impact is determined by responding to the following three questions from Appendix G of the 2017 CEQA Handbook:

Would the project:

1. Physically divide an established community?
2. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental impact?
3. Conflict with any applicable habitat conservation plan or natural community conservation plan?

The Plan retains and continues Alhambra’s existing pattern of arterial highways and established communities. The Plan vision specifically includes stable residential neighborhoods and enhanced commercial corridors. Therefore the Plan would not divide an established community and no further analysis of this issue (Threshold 1) is required.
There is no habitat conservation plan or natural community conservation plan within the Plan Area, and none are proposed as part of the Plan. Therefore, no further analysis of this issue (Threshold 3) is required.

In order to determine the Plan’s potential to conflict with any applicable land use plan, policy, or regulation (Threshold 2), the discussion of land use and planning impacts in this section of the EIR analyzes the Plan’s consistency with City and SCAG plans and policies related to land use. Adoption of the Plan would result in a potentially significant land use impact only if the Plan would conflict with one or more applicable land use plans, policies, or regulations of the City or SCAG previously adopted for the purpose of avoiding or mitigating a regionally significant environmental impact. In general, SCAG incorporates well-established city-level general plans in its regional plans and actions. As long as a proposed local general plan is largely consistent with the most recently adopted SCAG plans or policies, adoption of an updated local general plan does not result in environmental impacts that are considered significant. SCAG ultimately has the discretion to determine consistency of the Plan with the policies, plans, and/or programs that fall within that agency’s purview.

b. Project and Cumulative Impacts

| Threshold 2: | Conflict with any applicable land use plan, policy, or regulation with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental impact |

Impact LU-1: BECAUSE THE PLAN AND ITS POLICIES ARE CONSISTENT WITH SCAG’S RCP AND RTP/SCS, THE PLAN WOULD NOT CONFLICT WITH APPLICABLE LAND USE PLANS, POLICIES, OR REGULATIONS ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL IMPACT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

2008 SCAG RCP Land Use Policies

The 2008 RCP has the following chapters, each of which includes goals and outcomes to measure progress toward a more sustainable region (SCAG 2017b):

- Land Use and Housing
- Open Space and Habitat
- Water
- Energy
- Air Quality
- Solid Waste
- Transportation
- Security and Emergency Preparedness
- Economy

Each of the topics listed above, other than Land Use, is addressed in other sections of this EIR. Consistency with the South Coast AQMP is discussed in Section 4.2, Air Quality. Land use compatibility conflicts associated with Plan-facilitated growth are discussed in other sections of this EIR, including sections 4.1, Aesthetics, 4.2, Air Quality, 4.6, Hazards and Hazardous Materials, and 4.9, Noise. Housing is addressed in Section 4.10, Population and Housing. Therefore, the review
below is focused on land use, with the acknowledgement that land use is inherently a major factor in the other listed topics.

Local consistency with RCP land use usually leads to consistency with the other RCP components that are based, to some extent, on underlying current and future land uses. The “Voluntary Local Government Best Practices” relating to local land use are listed on page 21 of the RCP. The discussion below lists applicable voluntary best practices from the RCP, and explains how the Plan relates to each of them.

**LU-4**  
Local governments should provide for new housing, consistent with State Housing Element law, to accommodate their share of forecast regional growth.

**LU-4.1**  
Local governments should adopt and implement General Plan Housing Elements that accommodate housing needs identified through the Regional Housing Needs Assessment (RHNA) process. Affordable housing should be provided consistent with RHNA income category distributions adopted for each jurisdiction. To provide housing, especially affordable housing, jurisdictions should leverage existing state programs such as Housing and Community Development’s (HCD) Workforce Incentive Program and density bonus law and create local incentives (e.g., housing trust funds, inclusionary zoning, tax-increment-financing districts in redevelopment areas and transit villages) and partnerships with non-governmental stakeholders.

The 2013-2021 Housing Element continues the City’s focus on maintenance of its housing stock, and continues programs designed to increase homeownership in the community, as well as to provide incentives for the development of affordable housing. The City will also continue to pursue other programs geared toward meeting the needs of lower-income households and special-needs populations. The Housing Element identifies housing needs in the City and sets forth policies to guide future housing development consistent with General Plan goals and policies. HCD determined the Alhambra 2013-2021 Housing Element in compliance with State Housing Element Law on February 2, 2014. Table 16 reproduces Table 39 from page 73 of the 2013-2021 Housing Element, which indicates there are adequate vacant and underutilized sites to accommodate the RHNA allocation of 1,492 units by 2021. Future RHNA planning cycles will require the City to update its Housing Element for the post-2021 period. Future Housing Element updates through the year 2040 are subject to subsequent CEQA review and beyond the scope of this EIR.

**Table 16 Comparison of Sites Inventory and RHNA**

<table>
<thead>
<tr>
<th></th>
<th>Lower Income</th>
<th>Moderate Income</th>
<th>Above Moderate Income</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>RHNA</td>
<td>604</td>
<td>246</td>
<td>642</td>
<td>1,492</td>
</tr>
<tr>
<td>Proposed Project</td>
<td>0</td>
<td>0</td>
<td>1,187</td>
<td>1,187</td>
</tr>
<tr>
<td>Vacant Properties</td>
<td>0</td>
<td>32</td>
<td>0</td>
<td>32</td>
</tr>
<tr>
<td>Underutilized</td>
<td>1,183</td>
<td>339</td>
<td>0</td>
<td>1,522</td>
</tr>
<tr>
<td>Surplus</td>
<td>+579</td>
<td>+125</td>
<td>+545</td>
<td>0</td>
</tr>
</tbody>
</table>

Source: City of Alhambra 2013
Local governments should take a comprehensive approach to updating their general plans, keeping general plans up-to-date and providing progress reports on updates and implementation, as required by law.

The Plan is an update of the City’s current General Plan. All elements of the City’s General Plan are being updated as part of this project, except for the Housing Element which, as explained above, was last updated more recently, in 2013, and will be required to be updated again before expiration of the current Housing Element cycle in 2021.

Local governments and subregional organizations should develop ordinances and other programs, particularly in the older, more urbanized parts of the region, which will enable and assist in the cleanup and redevelopment of brownfield sites.

Local governments and subregional organizations should develop adaptive reuse ordinances and other programs that will enable the conversion of vacant or aging commercial, office, and some industrial properties to housing and mixed-use with housing.

As stated in Section 2.3.5, “Focus Areas of New Development,” several areas have been identified as focus areas where the private market, non-profits, and/or City-initiated projects would lead to reuse and conversion of properties in response to market demand or for various public and semi-public purposes. These areas are West Main Street, Valley Boulevard, the Garfield Medical Office Corridor, and the Fremont and Mission Regional Commercial/Industrial Hubs.

A recent example of planning for reuse of obsolete commercial areas is the 2500 West Hellman Avenue Specific Plan (SP-7 on Figure 2 of the Plan), which was approved in 2012. SP-7 covers approximately 1.25 acres. It was formerly occupied by three obsolete retail/commercial structures and a former gasoline service station, but was redeveloped into a development consisting of approximately 135,000 square feet of self-storage development, with a customer leasing-office and an option to provide an on-site residence for the management.

The following Plan policy is consistent with RCP voluntary best practices LU-6.3 and LU 6.4:

Policy LU-2D Encourage the assembly and preservation of large land parcels in specific areas (e.g., industrially designated lands) to facilitate economically viable commercial and industrial development and redevelopment

Additionally, the following policies from the City’s Housing Element are also consistent with RCP voluntary best practices LU-6.3 and LU 6.4:

Policy 3.3 Promote mixed-use development where housing is located adjacent to jobs, shopping, services, schools, transportation corridors, and leisure opportunities

Policy 3.4 Identify available infill lots for future housing development opportunities

Policy 3.5 Explore re-use opportunities where appropriate on obsolete commercial or industrial sites

With implementation of these policies, the Plan would be consistent with the SCAG 2008 RCP and this impact would be less than significant.
SCAG 2016 RTP/SCS

The RTP/SCS is a planning and strategy document with a focus on integrating major regional transportation infrastructure investments with land use planning. In the case of cities like Alhambra that are fully developed and largely continuing their existing land uses, development patterns, and transportation infrastructure, the RTP/SCS largely incorporates local land use plans provided to SCAG by local jurisdictions during development of the SCS/RTP.

The 2016 RTP/SCS has foundational policies, which are intended guide the development of member jurisdictions’ land use strategies. They are:

1. Identify regional strategic areas for infill and investment
2. Structure the plan on a three-tiered system of centers development
3. Develop “Complete Communities”
4. Develop nodes on a corridor
5. Plan for additional housing and jobs near transit
6. Plan for changing demand in types of housing
7. Continue to protect stable, existing single-family areas
8. Ensure adequate access to open space and preservation of habitat
9. Incorporate local input and feedback on future growth.

The Plan does not conflict with these policies for the following reasons. Alhambra is already a completely urbanized community, and any future development will represent infill and reinvestment in the City, making it consistent with foundational policy 1. The Plan emphasizes bicycle connections and pedestrian-oriented focus areas, increasing access to open space (see foundational policy 8). The Plan also proposes focus areas and activity nodes to help shape and distribute new development. These focus areas would encourage new development near transit, making it consistent with foundational policies 2 and 5, and would be “nodes on a corridor,” as suggested by foundational policy 4. The 2016 RTP/SCS states that it supports the creation of mixed-use “complete communities” through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other. The Plan encourages new development in geographically compact focus areas, which would encourage these concentrations of different uses in close proximity to each other, and the Plan would thus also be consistent with foundational policy 3 to develop “complete communities.”

The Plan does not involve a major local land use plan change compared to the land use plan provided to SCAG, and would continue the general pattern of the City’s existing land uses, with emphases on improving the livability and pedestrian-level appeal of existing corridors and commercial clusters, largely preserving existing residential neighborhoods and supporting gradual market-initiated redevelopment of underutilized and obsolete properties. Consistent with foundational policy 6, the Plan would accommodate for future housing demand patterns in which most new housing is expected to be multi-family housing and average household size is expected to decrease. See sections 2.3.6, Residential and Employment Growth, and 4.10, Population and Housing, for further explanation of these trends. The additional two new land use designations, Medical Office and Educational, were created to generally reflect and enhance existing uses. Plan Goals LU-1, “Preservation of the character of existing single-family neighborhoods” and LU-7, “Maintenance and development of vital, attractive, and functional corridors and activity nodes” and their respective implementing policies are similar to the RTP/SCS foundational policies 3 and 7.
Lastly, the Plan was developed based on an extensive program of public outreach and participation, as explained in the Plan, consistent with foundational policy 9. Based on these facts, adoption of the Plan would not hinder 2016 RTP/SCS foundational policies.

City of Alhambra Zoning Ordinance

State law requires that a city’s zoning ordinance be consistent with the city’s general plan. Adoption of the Plan would thus require a review of the City’s Zoning Ordinance to assure consistency with the Plan. Aspects of the Zoning Ordinance that would require review include the following:

- Zoning Ordinance regulations pertaining to land use, density/intensity, design and development, and other pertinent topics.
- The Zoning Map, which would need to be revised to be consistent with the proposed General Plan Land Use Plan, incorporating any new land use designations, such as the proposed Medical Office designation.
- Zoning Ordinance regulations pertaining to minimum or maximum densities, which would need to be revised to reflect the proposed minimum and maximum density requirements of the Plan shown in Table 4, Land Use Density/Intensity in Section 2, Project Description, of this EIR.
- The Zoning Ordinance would also need to be reviewed for consistency with any other design and development recommendations in the Plan.

State law also requires that the Zoning Ordinance be revised to reflect the adopted General Plan within a reasonable period of time from its adoption, which is typically one year. Because the uses proposed in the Plan are generally consistent with existing uses, land use designations, and zoning, inconsistencies would be generally limited in most areas. Once the Zoning Ordinance has been revised, these inconsistencies would be resolved.

City of Alhambra Specific Plans

The City has Specific Plans for several areas of Alhambra. Specific plans are generally more limited in their scope than those authorized by the State Government Code. Principally, they are more specific than the underlying zoning requirements in their definition of permitted land uses and development standards to reflect the unique characteristics of their planning area. Specific Plan areas are listed and described in Section 4.8.1b, and their location is shown in Figure 31. Seven out of ten of these Specific Plans have already been developed with their intended uses. Five of them are mixed use development, including both residential and commercial components. Others include a self-storage development (SP-7) and purely residential projects (SP-8 and SP-9). Five of them (SP-2 through SP-5, and SP-7) are located on or near the Main Street corridor in Downtown Alhambra. Another two (SP-9 and SP-6) are located just off of Main Street near Auto Row. The Plan would not conflict with any of these specific plans because it would not introduce or encourage any development in the vicinity of these specific plan areas that would be inconsistent with the uses that have either already been developed or could be developed in these areas.

The largest of the City’s specific plans is the Valley Boulevard Corridor Specific Plan (SP-1), covering 130 acres along 3.1 miles of Valley Boulevard. SP-1 was designed to guide reuse and new development along the corridor and provides guidelines to ease traffic congestion, enhance the corridor’s physical appearance, and ensure that new development is sensitive to adjacent land use. The Plan would complement these guidelines, since it encourages new development in pedestrian-
oriented nodes on Valley that would include improved streetscape design, which would help improve the corridor’s physical appearance while accommodating high-quality reuse and new development.

Although the Plan would be generally consistent with the City’s existing specific plans, upon adoption of the Plan, the City would review its currently adopted specific plans and revise them where necessary to reflect changes made in the Plan, such as land use, density/intensity, design, and development. State law requires all Area and Specific Plans to be consistent with the General Plan. As with the Zoning Ordinance, the statutes allow a “reasonable” time for these modifications, which the courts have generally interpreted to be one year from the date of General Plan adoption. Because Specific Plans are typically designed to refine the uses set forth in the General Plan and provide further guidance for development in the area, conflicts would be limited, although there could be temporary conflicts between the Specific Plans and the proposed General Plan.

As discussed within this impact discussion, implementation of the Plan would be generally consistent with applicable adopted plans, regulations, or policies. Therefore, impacts associated with potential inconsistencies with applicable land use plans for the city would be less than significant.

**Mitigation Measures**

The Plan would not conflict with local and regional plans, including SCAG’s RCP and RTP/SCS; or the City’s General Plan, Municipal Code, or specific plans. Mitigation is not required.
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4.9 Noise

This section describes existing ambient noise conditions within Alhambra and analyzes the potential noise-related impacts from implementation of the Plan. Impacts related to noise from construction, building operations, traffic, and flight operations are addressed.

4.9.1 Setting

a. Overview of Sound Measurement

Noise is defined as unwanted sound. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dBA level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA, and a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dBA greater than the ambient noise level to be judged as twice as loud. In general, a 3 dBA change in the ambient noise level is noticeable, while 1 to 2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40 to 50 dBA, while areas adjacent to arterial streets are typically in the 50 to 60 or more dBA range. Normal conversational levels are usually in the 60 to 65 dBA range and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels from point sources, such as those from individual pieces of machinery, typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from the noise source. Noise levels from lightly traveled roads typically attenuate at a rate of about 4.5 dBA per doubling of distance. Noise levels from heavily traveled roads typically attenuate at about 3 dBA per doubling of distance. Noise levels may also be reduced by intervening structures. Generally, a single row of buildings between the receptor and the noise source can reduce noise levels by about 5 dBA, while a solid wall or berm can reduce noise levels by 5 to 10 dBA (Federal Transit Administration [FTA] 2006). The manner in which homes in California are constructed generally provides a reduction of exterior-to-interior noise levels of approximately 20 to 25 dBA with closed windows (FTA 2006).

The duration of noise is important because sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a one-hour period. Lmax is the highest RMS (root mean squared) sound pressure level within the measurement period, and Lmin is the lowest RMS sound pressure level within the measurement period.

The time period in which noise occurs is also important since nighttime noise tends to disturb people more than daytime noise. Community noise is usually measured using the Day-Night Average
Level (Ldn), which is the 24-hour average noise level with a 10-dBA penalty for noise occurring during nighttime (10 p.m. to 7 a.m.) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5 dBA penalty for noise occurring from 7 p.m. to 10 p.m. and a 10 dBA penalty for noise occurring from 10 p.m. to 7 a.m.. The Ldn and CNEL typically do not differ by more than 1 dBA. In practice, CNEL and Ldn are often used interchangeably.

b. Sensitive Receptors
Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Residences, hospitals, schools, guest lodging, libraries, and religious institutions are most sensitive to noise intrusion and therefore have more stringent noise exposure targets than commercial or recreational uses that are not subject to impacts such as sleep disturbance. Most residential noise-sensitive uses are located in relatively quiet areas lacking major noise sources. However, residences and other noise-sensitive receptors located along major arterial roadways, highways, and railroad lines may experience elevated noise levels.

c. Sources of Noise
The predominant source of noise in Alhambra, as in most communities, are motor vehicles on City roadways. Other sources of noise include railroad operations, aircraft, and stationary operations from commercial and industrial uses, as described below.

Roadways
Noise levels are generally highest along or adjacent to major roadways. Motor vehicle noise is of concern because it is characterized by a high number of individual events, which often create a sustained noise level, and its proximity to areas sensitive to noise exposure. The City’s roadway facilities include regional highways and other arterials, and collector and local streets. Two major highways in the City include the San Bernardino Freeway (I-10), which bisects the southern portion of the City, and the Long Beach Freeway (I-710). However, the I-710 is located in the southwest corner of the City and has lower traffic volumes than the I-10, and therefore has a lower impact on the overall noise environment of the City than the I-10. Major arterials in the City include Fremont Avenue, Atlantic Boulevard, Garfield Avenue, Valley Boulevard, Mission Road, and Main Street.
Noise levels along all City roadways are affected by a number of traffic characteristics, including average daily traffic (ADT), percentage of trucks, vehicle speed, time distribution of traffic, and gradient of the roadway.

Railroads
The Union Pacific Railroad line passes through the center of the City along the south side of Mission Boulevard in an east/west direction. However, the railroad line is located in a trench below surrounding grade throughout the City, except at its far eastern end, along Mission Road, where the tracks return to grade. In this area, however, the tracks are currently being lowered to below grade as part of the San Gabriel Trench project, which is being carried out by the Alameda Corridor-East Construction Authority. Final project completion is scheduled for early 2018 (Alameda Corridor-East Construction Authority 2017). The lowering of the railroad line substantially reduces noise impacts on adjacent land uses due to both the shielding of railroad noise and elimination of at-grade street crossings.
Aircraft

There are no airports located in or near the City. The nearest airport is located in the City of El Monte approximately four miles east of Alhambra. As with most municipalities located in an urban area, the City is subject to occasional noise intrusion from overhead aircraft. However, aircraft operations are intermittent by nature, and are not a major source of noise in the City.

Commercial and Industrial Operations

Commercial and industrial operations can be substantial sources of noise, depending on the specific type of use and hours of operation. Existing commercial and industrial development in Alhambra is located primarily along Valley Boulevard, Garfield Avenue between Main Street and the I-10, Palm Avenue between Commonwealth Avenue and Mission Road, and East Main Street. Typical commercial and industrial noise sources include loading dock operations, parking lot activity, on-site equipment (including heating and air conditioning), heavy machinery, and heavy truck idling. Other stationary noise sources of concern typically include generators, pumps, air compressors, and outdoor speakers. These are often associated with trucking companies, tire shops, auto mechanic shops, metal shops, shopping centers, drive-up windows, and car washes. Noise-generating commercial uses are generally separated from noise-sensitive land uses by distance, topography, and other barriers. Because of the lack of mining and similar heavy industrial facilities in Alhambra, ground-borne noise and vibration associated with commercial and industrial operations in the City are limited.

d. Existing Noise Levels

In order to characterize the noise environment in Alhambra, noise levels were measured at 40 locations throughout the City in December 2015 and January 2016. Table 17 shows the measured noise levels in Alhambra, while Figure 32 shows the locations and corresponding noise level measurements. Noise levels are generally highest along or adjacent to major roadways and the highest noise level (72.2 dBA Leq) was measured along North Fremont Avenue between West Main Street and Poplar Boulevard (Site No. 25).

**Table 17  Current Measured Ambient Noise Levels**

<table>
<thead>
<tr>
<th>Site No.</th>
<th>Location</th>
<th>Leq</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Intersection of S. Garfield Avenue and E. Main Street</td>
<td>70.1</td>
</tr>
<tr>
<td>2</td>
<td>2nd Street, between W. Commonwealth Avenue and W. Main Street</td>
<td>57.4</td>
</tr>
<tr>
<td>3</td>
<td>E. Main Street, between S. 5th Street and S. 4th Street</td>
<td>68.7</td>
</tr>
<tr>
<td>4</td>
<td>S. Atlantic Boulevard, between W. Commonwealth Avenue and W. Beacon Street</td>
<td>69.6</td>
</tr>
<tr>
<td>5</td>
<td>W. Main Street, between Electric Avenue and S. Marengo Avenue</td>
<td>67.3</td>
</tr>
<tr>
<td>6</td>
<td>S. Raymond Avenue, between Pepper Street and W. Main Street</td>
<td>65.5</td>
</tr>
<tr>
<td>7</td>
<td>S. Palm Avenue, between Chestnut Street and W. Mission Road</td>
<td>63.0</td>
</tr>
<tr>
<td>8</td>
<td>S. Meridian Avenue, between W. Commonwealth Avenue and Poplar Boulevard</td>
<td>63.2</td>
</tr>
<tr>
<td>9</td>
<td>S. Fremont Avenue, between W. Shorb Street and Front Street</td>
<td>67.2</td>
</tr>
<tr>
<td>10</td>
<td>S. Atlantic Boulevard, between W. San Marino Avenue and Front Street</td>
<td>70.4</td>
</tr>
<tr>
<td>11</td>
<td>S. Garfield Avenue, between Palmetto Drive and E. Los Higos Street</td>
<td>71.0</td>
</tr>
<tr>
<td>12</td>
<td>S. Almansor Street, between E. Mission Road and E. Commonwealth Avenue</td>
<td>62.4</td>
</tr>
<tr>
<td>13</td>
<td>S. Almansor Street, between Corto Street and Park Street</td>
<td>63.9</td>
</tr>
<tr>
<td>Site No.</td>
<td>Location</td>
<td>Leq</td>
</tr>
<tr>
<td>---------</td>
<td>--------------------------------------------------------------------------</td>
<td>------</td>
</tr>
<tr>
<td>14</td>
<td>E. Los Higos Street, between S. Sierra Vista Avenue and S. Almansor Street</td>
<td>63.1</td>
</tr>
<tr>
<td>15</td>
<td>Intersection of S. Freemont Avenue and W. Norwood Place</td>
<td>69.8</td>
</tr>
<tr>
<td>16</td>
<td>Elm Street, between W. Hellman Avenue and W. Ross Avenue</td>
<td>67.1</td>
</tr>
<tr>
<td>17</td>
<td>W. Hellman Avenue, between S. Palm Avenue and Park Access Road</td>
<td>63.7</td>
</tr>
<tr>
<td>18</td>
<td>S. Marguerita Avenue, between W. Valley Boulevard and W. Glendon Way</td>
<td>59.2</td>
</tr>
<tr>
<td>19</td>
<td>E. Ramona Road, between S. Chapel Avenue and S. Sierra Vista Avenue</td>
<td>67.6</td>
</tr>
<tr>
<td>20</td>
<td>E. Hellman Avenue, between S. Almansor Street and N. Sierra Vista Street</td>
<td>66.3</td>
</tr>
<tr>
<td>21</td>
<td>E. Valley Boulevard, between S. Granada Avenue and S. Vega Street</td>
<td>68.9</td>
</tr>
<tr>
<td>22</td>
<td>S. Garfield Avenue, between E. Norwood Place and W. Valley Boulevard</td>
<td>71.9</td>
</tr>
<tr>
<td>23</td>
<td>Intersection of W. Shorb Street and S. Atlantic Boulevard</td>
<td>67.0</td>
</tr>
<tr>
<td>24</td>
<td>S. 6th Street, between W Shorb Street and W. San Marino Avenue</td>
<td>67.4</td>
</tr>
<tr>
<td>25</td>
<td>N. Fremont Avenue, between W. Main Street and Poplar Boulevard</td>
<td>72.2</td>
</tr>
<tr>
<td>26</td>
<td>N. Palm Avenue, between W. Alhambra Road and Larch Street</td>
<td>62.4</td>
</tr>
<tr>
<td>27</td>
<td>N. Atlantic Boulevard, between Spruce Street and Pine Street</td>
<td>68.5</td>
</tr>
<tr>
<td>28</td>
<td>Intersection of Huntington Drive and Story Place</td>
<td>67.4</td>
</tr>
<tr>
<td>29</td>
<td>Intersection of N. Chapel Avenue and Elgin Street</td>
<td>60.6</td>
</tr>
<tr>
<td>30</td>
<td>Winthrop Drive, between Balzac Street and Westboro Avenue</td>
<td>66.1</td>
</tr>
<tr>
<td>31</td>
<td>Siwanoy Drive, north of Hagen Drive intersection</td>
<td>58.8</td>
</tr>
<tr>
<td>32</td>
<td>S. Meridian Avenue, between W. Mission Road and Concord Avenue</td>
<td>67.2</td>
</tr>
<tr>
<td>33</td>
<td>Midvale Place, between west and east intersections of Concord Avenue</td>
<td>62.0</td>
</tr>
<tr>
<td>34</td>
<td>N. Stoneman Avenue, between E. Pine Street and Huntington Drive</td>
<td>57.6</td>
</tr>
<tr>
<td>35</td>
<td>E. Commonwealth Avenue, between S. Garfield Avenue and S. Chapel Avenue</td>
<td>59.7</td>
</tr>
<tr>
<td>36</td>
<td>Intersection of W. Garvey Avenue and Carlos Avenue</td>
<td>70.7</td>
</tr>
<tr>
<td>37</td>
<td>Intersection of S. Fremont Avenue and Loma Vista Drive</td>
<td>66.0</td>
</tr>
<tr>
<td>38</td>
<td>Intersection of Garvey Avenue and S. Electric Avenue</td>
<td>69.5</td>
</tr>
<tr>
<td>39</td>
<td>Charnwood Avenue, north of the W. Hellman Avenue intersection</td>
<td>66.5</td>
</tr>
<tr>
<td>40</td>
<td>N. Hidalgo Avenue, between E. McLean Street and E. Alhambra Road</td>
<td>56.2</td>
</tr>
</tbody>
</table>

No. = Number.

1 See Figure 32 for noise measurement locations and Appendix E for noise data. Noise Measurements were taken in December 2015 and January 2016.
Figure 32 Noise Measurement Locations

Map of noise measurement locations within the Alhambra City Boundary.
e. Existing Noise Contours

Existing roadway noise levels were also quantified using the United States Department of Housing and Urban Development (HUD) Day/Night Noise Level (DNL) Calculator, based on ADT data obtained from a City-wide traffic study conducted by KOA Corporation in August 2017. The HUD DNL Calculator noise level estimates are based on traffic volume, vehicle mix, and vehicle speed to estimate roadway noise levels in CNEL (dBA) and generate roadway noise contours. Noise contours represent lines of equal noise exposure, just as the contour lines on a topographic map represent lines of equal elevation. The 60 dBA CNEL roadway contour was calculated using the HUD DNL Calculator for each modeled roadway and an attenuation rate of 4.5 dBA per doubling of distance was used to extrapolate the 65 dBA, 70 dBA, and 75 dBA CNEL noise contours. Roadway noise level estimates do not account for intervening barriers or topography that may shield individual receptors from the noise source. Therefore, the noise contours depicted in this section represent a reasonable, conservative worst-case estimate of noise levels and do not represent a specific estimate of sound levels at any particular location in the City. Refer to Appendix E for HUD DNL Calculator model output sheets.

The results of this noise contour modeling are depicted in Figure 33, a map of existing traffic noise contours along the roadways that are the major source of noise in Alhambra. As shown, the I-10 carries, by far, the most traffic through the area, and consequently is the greatest contributor to noise within the City. Other roadways in and around Alhambra that carry sufficient traffic to produce audible noise at a substantial distance include I-710, Fremont Avenue, Atlantic Boulevard, Garfield Avenue, Main Street, Mission Road, and Valley Boulevard. The contour map also shows that noise levels exceed 60 dBA CNEL along all modeled roadways and generally reflect the measured noise levels shown in Table 17 and Figure 32. Comparing modeled noise contours to the City’s exterior noise standards shown in Table 18 under Regulatory Setting reveals that land uses in close proximity to these roads, such as residences, may currently be exposed to noise levels in exceedance of the City’s standards.

f. Regulatory Setting

Alhambra General Plan

The State of California requires each City and County to adopt a Noise Element as part of its General Plan. Such Noise Elements must contain a Land Use/Noise Compatibility Matrix. The objective of noise compatibility guidelines is to provide the community with a means of judging the noise environment that it deems to be generally acceptable. A recommended (but not mandatory) matrix is presented in the “Guidelines for the Preparation and Content of Noise Elements of the General Plan” (Department of Health Services 2003). The City of Alhambra Land Use/Noise Compatibility Matrix in the General Plan Noise Element is based on and is similar to the California Land Use/Noise Compatibility Matrix. The matrix is used to determine whether a proposed new use would be compatible with the ambient noise environment in which it is proposed as well as whether or not the proposed new use would create noise compatibility conflicts with established uses. The compatibility table, shown in Figure 34, illustrates the ranges of community noise exposure in terms of what is “normally acceptable,” “conditionally acceptable,” “normally unacceptable,” and “clearly unacceptable.” For the most sensitive uses such as residential, hotels, motels, schools, medical facilities, and places of worship, 60 dBA CNEL is the maximum normally acceptable exterior level. The normally acceptable noise exposure for outdoor activity is 70 dBA CNEL for playgrounds and neighborhood parks.
Figure 33 Existing Roadway Noise Contours

Alhambra City Boundary
70 dBA CNEL Contour
65 dBA CNEL Contour
60 dBA CNEL Contour

Contours do not reflect barriers or other site specific conditions and, therefore, may differ from actual measured levels shown on Figure 26.

Basemap data provided by Esri and its licensors & 2018.
### Figure 34 Land Use/Noise Compatibility Matrix for Community Noise Environments

<table>
<thead>
<tr>
<th>LAND USE CATEGORY</th>
<th>COMMUNITY NOISE EXPOSURE</th>
<th>Ldn or CNEL, dBA</th>
</tr>
</thead>
<tbody>
<tr>
<td>RESIDENTIAL - LOW DENSITY</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SINGLE FAMILY, DUPLEX,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>MOBILE HOMES</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RESIDENTIAL - MULTI-FAMILY</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TRANSIENT LODGING - MOTELS, HOTELS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SCHOOLS, LIBRARIES, CHURCHES, HOSPITALS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NURSING HOMES</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AUDITORIUMS, CONCERT HALLS, AMPHITHEATRE</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SPORTS ARENA, OUTDOOR SPECTATOR SPORTS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PLAYGROUNDS, NEIGHBORHOOD PARKS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GOLF COURSES, RIDING STABLES, WATER RECREATION, CEMETERIES</td>
<td></td>
<td></td>
</tr>
<tr>
<td>OFFICE BUILDINGS, BUSINESS COMMERCIAL AND PROFESSIONAL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>INDUSTRIAL, MANUFACTURING, UTILITIES, AGRICULTURE</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| **NORMALLY ACCEPTABLE** Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements. |
| **NORMALLY UNACCEPTABLE** New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. |
| **CONDITIONALLY ACCEPTABLE** New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. |
| **CLEARLY UNACCEPTABLE** New construction or development should generally not be undertaken. |
Denotation of a land use as “normally acceptable” implies that the highest noise level in that exposure level is the maximum desirable for existing or conventional construction that does not incorporate any special acoustical treatment. In general, evaluation of land use that falls into the “normally acceptable,” “conditionally acceptable,” or “normally unacceptable” noise environments should analyze other potential factors that would affect the noise environment. These include consideration of the types of noise source, the sensitivity of the noise receptor, the noise reduction likely to be provided by structures, and the degree to which the noise source may interfere with speech, sleep, or to other activities characteristic of the land use. Generally, the City’s Land Use/Noise Compatibility Matrix is used as a guide to define where placement of certain land uses is considered acceptable. The existing Alhambra Noise Element also contains policies to maintain an acceptable noise environment in the City.

**Alhambra Municipal Code**

The City also implements and enforces noise control through its Municipal Code. Chapter 18.02, *Noise and Vibration Control Regulations*, sets both daytime and nighttime sound level limits for residential and commercial zones; prohibits any person or property owner in the City from creating excessive, impulsive, or intrusive noise or vibration that annoys or disturbs noise-sensitive receptors; and sets forth permitted hours for construction activities and property maintenances activities. The City’s permitted average sounds levels for residential, commercial, and mixed-use zones are shown in Table 18.

**Table 18  Sound Level Limits**

<table>
<thead>
<tr>
<th>Zone</th>
<th>Time</th>
<th>Noise Level Limit (dBA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>7 a.m. to 10 p.m.</td>
<td>55</td>
</tr>
<tr>
<td></td>
<td>10 p.m. to 7 a.m.</td>
<td>50</td>
</tr>
<tr>
<td>Commercial</td>
<td>Anytime</td>
<td>70</td>
</tr>
<tr>
<td>Mixed Use</td>
<td>Anytime</td>
<td>60</td>
</tr>
</tbody>
</table>

Source: City of Alhambra 2015; City of Alhambra 2017.

Section 18.02.060, *Exemptions*, of the Municipal Code specifies the following construction-related noise standard:

The following activities shall be exempted from the provisions of this chapter:

(C) Noise sources associated with or vibration created by construction, repair, remodeling or grading of any real property or during authorized seismic surveys, provided the activities do not take place between the hours of 7 p.m. and 7 a.m. on weekdays including Saturday, or at any time on Sunday or a federal holiday, and provided any vibration created does not endanger the public health, welfare and safety.
4.9.2 Impact Analysis

a. Methodology and Significance Thresholds

The analysis of noise impacts focuses upon the Plan’s impact to surrounding noise-sensitive land uses and the impact of existing noise sources upon plan area residents. The Plan would result in potentially significant impacts if development facilitated by the Plan would result in substantial adverse physical impacts associated with any of the following conditions/thresholds:

1. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies
2. Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels
3. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project
4. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project
5. 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, exposure of people residing or working in the project area to excessive noise levels
6. For a project within the vicinity of a private airstrip, exposure of people residing or working in the project area to excessive noise levels

As discussed in Section 4.6, Hazards and Hazardous Materials, the airport closest to the City of Alhambra is the El Monte Airport, located approximately four miles east of the eastern City limits in El Monte. Because no portion of Alhambra is within two miles of an airport or private airstrip facility, potential impacts associated with aircraft operations (Thresholds 5 and 6 listed above) are not discussed in this section.

The applicable standards and thresholds established in City’s General Plan and Noise Ordinance are described above in Regulatory Setting. However, this analysis uses the FTA’s Transit Noise and Vibration Impact Assessment (2006), thresholds to determine potential excessive groundborne vibration or noise generated by future development under the Plan. The FTA sets the following thresholds for vibration:

- 65 VdB where low ambient vibration is essential for interior operations, such as hospitals and recording studios
- 72 VdB for residences and buildings where people normally sleep, including hotels
- 75 VdB for institutional land uses with primary daytime use, such as churches or schools
- 100 VdB for physical damage to buildings.

Traffic noise modeling was conducted using the HUD DNL Calculator to determine potential increases in roadway noise generated by development facilitated by the Plan. Noise contours were created for the purposes of defining a “significant” increase in traffic noise per the FTA recommendations, which are summarized in Table 19.
### Table 19  Significance of Changes in Operational Roadway Noise Exposure

<table>
<thead>
<tr>
<th>Existing Noise Exposure (dBA LDn or Leq)</th>
<th>Significant Impact (dBA LDn or Leq)</th>
</tr>
</thead>
<tbody>
<tr>
<td>45-49</td>
<td>7</td>
</tr>
<tr>
<td>50-54</td>
<td>5</td>
</tr>
<tr>
<td>55-59</td>
<td>3</td>
</tr>
<tr>
<td>60-64</td>
<td>2</td>
</tr>
<tr>
<td>65-74</td>
<td>1</td>
</tr>
<tr>
<td>75+</td>
<td>0</td>
</tr>
</tbody>
</table>

dBA = A-weighted sound pressure level, LDn = Day-Night average level, Leq = equivalent noise level

Source: FTA 2006

### b. Project and Cumulative Impacts

<table>
<thead>
<tr>
<th>Threshold 4:</th>
<th>A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Threshold 2:</td>
<td>Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels</td>
</tr>
</tbody>
</table>

**Impact N-1:** *Construction-related activities associated with individual projects facilitated by the Plan would intermittently generate temporary construction noise levels and ground-borne vibration near noise-sensitive receptors in the City. However, such development facilitated by the Plan would comply with Plan policies for noise impacts, and adherence to the City’s Municipal Code Section 18.02.060 would limit construction activity to daytime hours and regulate impacts from groundborne vibration. Therefore, this impact would be less than significant.*

Residences and other noise-sensitive land uses adjacent to potential development would be the most affected by construction noise associated with individual projects facilitated by the Plan. Since there are no specific plans or time scales for individual development projects, it is not possible to determine exact noise levels, locations, or time period for construction. However, construction noise would be highest and of the longest duration in areas where more future development and redevelopment is anticipated to occur, such as the focus areas shown in Figure 3. For example, West Main Street and Valley Boulevard may undergo considerable enhancement over the life of the Plan. In addition, the Plan envisions a Garfield Avenue medical office corridor and regional commercial/industrial hubs in areas around Fremont Avenue and Mission Road, which would facilitate future development in these areas.

Most of the time construction noise impacts result when construction activities occur during noise-sensitive times of the day (early morning, evening, or nighttime hours), when construction occurs in areas immediately adjacent to noise sensitive land uses, or when the duration of construction extends over long periods of time. Major noise-generating construction activities could include demolition activities, site grading and excavation, paving, and landscaping. These activities could occur in areas immediately adjacent to existing noise-sensitive receptors or future receptors developed within the City.
The highest construction noise levels would be generated during grading and excavation, with lowest levels occurring during construction. Large earth-moving equipment, such as graders, scrapers, and bulldozers, generate maximum noise levels of 90 to 95 dBA at a distance of 25 feet. Table 20 presents the noise levels generated by common types of construction equipment. Typical hourly, average, construction-generated noise levels are about 85 to 90 dBA when measured at a distance of 25 feet from the site during busy construction periods. These noise levels drop off at a rate of about 6 dBA for each doubling of distance between the noise source and the receptor. In addition, intervening structures or terrain would also attenuate noise and reduce levels.

### Table 20 Typical Noise Levels Generated by Construction Equipment

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Type</th>
<th>Typical Lmax (dBA) Distances from the Source</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>25 Feet</td>
</tr>
<tr>
<td>Air Compressor</td>
<td>Stationary</td>
<td>87</td>
</tr>
<tr>
<td>Backhoe</td>
<td>Mobile</td>
<td>86</td>
</tr>
<tr>
<td>Compactor (ground)</td>
<td>Mobile</td>
<td>89</td>
</tr>
<tr>
<td>Concrete Mixer</td>
<td>Stationary</td>
<td>91</td>
</tr>
<tr>
<td>Dump Truck</td>
<td>Mobile</td>
<td>82</td>
</tr>
<tr>
<td>Excavator</td>
<td>Mobile</td>
<td>87</td>
</tr>
<tr>
<td>Flatbed Truck</td>
<td>Mobile</td>
<td>80</td>
</tr>
<tr>
<td>Front-end Loader</td>
<td>Mobile</td>
<td>85</td>
</tr>
<tr>
<td>Generator</td>
<td>Stationary</td>
<td>87</td>
</tr>
<tr>
<td>Grader</td>
<td>Mobile</td>
<td>89</td>
</tr>
<tr>
<td>Paver</td>
<td>Mobile</td>
<td>95</td>
</tr>
<tr>
<td>Pickup Truck</td>
<td>Mobile</td>
<td>81</td>
</tr>
<tr>
<td>Pneumatic Tools</td>
<td>Stationary</td>
<td>91</td>
</tr>
<tr>
<td>Roller</td>
<td>Mobile</td>
<td>86</td>
</tr>
<tr>
<td>Saw</td>
<td>Stationary</td>
<td>76</td>
</tr>
<tr>
<td>Warning Horn</td>
<td>Stationary</td>
<td>89</td>
</tr>
<tr>
<td>Welder/Torch</td>
<td>Stationary</td>
<td>80</td>
</tr>
</tbody>
</table>

Source: FHWA 2006

Noise levels anticipated over temporary periods of time from construction activities associated with development facilitated by the Plan would exceed the existing ambient noise at noise-sensitive receptors adjacent to potential development sites. In addition, construction activities may last for extended periods of time, which would generate sound levels in excess of ambient noise in the City.

Vibration from construction activities could also have an impact on nearby noise-sensitive land uses. The FTA’s *Transit Noise and Vibration Impact Assessment* (2006) sets a 72 VdB threshold for frequent events affecting residences and buildings where people normally sleep and a 100 VdB threshold for minor cosmetic damage to fragile buildings (vibration levels below 100 VdB produce no damage to buildings). The primary sources of man-made vibration during construction are blasting, grading, pavement breaking and demolition. The primary vibratory source during construction in the City would likely be large bulldozers used to demolish existing structures and
large trucks loaded with supplies and debris. Table 21 identifies vibration velocity levels for the common types of equipment that could be used in the City during construction. As shown in Table 21, typical bulldozer or loaded truck activities generate an approximate vibration level of 58 to 87 VdB at a distance of 25 feet. As such, existing and future residences located 25 feet from potential future construction facilitated by the Plan may intermittently be disturbed by vibration noise. However, vibration levels are not anticipated to exceed 100 VdB, which can cause minor damage in fragile buildings.

### Table 21  Vibration Source Levels for Construction Equipment

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Approximate VdB</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>25 Feet</td>
</tr>
<tr>
<td>Large Bulldozer</td>
<td>87</td>
</tr>
<tr>
<td>Loaded Trucks</td>
<td>86</td>
</tr>
<tr>
<td>Jackhammer</td>
<td>79</td>
</tr>
<tr>
<td>Small Bulldozer</td>
<td>58</td>
</tr>
</tbody>
</table>

Vibration levels assume an attenuation rate of 6 VdB per doubling of distance.
Source: FTA 2006

The City has adopted specific standards for construction and vibration noise under Title 18 Community Noise and Vibration Control, Chapter 18.02 Noise and Vibration Control Regulations. Section 18.02.060(C) of the Alhambra Municipal Code specifically exempts noise sources associated with or vibration created by construction, repair, remodeling, or grading of any real property or during authorized seismic surveys, provided that such activities do not take place between the hours of 7 p.m. and 7 a.m. on weekdays, including Saturday, or at any time on Sunday or a federal holiday, and provided the vibration created does not endanger the public health, welfare, and safety. These restrictions on hours of construction would keep any such construction activities exceeding 72 VdB at the nearest sensitive receptor from interfering with people’s sleep. In addition, construction would not exceed the 100 VdB threshold and damage fragile buildings.

The Health and Safety Chapter of the Plan also includes the following policies that would aim to reduce impacts associated with construction activity.

**Policy HS-6A**  Avoid or reduce excessive noise impacts on noise-sensitive receptors through land use planning, review of new development proposals, and physical interventions such as noise insulation in building design, setbacks, or noise barriers when necessary.

**Policy HS-6B**  Comply with and enforce applicable City Municipal Code related to noise.

**Policy HS-6E**  Establish and maintain coordination among City departments and other relevant agencies involved in noise abatement.

Compliance with Alhambra’s Municipal Code and Policies in the Health and Safety Chapter listed above would limit construction hours and reduce construction-related noise and vibration impacts to a less than significant level.
Mitigation Measures

The City’s Municipal Code and Plan policies would address potentially significant noise and vibration activity associated with development under the Plan. Mitigation beyond compliance with the permitted construction hours in the City’s Municipal Code and implementation of Plan policies is not required.

| Threshold 1: | Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies |

Impact N-2: Traffic generated by new development facilitated by the Plan would increase citywide roadway noise levels and result in an increase in ambient noise levels at existing noise-sensitive receptors, such as residences. However, implementation of Plan policies would reduce this impact to a less than significant level.

Buildout under the Plan would have significant noise impacts if it would expose people to or generate noise levels in excess of applicable standards. As discussed in Section 4.9.1, Sources of Noise, noise levels are generally highest along or adjacent to major roadways. Because roadway traffic is the greatest noise source in the City, noise-sensitive receptors located adjacent to high-volume roadways would be exposed to the greatest noise increases generated by the Plan. Potential sources of roadway noise exposure associated with growth and development under the Plan include increased traffic on the I-10 and I-710 freeways and arterial roadways. As such, existing noise-sensitive receptors would be exposed to increased traffic noise levels. The analysis contained within this section, therefore, relies primarily upon analysis of the location of current and potential future noise-sensitive receptors in relation to existing and projected future roadway noise contours.

As discussed in Section 4.9.1, Existing Noise Contours, existing roadway noise levels were quantified using the HUD DNL Calculator based on ADT data from a citywide traffic study (Appendix E) and used to generated roadway noise contours for studied roadway segments. Figure 33 shows a map of existing traffic noise contours along major roadways in the City. The location of future roadway noise contours was determined by extrapolating the findings of the traffic study regarding traffic volumes for the future-year 2040 scenario, which would include buildout under the Plan. Roadway noise level estimates do not account for intervening barriers or topography that may shield individual receptors from the noise source. Therefore, the noise contours depicted in this section represent a reasonable, conservative worst-case estimate of noise levels and do not represent a specific estimate of sound levels at any particular location in the City. Figure 35 shows a map of future traffic noise contours, which shows marginal roadway increases when compared to existing traffic noise contours shown in Figure 33. As shown in Figure 35, noise levels along all modeled roadways are expected to exceed 60 dBA CNEL with peak noise levels reaching up to 75 dBA CNEL along various segments of Fremont Avenue, Mission Road, Main Street, Atlantic Boulevard, Garfield Avenue, and Valley Boulevard. Along the I-10 freeway, roadway noise levels are anticipated to reach 80 dBA CNEL, and along the I-710 freeway, roadway noise levels are anticipated to reach 75 dBA CNEL.
Figure 35 Future Roadway Noise Contours – 2040
Table 22 provides a quantitative analysis of traffic noise increases for comparison to the thresholds for changes in roadway noise (see Table 19). Table 22 includes the five roadway and highway segments that, according to the Traffic Impact Analysis (Appendix F), would experience the highest traffic volume increases. In order to provide a valid point of comparison for existing and future noise conditions, CNELs were calculated at a distance of 150 feet from the roadway centerline for the I-10 freeway and 50 feet from the roadway centerline for all other roadways in order to represent noise levels at the roadway edge. Noise farther away from the modeled distances would be lower than noise levels shown in Table 22.

### Table 22 Comparison of Calculated Existing (2017) and Future (2040) Noise Levels along Major Roadways

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>ADT</th>
<th>Existing Noise Level (dBA, CNEL)</th>
<th>Future (2040) with General Plan Buildout</th>
<th>Noise Level Increase (dBA)</th>
<th>FTA Threshold (dBA)</th>
<th>Threshold Exceeded?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fremont Avenue from highway I-10 to Garvey Avenue</td>
<td>12,935</td>
<td>70.0</td>
<td>14,591</td>
<td>70.5</td>
<td>0.5</td>
<td>No</td>
</tr>
<tr>
<td>Garfield Avenue from Alhambra Road to Woodward Avenue</td>
<td>23,721</td>
<td>72.2</td>
<td>26,605</td>
<td>72.7</td>
<td>0.5</td>
<td>No</td>
</tr>
<tr>
<td>Garfield Avenue from Woodward Avenue to Mission Road</td>
<td>27,546</td>
<td>71.9</td>
<td>31,625</td>
<td>72.5</td>
<td>0.6</td>
<td>No</td>
</tr>
<tr>
<td>Garfield Avenue from Mission Road to Valley Boulevard</td>
<td>24,450</td>
<td>72.3</td>
<td>31,140</td>
<td>73.4</td>
<td>1.1</td>
<td>Yes</td>
</tr>
<tr>
<td>Main Street from Atlantic Boulevard to Chapel Street</td>
<td>23,926</td>
<td>71.8</td>
<td>27,459</td>
<td>72.4</td>
<td>0.6</td>
<td>No</td>
</tr>
<tr>
<td>Highway I-10 from Fremont Avenue to Atlantic Boulevard</td>
<td>238,500</td>
<td>78.3</td>
<td>291,303</td>
<td>79.2</td>
<td>0.9</td>
<td>Yes</td>
</tr>
</tbody>
</table>

See Appendix E for noise data and noise modeling worksheets.
Source: Traffic volumes from the Traffic Impact Analysis (TIA) prepared by KOA Corporation in September 2017 (Appendix F)

Garfield Avenue from Mission Road to Valley Boulevard, and the I-10 freeway from Fremont Avenue to Atlantic Boulevard, could experience a noise level increase exceeding the thresholds described in Table 19 under Section 4.9.2 (1.0 dBA increase when the pre-project noise level exceeds 65 dBA CNEL and 0 dBA increase when the pre-project noise level exceeds 75 dBA CNEL). As modeled, the traffic noise impacts at these roadway segments would be potentially significant. However, actual noise levels (both existing and future) may be lower in some locations. For example, Figure 32 shows that the measured noise level at Site 19, on Ramona Avenue in southeast Alhambra, almost directly adjacent to the I-10 freeway but on the other side of the soundwall that runs along much of the freeway throughout the City, was 67.6 dBA, substantially lower than the approximately 75-80 that would be expected without the presence of barriers or intervening topography, according to the noise contour modeling. Additionally, the Plan includes the following policies specifically directed at addressing potential future traffic noise issues:
Policy HS-6B Comply with and enforce applicable City Municipal Code related to noise.

Policy HS-6D Ensure that the potential impacts of transportation noise sources (including non-roadway sources such as helicopter operations and train movement) are analyzed and, when necessary, mitigated through the environmental review process.

Policy HS-6E Establish and maintain coordination among City departments and other relevant agencies involved in noise abatement.

Implementation of the above policies, particularly Policy HS-6D, would ensure that noise impacts are considered as individual development projects and transportation improvements are proposed; and, if necessary, appropriate, site-specific noise attenuation techniques are incorporated into project designs. As necessary, the City may consider a range of traffic noise attenuation techniques, potentially including the use of sound reducing paving materials (such as rubberized asphalt) and, in certain instances, the use of sound barriers. In addition, as noted in the Plan, Policy R-5A in the Resources Chapter, and multiple policies in the Mobility Chapter, the City will continue to emphasize vehicle trip reduction techniques to address traffic issues, with the added benefit that the use of such techniques would also reduce vehicular noise. With implementation of Plan policies, increases in roadway noise at existing noise-sensitive receptors would be reduced to a less than significant level.

Mitigation Measures

Plan goals and policies within the Health and Safety Chapter address the prevention and reduction of unwanted noise. Mitigation beyond these goals and policies is not required.

<table>
<thead>
<tr>
<th>Threshold 3:</th>
<th>A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project</th>
</tr>
</thead>
</table>

Impact N-3: TRAFFIC GENERATED BY NEW DEVELOPMENT FACILITATED BY THE PLAN WOULD RESULT IN AN INCREASE IN AMBIENT NOISE LEVELS FOR NEW NOISE-SENSITIVE RECEPTORS, SUCH AS RESIDENCES. HOWEVER, IMPLEMENTATION OF NOISE ATTENUATION FEATURES IN NEW DEVELOPMENT, AS REQUIRED BY PLAN POLICIES, WOULD REDUCE IMPACTS TO A LESS THAN SIGNIFICANT LEVEL.

As discussed under Impact N-2, Alhambra will experience increased citywide roadway noise due to increased traffic volumes resulting from the overall development growth anticipated under the Plan. As such, new noise-sensitive receptors constructed in future years would be exposed to increased traffic noise levels.

Figure 33 shows existing roadway noise contours in Alhambra, and, for comparison, Figure 35 shows future roadway noise contours calculated using the HUD DNL Calculator, as explained in Existing Noise Contours under Section 4.9.1 of this EIR. Roadway noise contours may not always reflect true noise conditions at a specific location. Intervening structures or other noise-attenuating obstacles between a roadway and a receptor may reduce roadway noise levels at that receptor. However, future noise-sensitive receptors could experience noise levels similar to those indicated by the noise contours. The Union Pacific Railroad line are currently being lowered to below grade as part of the San Gabriel Trench project, which is being carried out by the Alameda Corridor-East Construction Authority. The lowering of the railroad line substantially reduces noise impacts on adjacent land uses due to both the shielding of railroad noise and elimination of at-grade street crossings. However, future noise-sensitive receptors could experience noise associated with the railroad.
The Plan establishes desirable noise exposures for a range of land uses present in the City. Figure 34 shows the City’s compatibility standards used to determine whether proposed new development requires mitigation to avoid potential land use conflicts. Noise levels at new noise-sensitive receptors in the Plan Area would be compared to the City’s compatibility standards to determine if additional noise reduction features are necessary. In general, it is easier to ensure proper noise attenuation for new uses, which can be required to incorporate noise-attenuating features into their design before they are built, than it is to ensure proper noise attenuation for existing uses. Noise impacts are mitigated on a project-level basis through the use of appropriate location-specific design and engineering techniques, including building setbacks, appropriate building siting, sound barriers, and sound attenuating construction techniques. Therefore, the use of such techniques in new development in Alhambra would maintain an acceptable noise environment.

The following Plan policies would ensure that the Plan would have a less than significant impact on noise-sensitive receptors from traffic noise and operational noise from commercial and industrial activities:

**Policy HS-6A** Avoid or reduce excessive noise impacts on noise-sensitive receptors through land use planning, review of new development proposals, and physical interventions such as noise insulation in building design, setbacks, or noise barriers when necessary.

**Policy HS-6B** Comply with and enforce applicable City Municipal Code related to noise.

**Policy HS-6C** Use the land use/noise compatibility matrix on page 94 to determine the compatibility of proposed new development in the City with ambient noise levels.

**Policy HS-6D** Ensure that the potential impacts of transportation noise sources (including non-roadway sources such as helicopter operations and train movement) are analyzed and, when necessary, mitigated through the environmental review process.

**Policy HS-6E** Establish and maintain coordination among City departments and other relevant agencies involved in noise abatement.

Implementation of these policies would ensure that projects proposed in noise environments that potentially exceed acceptable standards would be evaluated, and that appropriate sound attenuation techniques (e.g., site design, sound barriers, construction materials) would be implemented on a case-by-case basis. Because future noise-sensitive receptors would be required to comply with applicable Plan policies to achieve noise exposure levels within compatibility standards, Plan impacts related to increased ambient noise resulting from future growth and development facilitated by the Plan would be less than significant.

### Mitigation Measures

Plan goals and policies address the prevention and reduction of unwanted noise. Mitigation measures beyond implementation of these goals and policies are not required.
4.10 Population and Housing

This section analyzes the Plan’s potential environmental impacts related to population and housing.

4.10.1 Setting

a. Population, Housing, and Employment

Since its incorporation in 1903, Alhambra has changed from a ranch owned by Benjamin Wilson to a nearly fully developed City of approximately 7.6 square miles, with a January 1, 2017 population of 86,922 (California Department of Finance [DOF] DOF 2017).

Table 23 provides tallies of the City’s population by race, country of origin, and Hispanic origin, based on self-identification by survey respondents, taken from Table DP-05 of the 2011-2015 five-year American Community Survey (ACS). The City’s population is diverse, with 52.4 percent of the population of Asian identity (of which about 75 percent identify as Chinese), and 35.9 percent of Hispanic or Latino identity (of which about 80 percent identify as Mexican).

Table 23 Race, Country of Origin, and Hispanic Origin: 2015

<table>
<thead>
<tr>
<th>Race Alone or in Combination with One or More Other Races</th>
<th>Population</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total population</td>
<td>84,782</td>
<td>100.0</td>
</tr>
<tr>
<td>White</td>
<td>22,677</td>
<td>26.7</td>
</tr>
<tr>
<td>Black or African American</td>
<td>1,618</td>
<td>1.9</td>
</tr>
<tr>
<td>American Indian and Alaska Native</td>
<td>561</td>
<td>0.7</td>
</tr>
<tr>
<td>Asian</td>
<td>44,411</td>
<td>52.4</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander</td>
<td>348</td>
<td>0.4</td>
</tr>
<tr>
<td>Some other race</td>
<td>17,884</td>
<td>21.1</td>
</tr>
<tr>
<td>Asian</td>
<td>43,093</td>
<td>50.6</td>
</tr>
<tr>
<td>Chinese</td>
<td>30,683</td>
<td>36.2</td>
</tr>
<tr>
<td>Filipino</td>
<td>2,117</td>
<td>2.5</td>
</tr>
<tr>
<td>Japanese</td>
<td>1,249</td>
<td>1.5</td>
</tr>
<tr>
<td>Korean</td>
<td>986</td>
<td>1.2</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>3,545</td>
<td>4.2</td>
</tr>
<tr>
<td>Other Asian</td>
<td>4,105</td>
<td>4.8</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander</td>
<td>177</td>
<td>0.2</td>
</tr>
<tr>
<td>Hispanic or Latino (of any race)</td>
<td>30,408</td>
<td>35.9</td>
</tr>
<tr>
<td>Mexican</td>
<td>24,222</td>
<td>28.6</td>
</tr>
<tr>
<td>Puerto Rican</td>
<td>244</td>
<td>0.3</td>
</tr>
<tr>
<td>Cuban</td>
<td>532</td>
<td>0.6</td>
</tr>
<tr>
<td>Other Hispanic or Latino</td>
<td>5,410</td>
<td>6.4</td>
</tr>
</tbody>
</table>

Source: Bureau of the Census, 2011-2015 American Community Survey, Table DP-05
Table 24 provides age by sex tallies, taken from ACS Table DP-05. The age profile reflects a population with 44 percent of residents between ages 25 to 54.

Table 24  Sex and Age: 2015

<table>
<thead>
<tr>
<th>Age Cohort</th>
<th>Population</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>41,440</td>
<td>48.9</td>
</tr>
<tr>
<td>Female</td>
<td>43,342</td>
<td>51.1</td>
</tr>
<tr>
<td>Under 5 years</td>
<td>4,288</td>
<td>5.1</td>
</tr>
<tr>
<td>5 to 9 years</td>
<td>4,228</td>
<td>5.0</td>
</tr>
<tr>
<td>10 to 14 years</td>
<td>4,047</td>
<td>4.8</td>
</tr>
<tr>
<td>15 to 19 years</td>
<td>4,599</td>
<td>5.4</td>
</tr>
<tr>
<td>20 to 24 years</td>
<td>6,032</td>
<td>7.1</td>
</tr>
<tr>
<td>25 to 34 years</td>
<td>13,440</td>
<td>15.9</td>
</tr>
<tr>
<td>35 to 44 years</td>
<td>11,410</td>
<td>13.5</td>
</tr>
<tr>
<td>45 to 54 years</td>
<td>12,696</td>
<td>15.0</td>
</tr>
<tr>
<td>55 to 59 years</td>
<td>6,739</td>
<td>7.9</td>
</tr>
<tr>
<td>60 to 64 years</td>
<td>5,045</td>
<td>6.0</td>
</tr>
<tr>
<td>65 to 74 years</td>
<td>6,600</td>
<td>7.8</td>
</tr>
<tr>
<td>75 to 84 years</td>
<td>3,575</td>
<td>4.2</td>
</tr>
<tr>
<td>85 years and over</td>
<td>2,083</td>
<td>2.5</td>
</tr>
</tbody>
</table>

| Median age (years) | 40.7 | (X) |
| 18 years and over  | 69,321 | (X) |
| 65 years and over  | 12,258 | (X) |

Source: Bureau of the Census, 2011-2015 American Community Survey, Table DP-05

As of January 1, 2017, there were 31,653 housing units in the City. 17,612 (55.6 percent) were detached or attached single-family units, 14,011 (44.2 percent) were multi-family units, and 30 (less than 0.1 percent) were mobile homes. The vacancy rate was 5.1 percent, mostly in the multi-family housing stock. Less than one percent of City residents live in group quarters instead of households. Households have an average size of 2.87 persons (DOF 2017).

Table 25 provides age of structure built by decade, taken from Table ACS DP-04. As shown in Table 25, about one-quarter of the City’s housing units were built before 1939, with most of the remaining housing added between 1940 and 1989. New housing development began to decline in 1990 and has only recently increased with the addition of about 600 units since 2014, most of which were multi-family units (DOF 2017). Table 25 does not fully reflect new construction since 2015.
Table 25 Year Structure Built: 2015

<table>
<thead>
<tr>
<th>Period</th>
<th>Units</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total housing units</td>
<td>31,024(^1)</td>
<td>(X)</td>
</tr>
<tr>
<td>Built 2014 or later</td>
<td>13</td>
<td>0.0</td>
</tr>
<tr>
<td>Built 2010 to 2013</td>
<td>217</td>
<td>0.7</td>
</tr>
<tr>
<td>Built 2000 to 2009</td>
<td>1,072</td>
<td>3.5</td>
</tr>
<tr>
<td>Built 1990 to 1999</td>
<td>1,551</td>
<td>5.0</td>
</tr>
<tr>
<td>Built 1980 to 1989</td>
<td>4,285</td>
<td>13.8</td>
</tr>
<tr>
<td>Built 1970 to 1979</td>
<td>3,793</td>
<td>12.2</td>
</tr>
<tr>
<td>Built 1960 to 1969</td>
<td>3,992</td>
<td>12.9</td>
</tr>
<tr>
<td>Built 1950 to 1959</td>
<td>4,239</td>
<td>13.7</td>
</tr>
<tr>
<td>Built 1940 to 1949</td>
<td>4,321</td>
<td>13.9</td>
</tr>
<tr>
<td>Built 1939 or earlier</td>
<td>7,541</td>
<td>24.3</td>
</tr>
</tbody>
</table>

\(^1\) The total number of housing units estimated in 2015, based on DOF Report E-5 (2017), is 31,245 housing units (221 more).

Source: Bureau of the Census, 2011-2015 American Community Survey, Table DP-05

Based on the 2011-2015 ACS data, the labor force participation rate in Alhambra was 62.3 percent and the unemployment rate was 6.7 percent. California Employment Development Department (EDD) preliminary May 2017 employment data show the unemployment rate at 2.5 percent, reflecting recent years of steady economic growth. Figure 36 below shows that about 90 percent of City residents are employed outside the City while the City hosts about 23,600 in-commuters working in the City. Only about 3,600 City residents both live and work within the City.

Figure 36 Inflow/Outflow Jobs Counts in 2014

Source: <https://onthemap.ces.census.gov/>
Figure 37 shows that in 2014 there were 23,725 primary (i.e., full time) jobs in the City, generally located along and between several of the City’s arterials, according to the 2011-2015 ACS data.

Figure 37 Distribution and Number of Primary Jobs in 2014

Source: <https://onthemap.ces.census.gov/>

The Southern California Association of Governments’ (SCAG) 2016 RTP employment estimate of 28,000 jobs in the City in the year 2012 is higher than the 2014 estimate derived from the 2011-2015 ACS data because it includes part-time and informal sector estimates. Using the higher SCAG jobs estimate to capture all jobs and to reflect the 2017 lower unemployment rate, the jobs-to-housing ratio is roughly 28,000/31,653, or 0.88, which reflects a jobs-housing balanced community, neither jobs-rich nor housing-rich.

The 2011-2015 median household income in Alhambra was $53,582, and between 14 and 18 percent of the population was classified as below the poverty rate (ACS 2015, DP-03). The range reflects the ACS margin of error.

Alhambra, in summary, is a nearly-fully-developed, somewhat-older, close-in suburban city to Los Angeles, with a diverse mix of housing, a balanced number of in-city jobs compared to the number of housing units, but with a relatively large in- and out-commuting pattern.

b. Regulatory Setting

The following section summarizes regulations that pertain to population, housing, and employment.

State Housing Element Statutes

State housing element statutes (Government Code Sections 65580-65589.9), also known as Housing Element law, mandate that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that in order for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain,
housing development. As a result, state housing policy rests largely upon the effective implementation of local general plans and in particular, housing elements.

**Regional Housing Needs Assessment (RHNA)**

California’s Housing Element law requires that each county and city develop local housing programs to meet their “fair share” of existing and future housing growth needs for all income groups. SCAG is tasked with distributing the total state-projected housing need for the SCAG Southern California Region among SCAG’s 197 cities and six counties by four income categories (extremely low and very low, low, moderate, and above moderate). This Regional Housing Needs Assessment (RHNA) allocation represents the minimum number of housing units by income level each community is required to plan for through a combination of 1) zoning adequate sites at suitable densities that foster affordability and 2) housing programs to support retention, rehabilitation, and production of lower-income units with a reasonable degree of entitlement certainty.

The current SCAG RHNA planning period is 2013 to 2021, a period set by state legislation. Alhambra’s 2013-2021 RHNA is shown in Table 26.

**Table 26  Regional Housing Needs Assessment 2013-2021**

<table>
<thead>
<tr>
<th>Income Group</th>
<th>RHNA Allocation (units)</th>
<th>Percent of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very Low</td>
<td>380</td>
<td>25.4</td>
</tr>
<tr>
<td>Low</td>
<td>224</td>
<td>15.0</td>
</tr>
<tr>
<td>Moderate</td>
<td>246</td>
<td>16.5</td>
</tr>
<tr>
<td>Above Moderate</td>
<td>642</td>
<td>43.0</td>
</tr>
<tr>
<td>Total</td>
<td>1,492</td>
<td>100.0</td>
</tr>
</tbody>
</table>

Source: [http://www.scag.ca.gov/Documents/5thCyclePFinalRHNAplan.pdf](http://www.scag.ca.gov/Documents/5thCyclePFinalRHNAplan.pdf)

**4.10.2 Impact Analysis**

**a. Methodology and Significance Thresholds**

Impacts relating to population and housing are considered significant if implementation of the Plan would do the following:

1. Induce substantial population growth in an area, either directly or indirectly
2. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere
3. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere

For purposes of analysis, “substantial” population growth is defined as growth exceeding the current SCAG population forecasts for the City. “Substantial” displacement would occur if allowed land uses would displace more residences than would be accommodated through growth facilitated by the Plan.
Changes in the existing population due to the normal operation of the housing market are speculative and not within the scope of this analysis. Both Plan-enabled and market-driven housing development and Plan implementation may change some population characteristics of a community. However, unless population characteristic changes lead to physical changes in the environment, population characteristic changes themselves are not within the scope of this environmental review.

b. Project and Cumulative Impacts

<table>
<thead>
<tr>
<th>Threshold 1:</th>
<th>Induce substantial population growth in an area, either directly or indirectly?</th>
</tr>
</thead>
</table>

**Impact PH-1:** IMPLEMENTATION OF THE PLAN WOULD REDISTRIBUTE RATHER THAN INDUCE GROWTH COMPARED TO SCAG POPULATION AND EMPLOYMENT FORECASTS. THERE WOULD BE NO DIRECT OR INDIRECT GROWTH INDUCELMENT IMPACT.

The Plan would not facilitate additional growth beyond that forecast in SCAG’s 2016 RTP/SCS or beyond that which could occur under the City’s current General Plan. Rather, the Plan would redistribute some of the already forecast growth in the City through creation of the Focus Areas of New Development described in Section 2.3.5, and shown on the proposed General Plan Land Use Map (Figure 5). The goals, policies, and implementing actions contained in the Plan would not directly or indirectly induce substantial population growth by, for example, expanding public utilities beyond what is required to implement the Plan. Therefore, the Plan would not induce substantial population growth in an area, either directly or indirectly, and there would be no impact in this regard.

**Mitigation Measures**

There would be no impact. Therefore, mitigation is not required.

<table>
<thead>
<tr>
<th>Threshold 2:</th>
<th>Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Threshold 3:</td>
<td>Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?</td>
</tr>
</tbody>
</table>

**Impact PH-2:** DEVELOPMENT FACILITATED BY THE PLAN WOULD ADD ABOUT 1,842 NET HOUSING UNITS TO THE CITY’S HOUSING STOCK AND A PROJECTED POPULATION INCREASE OF 1,878 BY 2040. THE NUMBER OF EXISTING HOUSING UNITS THAT COULD BE DISPLACED WOULD BE LESS THAN THE PROJECTED NUMBER OF NEW HOUSING UNITS DEVELOPED, AND THEREFORE NO SIGNIFICANT HOUSING OR POPULATION DISPLACEMENT WOULD OCCUR, MAKING THIS IMPACT LESS THAN SIGNIFICANT.

The DOF estimates that there are 31,653 housing units in Alhambra in 2017, and SCAG’s 2016 RTP/SCS projects that the number of households in 2040 will be 31,900, which reflects only occupied housing units and does not include vacant units. Considering a five percent vacancy rate increases the projected number of total housing units in 2040 to 33,495, a net increase of 1,842 units over the DOF 2017 total housing estimate of 31,653 over a period of about 22 years, or an average of about 84 new units per year.

Development facilitated by the Plan would add an estimated 1,878 residents to the 2017 population of 86,922, bringing the citywide 2040 population to 88,800. The projected number of 1,842 net new housing units and a population increase of 1,878 is a ratio of about 1:1, meaning that if this
population increase were accommodated in these housing units, the result would be about one person per household. This ratio suggests that the number of persons per household in existing households is expected to drop as the existing population ages and as the overall population increases in the city. However, if the average household size remains at 2.87 persons per household, the 1,878 residents would require approximately 654 housing units, 1,188 housing units less than the actual projected amount.

Any displacement facilitated by the Plan would be speculative, since the Plan does not include any specific proposals that would displace people or housing. However, with the net increase in housing of 1,842 units, any future displacement would be more than offset by new construction. Housing currently located on Garfield Avenue in the proposed Garfield Medical Office Corridor focus area may be replaced with medical or other office uses, based on the new land use designation that would be applied to this corridor, leading to potential displacement of housing and its residents, but the net increase of 1,842 housing units would be adequate to house those potentially displaced. Also, because these new housing units would tend to be created in focus areas for new development that are not located in existing neighborhoods, or through free market choices made by property owners in ways not dictated by the Plan, the Plan would not directly displace people or housing in order to accommodate population or housing growth. Therefore, the Plan would not lead to displacement of a substantial number of housing units or people, and these impacts would be less than significant.

**Mitigation Measures**

This impact would be less than significant. Therefore, mitigation is not required.
4.11 Public Services

This section assesses potential impacts to public services, including fire and police protection, public schools, libraries, and parks and recreation. Impacts to water and wastewater infrastructure and solid waste collection and disposal are discussed in Section 4.14, Utilities and Service Systems.

4.11.1 Setting

a. Fire Protection and Emergency Medical Services

The Alhambra Fire Department (AFD) responds to all types of emergency situations involving fires, explosions, rescues, medical emergencies, hazardous conditions, natural disasters, and false alarms. The AFD also responds to nonemergency service calls and good intent calls. The AFD’s firefighters and paramedics are therefore trained and prepared to respond to a wide variety of situations. In 2017, The AFD responded to 6,660 calls, only 1,559 of which (23 percent) actually involved fire. Calls for EMS and rescue, good intent, false alarm, and service call incident type categories accounted for 77 percent of all reported runs. 64 percent of all AFD incidents are categorized as EMS and rescue (Tom Phelps, Fire Chief, personal communication, 2018).

Alhambra is not located in a very high fire hazard severity zone (California Department of Forestry and Fire Protection [CAL FIRE] 2017).

b. Police Protection

The Alhambra Police Department (APD) administers public safety in Alhambra, and has implemented several special programs to control criminal activity in the City, including the juvenile crime reduction plan, traffic safety checkpoints, and parole compliance sweeps. These efforts have contributed to an overall downward trend in crime rates for Alhambra from 2000 to 2015.

As of 2017, the APD is comprised of 85 sworn police officers, 80 full-time and part-time civilians, 3 reserve police officers, four volunteer police chaplains, and 30 community volunteers. The APD is organized into two divisions, Field Services and Support Services, each overseen by an assistant chief and reporting directly to the Chief of Police (Blodgett Baylasis Environmental Planning 2016). The APD’s headquarters is located at 211 South First Street.

c. Public Schools

Alhambra is served by the Alhambra Unified School District (AUSD). The AUSD’s educational facilities in Alhambra include nine grade K-8 elementary schools (Martha Baldwin, Emery Park, Fremont, Garfield, Granada, Marguerita, Northrup, Park, Ramona), three traditional grade 9-12 high schools (Alhambra, San Gabriel, Mark Keppel), two nontraditional high schools (Independence and Century), and one adult school. An additional four elementary schools in the AUSD are located in the City of Monterey Park. Total student enrollment in the AUSD is more than 17,000 students (Education Data Partnership 2017).

Since the 2004-2005 academic school year, the AUSD has seen a steady decline in public school enrollment (California Department of Education 2015). As a result, AUSD has reduced the total number of classrooms while maintaining the same class sizes (full classes, but not utilizing every available classroom in every school). For the past five years, Alhambra High School in particular has
experienced a significant decline in student enrollment, with approximately 700 fewer students than in previous years.

In 2008, voters in the AUSD passed the $50 million Bond Measure MM. Measure MM bond money has gone towards renovating all elementary schools. Several elementary schools have gained brand new classroom buildings. All will have internet connectivity and a new playground.

d. Recreational Services

Of Alhambra's 4,899 acres of land, approximately 192 acres, or four percent of the City, is designated in the Plan as open space. Open space in Alhambra includes parks, trails, landscaped street medians, a golf course, and a limited amount of currently vacant land. The City’s five parks (60 acres) and one public golf course (109 acres) account for approximately 169 acres of total open space acreage or 88 percent of open space. City parks offer a variety of recreational opportunities including baseball fields, soccer fields, tennis courts, playground equipment, basketball courts, and running trails. Comparing Alhambra’s 192 acres of open space to its estimated January 2017 population of 86,922 persons, Alhambra has an open space ratio of 2.2 acres per 1,000 people.

Alhambra and the Alhambra Unified School District maintain a reciprocal use agreement for recreational facilities. After school hours, residents can use recreational facilities on school sites, and children can participate in supervised activities. School sites, which include school buildings, total approximately 160 acres (not included in the total acreage of open space above).

e. Community Library

The state-of-the-art Alhambra Civic Center Library was opened in the heart of the City in 2008. This is the City’s only library facility. It is two-stories, 45,000 square feet, and attracts 55,000 visitors each month. Roughly 75 percent of these visitors are Alhambra residents. It has over 120,000 items in its collection, including books, magazines, newspapers, audiobooks, and DVDs. With a circulation of 110 items per hour and about 290,000 items annually, it is one of the busiest libraries in California.

In addition to providing local residents access to tangible materials, the library was also developed to serve as an electronic access point. It has 1.53 public access computers per 1,000 city residents, above the state average of 1 computer per 1,000 state residents. The library’s Children’s Room has 20 multi-function computers for children that offer educational games and word-processing programs, in addition to restricted internet connectivity.

4.11.2 Impact Analysis

a. Methodology and Significance Thresholds

In accordance with Appendix G of the CEQA Guidelines, the proposed project would result in potentially significant impacts related to public services if it would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable services ratios, response times, or other performance objectives for any of the following public services:

1. Fire protection
2. Police protection
3. Schools
4. Parks
5. Other public facilities (such as libraries)

In addition to the project’s potential impacts to parks, Appendix G of the CEQA Guidelines also contains criteria for potential impacts to recreation. The proposed project would result in potentially significant impacts related to recreation if it would increase the use of existing parks or other recreational facilities such that substantial physical deterioration of the facility would occur or if it include construction of recreational facilities which might have an adverse physical effect on the environment.

**Fire Protection Service**

Information on current service demands and available staff and equipment was provided by the AFD. If the construction of new facilities were required to meet increased demand, it could result in potentially significant secondary environmental impacts. Impacts would be considered significant if development under the Plan would create the need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.

**Police Protection Service**

Information on current service demands and available staff and equipment was provided by Assistant Chief Elliot Kase, Support Services Division, APD (August 2017). This information was compared to the projected service demands that could be expected as a result of development facilitated by the Plan.

For the APD, the ideal ratio of police officers to citizens is 1.0 officer per 1,000 residents.

The City of Alhambra does not have specific significance thresholds for police protection services. Therefore, impacts would be potentially significant if development facilitated by the Plan would result in unacceptable police to citizen ratios, thus creating the need for new police protection facilities, the construction of which may create significant secondary environmental effects.

**Public Schools**

Information on current school facilities was collected from administrators at the Alhambra Unified School District (AUSD). Specifically, information pertaining to school enrollment was used in the analysis of Public Schools (see Impact PS-3). Student generation factors, provided by the AUSD, were used to determine potential future enrollment. These projections were also included in the analysis.

Impacts would be significant if public schools in the City could not accommodate, according to AUSD, future student growth through the construction of new facilities, or expansion of existing facilities. However, any development within the City would be required to pay state-mandated school impact fees. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees “...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.”
Recreational Facilities

Impacts are considered significant if Plan implementation would 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, or if Plan implementation would include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

Public Library

The Plan would result in potentially significant impacts if Plan implementation would result in substantial adverse physical impacts associated with provision of new or physically altered governmental facilities, or the 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.

b. Project and Cumulative Impacts

| Threshold 1: | Would the proposed project result in substantial adverse environmental impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives? |

Impact PS-1: Development facilitated by the Plan would increase the City’s population and density of development, and could increase demand for fire protection and emergency medical services, but would not create the need for new fire protection facilities. Compliance with applicable codes and regulations and compliance with Plan goals and policies would reduce potential impacts related to fire protection and emergency medical services to a less than significant level.

The Plan would not expand Alhambra’s City limits or extend development into undeveloped areas, but development could occur in the City that would increase the City’s population. While fire and emergency medical service capacity is primarily based on service area, an increase in population could incrementally increase the number of service calls and could eventually necessitate the need for additional staff and possibly facilities.

Any new development that would occur under the Plan would be required to comply with all applicable federal, state, and local regulations governing the provision of fire protection services, including adequate fire access, fire flows, and number of hydrants. This includes the 2016 California Fire Code, which contains project-specific requirements such as construction standards in new structures and remodels, road widths and configurations designed to accommodate the passage of fire trucks and engines, and requirements for minimum fire flow rates for water mains.

The following Plan goals and policies address fire and emergency medical service:

**Goal SI-8** Fire and emergency medical response that meets the needs of resident, visitors, and businesses.

**Policy SI-8A** Maintain Fire Department staffing and equipment levels adequate to meet community fire and emergency medical response demands.
Policy SI-8B  Ensure that existing and new development minimizes fire risk through application of appropriate fire code requirements.

Implementation of these Plan policies and compliance with existing building and fire codes, would reduce potential fire hazards associated with new development. Additionally, increases in population and intensification of development in the City resulting from development facilitated by the Plan would require additional staff and support equipment, but not new or expanded fire facilities (Tom Phelps, Fire Chief, Personal Communication, 2017). Therefore, population growth that could occur under the Plan would not increase the need for fire and emergency medical services to a level where new or expanded facilities would be needed, and impacts would be less than significant.

Mitigation Measures

Potential growth associated with the Plan would have a less than significant impact related to fire protection services. Therefore, mitigation is not required.

Threshold 2: Would the proposed project result in substantial adverse environmental impacts associated with the provision of new or physically altered police protection facilities, or need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

Impact PS-2: Development facilitated by the Plan would increase demand for police protection service, but would not result in the need to construct new police facilities. Impacts would be less than significant.

Police protection services are not “facility-driven,” meaning such services are not as reliant on facilities in order to effectively patrol a beat. An expansion of, or intensification of development within, a beat does not necessarily result in the need for additional facilities if police officers and patrol vehicles are equipped with adequate telecommunications equipment in order to communicate with police headquarters. However, if the geographical area of a beat is expanded, population increases, or intensification/redevelopment of an existing beat results in the need for new police officers, new or expanded facilities could be needed.

As discussed in the Police Protection Service section above, the Alhambra Police Station does currently and would continue in the future to provide police protection services to the City of Alhambra through at least 2040 (Kase, 2017). The APD’s ideal ratio of police officers to residents is 1.0 officers per 1,000 residents. The potential for growth in the City between 2017 and 2040 is approximately 1,878 residents, which would warrant an increase of approximately 2.0 police officers. The current police facility would be able to accommodate that increase (Kase, 2017).

An increase in population would also cause an increase in calls for service that includes police reports, Records Section counter contacts, phone calls, etc. An increase in population of 1,878 residents would cause an increase in at least one records clerk to support the processing of reports and an increase of one police service officer (Kase, 2017).

Therefore, potential development projected by the Plan may warrant an increase of up to approximately 2.0 sworn police officers, a records clerk, and a non-sworn police service officer, but would not result in the need to construct new police facilities. Impacts to police protection service
would be less than significant. In addition, implementation of the following Plan policies would further ensure that impacts related to police protection services would be less than significant.

**Policy SI-6A**
Ensure that police service is provided in a manner that reflects and is sensitive to the characteristics and needs of Alhambra residents, businesses, and visitors.

**Policy SI-6B**
Implement effective programs to attract and retain officers.

**Policy SI-6C**
Provide neighborhood patrol to maintain rapid response times and to deter crime.

**Policy SI-6D**
Provide staffing for special events in the community to ensure proper and orderly crowd control as needed.

**Mitigation Measures**
Development facilitated by the Plan would have a less than significant impact related to police protection services. Therefore, mitigation is not required.

**Threshold 3:**
Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

**Impact PS-3:**
Development facilitated by the Plan could result in an increase in student enrollment. However, schools in Alhambra have adequate capacity to serve the additional students. Impacts would be less than significant.

Development facilitated by the Plan would likely increase enrollment at AUSD schools, but none of the schools in the AUSD are at capacity, as shown in Table 27.

This table also compares the potential increase in school enrollment by 2040 under the Plan to the existing school capacity for AUSD elementary schools and high schools serving the City.

**Table 27 Projected School Capacity and Enrollment**

<table>
<thead>
<tr>
<th>Grade Level</th>
<th>Current Capacity</th>
<th>Current School Enrollment</th>
<th>New Students from Potential Growth Through 2040*</th>
<th>Projected 2030 Student Enrollment in 2040</th>
<th>Students Below Current Capacity</th>
<th>Capacity Utilization (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elementary School (K-8)</td>
<td>12,672</td>
<td>9,459</td>
<td>345</td>
<td>9,804</td>
<td>2,868</td>
<td>77</td>
</tr>
<tr>
<td>High School (9-12)</td>
<td>8,784</td>
<td>6,930</td>
<td>138</td>
<td>7,068</td>
<td>1,716</td>
<td>80</td>
</tr>
<tr>
<td>Total</td>
<td>21,456</td>
<td>16,389</td>
<td>483</td>
<td>16,872</td>
<td>4,574</td>
<td>79</td>
</tr>
</tbody>
</table>

* Calculated based upon rates of 0.15 elementary school students and 0.06 high school students per multiple family residence. The total increase in students is based upon the number of households shown in Table 6 in Section 2, Project Description.

AUSD is currently operating with 16,389 seats filled and an overall student housing capacity of 21,456 seats. This leaves an excess of 5,067 seats (1,854 high school and 3,217 elementary) in the District (Table 27).
Therefore, the District has adequate educational facilities to house additional enrollment in elementary and high schools generated by development facilitated by the Plan, and construction of additional elementary and high schools within the AUSD would not be necessary.

Pursuant to Section 65995 (3) (h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees “...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.” Therefore, because there is adequate capacity within the existing schools and payment of school impact fees by developers in the City is mandatory, impacts would be less than significant.

**Mitigation Measures**

Potential growth associated with the Plan would have a less than significant impact related to schools. Therefore, mitigation is not required.

**Threshold 4:** 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?

**Impact PS-4:** Development forecast to occur through 2040 would increase the City’s population by 1,878 residents (about two percent), thus incrementally increasing demand for open space and recreational facilities. Since Alhambra is built out, space for recreational facilities is limited. However, recreational needs can be met by developing small vacant lands with pocket parks, increased use of schools and other facilities, and a potential new regional park in the I-710 right-of-way. Based on the limited growth anticipated and available means to enhance recreational opportunities, impacts related to the physical deterioration of recreational facilities would be less than significant.

With 192 acres of designated open space (including 60 acres of parks and 109-acre golf course) and 86,922 residents, the City’s open space to population ratio is 2.2 acres per 1,000 residents, while the parks to population ratio is 0.7 acres per 1,000 residents without the golf course and 1.9 acres per 1,000 residents with the golf course. Anticipated development that could occur by 2040 would increase the City’s 2017 population by 1,878 residents, to a total population of 88,800. This would incrementally decrease the open space to residents ratio in the City. Therefore, if the if no additional recreational facilities were built, the City would not attain 3 acres per 1,000 residents. Given the limited amount of additional open space available in the City, it is unlikely that the City could provide 3 acres of park space per 1,000 residents unless additional land becomes available (such as through a school closure).

The Quimby Act enables cities in California with standards of 3 acres per 1,000 residents to assess new developments an impact fee for park development. Currently, Chapter 5.06 of the Alhambra Municipal Code requires that any person constructing any new dwelling unit, or trailer space, in the City pay a $2,000 per unit “new construction tax” to provide additional revenues to the City that can be used to finance public recreational facilities.

Because Alhambra is mostly built out, space for new parks is limited. However, development of pocket parks and community gardens on small vacant land, not designated for open space, is one way to provide additional passive open space. As stated in the Quality of Life chapter of the Plan,
the City will continue to investigate opportunities to acquire vacant properties that could be developed with these types of small, neighborhood-serving facilities.

The Plan also identifies a potential future park site at the northern terminus of the 710 Freeway. The Plan includes policies QL-6B and LU-8E, which call on the City to investigate the potential for and feasibility of new parks, such as the new regional park in the I-710 right-of-way.

Neither new pocket parks, nor the new regional park would be in locations that would be expected to result in the disturbance of environmental resources or otherwise create significant environmental effects.

The Plan’s Quality of Life and Land Use & Community Design Chapters include the following goals and policies to maintain an adequate amount of recreational facilities in the City.

**Goal QL-6** Provision of adequate and accessible recreation and open space amenities.

**Policy QL-6A** Where feasible and desirable, add new recreation facilities such as dog parks and skate parks.

**Policy QL-6B** Investigate the feasibility of a new regional park in the I-710 right-of-way.

**Policy QL-6C** Connect existing open spaces to the population with the greatest need for these open spaces.

**Policy QL-6D** Extend the hours of existing recreational facilities by lighting them at night where feasible and desirable.

**Policy QL-6E** Coordinate with school districts on the joint use of schools as recreational areas. In the event of continued declining public school enrollment and/or school closures, consider the possible conversion of school sites to recreational use.

**Policy QL-6F** Encourage the development of quality commercial recreational facilities on privately held and City-owned land under long-term lease or concession agreements. Such agreements allow the City to provide a wider range of facilities than it could on its own, without heavy financial risk. Examples of such facilities might include roller skating rinks and racquetball courts.

**Policy QL-6G** Where feasible and desirable, utilize vacant properties to provide new open space and passive recreation opportunities in the form of pocket parks and/or community gardens.

**Policy QL-6H** Continue to charge park impact fees on new development.

**Policy QL-6I** Consider environmental justice issues as they relate to the equitable provision of desirable public amenities such as parks, recreational facilities, community gardens, and other beneficial uses that improve the quality of life.

**Goal LU-8** Maintenance and development of quality public spaces.

**Policy LU-8C** Enhance the open space network around corridors and activity nodes by providing paseos, courtyards, plazas, larger parkways, and landscaped setbacks.

**Policy LU-8E** Investigate the potential for new parks, including in the I-710 right-of-way. For more details see the Quality of Life chapter.

Given the City’s plans for additional parks; the availability of development construction fees for park development; and Plan goals and policies designed to provide and maintain adequate, accessible,
and quality recreational and open space amenities; it is anticipated that an increase in recreational facilities would occur under the Plan that would accommodate increased demand from population growth. In addition, the City will continue to investigate opportunities to use school sites for recreational programs. Although the City likely will not be able to provide park acreage meeting the three acres per 1,000 residents standard, the two percent growth in population anticipated to occur over the life of the Plan would not substantially alter overall park demand in the City. In addition, the Plan identifies opportunities to augment the local park inventory through the development of new pocket parks and possible development of a new regional park in the 710 Freeway right-of-way and increased use of school sites for recreational needs. Impacts related to the physical deterioration of recreational facilities would be less than significant.

**Mitigation Measures**

The incremental residential growth that would be accommodated by the Plan would not cause a substantial change in demand for park space and the Plan includes some opportunities to augment existing parks through development of pocket parks, a potential regional park, and use of school facilities. Therefore, mitigation is not required.

<table>
<thead>
<tr>
<th>Threshold 4:</th>
<th>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?</th>
</tr>
</thead>
</table>

**Impact PS-5**: **Anticipated growth through 2040 would increase the City’s population by about two percent, with a proportionate increase in demand on parks and recreation facilities. Development of park sites identified in the Plan would incrementally increase the amount of parks, and implementation of the Plan’s bikeways map would provide bicycling and pedestrian infrastructure. Provision of these new parks and improved bicycling and pedestrian infrastructure would not result in significant, adverse physical effects on the environment. Environmental impacts related to the development of new parks would be less than significant.**

As discussed under Impact PS-5, the Plan encourages the development of pocket parks and community gardens on small vacant land, and Policy LU-8E is to investigate the potential for new parks, including in the I-710 right-of-way.

Figure 12 Conceptual Bikeways Map of the Plan illustrates the City’s existing and proposed future bicycle network. The proposed system includes a total of approximately 37.7 miles of new bikeway facilities as shown in Table 28. In addition, Figure 12 of the Plan shows 37 short-term and 12 long-term recommended parking locations (Figure 41).

The City actively seeks additional sources of funding to aid in the implementation of programs that would improve facilities for all modes of travel, including pedestrians, transit riders, and bicyclists.

**Table 28  Current and Future Bicycle Network Length (in miles)**

<table>
<thead>
<tr>
<th>Bikeway Classification</th>
<th>Existing</th>
<th>Proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Class II Bike Lanes</td>
<td>0</td>
<td>2.2</td>
</tr>
<tr>
<td>Class III Bike Lanes</td>
<td>0</td>
<td>35.5</td>
</tr>
<tr>
<td>Total</td>
<td>0</td>
<td>37.7</td>
</tr>
</tbody>
</table>

Source: Alhambra General Plan Figure 12 Conceptual Bikeways Map (Figure 41)
Improvement and expansion of the existing bicycle and pedestrian network would provide additional recreational facilities for use by city residents in addition to planned park improvements. The potential for addition of new parkland, bicycle facilities and pedestrian facilities to result in adverse physical effects on the environment would be low, but would depend on the precise type and location of such facilities and would therefore need to be addressed in a project-level environmental review. Also, all bike lanes would be created within existing rights-of-way, and therefore would have little to no direct physical impact on the environment. Consequently, it is anticipated that the City’s review processes would adequately mitigate any potential secondary environmental impacts relating to the development of new parkland, bicycle facilities and pedestrian facilities.

Based on the above, new parks, bicycle facilities and pedestrian facilities that could be developed in the City would have a less than significant impact on the environment and no mitigation would be required.

**Mitigation Measures**

Potential new parks associated with the Plan would be limited to new pocket parks on vacant infill properties, a potential regional park in the 710 Freeway right-of-way, and school sites. These locations do not include environmentally sensitive resources; therefore, any development of new parks would have a less than significant impact on the environment. Therefore, mitigation is not required.

| Threshold 5: | Would the proposed project result in substantial adverse environmental impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts? |

**Impact PS-6:** The Alhambra Civic Center Library will meet the City’s library needs through 2040. Therefore, impacts related to the City’s library system would be less than significant.

The state-of-the-art Alhambra Civic Center Library was opened in 2008 and attracts 55,000 visitors each month. Forecast population growth in the City between 2017 and 2040 is approximately 1,878 residents, which is about four percent of the library’s current visitorship. Given that not all new residents would visit the library every month, the increase in monthly visitation would be lower than four percent, and the new library facility would be able to accommodate the needs of the additional City residents through 2040. Therefore, impacts to library services would be less than significant.

As indicated by the Plan goals, objectives, and policies listed below, the City plans to continue to provide library services that meet the needs and desires of the community. The goals and policies listed below would help ensure that the Alhambra Civic Center Library continues to adequately serve the City.

<table>
<thead>
<tr>
<th>Goal SI-4</th>
<th>An Alhambra Public Library that provides high-quality service in a high-quality setting to Alhambra residents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy SI-4A</td>
<td>While continuing to provide traditional library services, adapt to current demands and anticipate the need to adapt to future innovations in technology.</td>
</tr>
<tr>
<td>Policy SI-4B</td>
<td>Provide adequate space in the Alhambra Public Library for current and planned collections, users, staff, and services.</td>
</tr>
</tbody>
</table>
Policy SI-4C  Maintain telecommunication systems at the Alhambra Public Library that allow for high-quality internet access.

Policy SI-4D  Continue to meet building code requirements at the Alhambra Public Library and consider the latest trends in technology, ergonomics, lighting, etc., for a high-quality, functional, and comfortable library facility.

Goal SI-5  An Alhambra Public Library that is accessible to all users

Policy SI-5A  Ensure that the Alhambra Public Library is reasonably accessible, physically and electronically, to all users.

Policy SI-5B  Ensure that the hours and days of operation of the Alhambra Public Library continue to meet the needs of the City’s residents.

Mitigation Measures
Potential growth associated with the Plan would have a less than significant impact related to library services. Therefore, mitigation is not required.
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4.12 Transportation/Traffic

This section evaluates the Plan’s potential impacts to local transportation and circulation system. The analysis is based on the information included in the Traffic Impact Analysis (TIA) prepared by KOA Corporation in September 2017. The TIA is included in Appendix F. The study area of the TIA is the City of Alhambra, and thus corresponds to the Plan Area. The term “Plan Area” is therefore used in this section, rather than the term “study area,” for the sake of using consistent terminology throughout the EIR.

4.12.1 Setting

a. Existing Street Network

The scope of the TIA was developed by KOA Corporation in coordination with Rincon Consultants, Inc. and the City of Alhambra. As shown in Figure 38, a total of 45 intersections and 34 roadway segments in the Plan Area were analyzed.

Intersections

The following 45 intersections are analyzed in the TIA:

- Granada Avenue & Huntington Drive
- Atlantic Boulevard & Huntington Drive
- Garfield Avenue & Huntington Drive
- Atlantic Boulevard & Garfield Avenue
- Atlantic Boulevard & Pine Street
- Garfield Avenue & Pine Street
- Fremont Avenue & Alhambra Road
- Atlantic Boulevard & Alhambra Road
- Garfield Avenue & Alhambra Road
- Fremont Avenue & Main Street
- Fremont Avenue & Poplar Boulevard
- Palm Avenue/Poplar Boulevard & Main Street
- Raymond Avenue/Palm Avenue & Main Street
- Marengo Avenue & Main Street
- Atlantic Boulevard & Main Street
- 5th Street & Main Street
- 4th Street & Main Street
- 3rd Street & Main Street
- 1st Street & Main Street
- Garfield Avenue & Main Street
- Chapel Avenue & Main Street
- Almansor Street & Main Street
Figure 38 Location of Study Intersections and Roadway Segments
- Fremont Avenue & Commonwealth Avenue
- Palm Avenue & Commonwealth Avenue
- Garfield Avenue & Commonwealth Avenue
- Fremont Avenue & Concord Avenue
- Fremont Avenue & Orange Street
- Fremont Avenue & Mission Road
- Marengo Avenue & Mission Road
- Marengo Avenue & Front Street
- Atlantic Boulevard & Mission Road
- Atlantic Boulevard & Front Street
- Garfield Avenue & Mission Road
- Fremont Avenue & Valley Boulevard
- Marengo Avenue & Valley Boulevard
- Atlantic Boulevard & Valley Boulevard
- Garfield Avenue & Valley Boulevard
- New Avenue & Valley Boulevard
- Garfield Avenue & Norwood Place
- Atlantic Boulevard & Glendon Way
- Garfield Avenue & Glendon Way
- Fremont Avenue & Hellman Avenue
- Fremont Avenue & Montezuma Avenue
- Atlantic Boulevard & Hellman Avenue
- Garfield Avenue & Hellman Avenue

**Roadway Segments**

The following 34 roadway segments are analyzed in the TIA.

- Huntington Drive, between Granada Avenue and Atlantic Boulevard
- Garfield Avenue, between Huntington Drive and Alhambra Road
- Atlantic Boulevard, between Huntington Drive and Alhambra Road
- Alhambra Road, between Fremont Avenue and Marengo Avenue
- Alhambra Road, between Atlantic Boulevard and Garfield Avenue
- Fremont Avenue, between Alhambra Road and Main Street
- Atlantic Boulevard, between Alhambra Road and Main Street
- Chapel Street, between Alhambra Road and Main Street
- Granada Ave, between Alhambra Road and Main Street
- Marengo Avenue, between Alhambra Road and Main Street
- Fremont Avenue, between Main Street and Commonwealth Avenue
- Main Street, between Fremont Avenue and Marengo Avenue
- Main Street, between Marengo Avenue and Atlantic Boulevard
b. **Existing Traffic Volumes and Level of Service**

The analysis of operations at the study intersections was conducted for weekday a.m. and p.m. peak-hour conditions. Traffic counts were conducted for this study on May 21, 2015, and the year 2017 was defined for existing conditions. An annual ambient growth rate was determined by a comparison of existing and future traffic volumes from the current regional growth model, which is maintained by the Southern California Association of Governments (SCAG).

**Intersection Operations Analysis**

The analysis of peak-hour intersection Level of Service (LOS) has traditionally been the primary indicator of circulation system performance. SB 743, which was signed into law by Governor Brown in 2013, tasked the State Office of Planning and Research (OPR) with establishing new criteria for determining the significance of transportation impacts under CEQA. SB 743 requires the new criteria to “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” It also states that alternative measures of transportation impacts may include “vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.” While OPR has released a draft update to the State CEQA Guidelines that reflects this mandate, these updated CEQA Guidelines have not yet been formally adopted by the state, and also do not reflect the City of Alhambra’s adopted traffic impact thresholds, which are defined by the County of Los Angeles Department of Public Works Traffic Impact Analysis Report Guidelines (see also Section 4.12.2a, Methodology and
Significance Thresholds) (OPR 2016). Therefore, for the purposes of this analysis, analysis of peak-hour LOS remains the applicable impact criteria.

While analysis of peak-hour LOS was used in this impact analysis, the Plan would generally not increase per-capita vehicle miles travelled (VMT) because it would focus future development in focus areas emphasizing walkability and a mix of uses to connect neighborhoods and reduce vehicle use in these areas, while maintaining the City’s other established neighborhoods (for further discussion of this topic see Impact AQ-1). The Plan also includes policies intended to increase the use of alternative transportation and shorten vehicle trips throughout the City, causing a decrease in VMT. These policies are discussed under Impact GHG-1 in Section 4.5, Greenhouse Gas Emissions of this EIR.

For the analysis of Plan Area intersections in this EIR, the Intersection Capacity Utilization (ICU) methodology procedure was used to calculate LOS. ICU calculations used to determine the intersection volume-to-capacity ratio (V/C) and corresponding LOS were based on the turning movements and intersection characteristics at the signalized intersections. The methodology calculates the V/C ratio based on a default capacity (C) per lane, usually 1,600 vehicles per hour (vph) per lane and 2,280 vph for dual turn lanes. A total intersection loss time (the time during which no vehicles are able to pass through an intersection during a green traffic signal due to slow driver reaction time and time required to accelerate from a full stop) of 10 seconds was applied to the V/C ratio.

The concept of intersection level of service is calculated as the volume of vehicles that pass through the facility divided by the capacity of that facility. A facility is “at capacity” (V/C of 1.000 or greater) when extreme congestion occurs. This volume/capacity ratio value is based upon volumes by lane, lane capacity, and approach lane configurations.

LOS values range from LOS A to LOS F. LOS A indicates excellent operating conditions with little delay to motorists, whereas LOS F represents congested conditions with excessive vehicle delay. LOS E is typically defined as the operating “capacity” of a roadway. Significant traffic impacts are defined using separate thresholds based on operational changes and multiple LOS values.

Table 29 defines LOS value ranges based on V/C ratios for signalized intersections. LOS E conditions denote near-capacity conditions, while LOS F conditions denote at-capacity or over-capacity conditions.
Table 29  Level of Service Range Definitions

<table>
<thead>
<tr>
<th>Level of Service (LOS)</th>
<th>Volume-to-Capacity Definition</th>
<th>Volume to Capacity Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>LOS A describes primarily free-flow operations at average travel speeds, usually about 90 percent of the free-flow speed for the arterial classification. Vehicles are completely unimpeded in their ability to maneuver within the traffic stream. Stopped delay at signalized intersections is minimal.</td>
<td>0.00 – 0.600</td>
</tr>
<tr>
<td>B</td>
<td>LOS B represents reasonably unimpeded operations at average travel speeds, usually about 70 percent of the free-flow speed for the arterial classification. The ability to maneuver within the traffic stream is only slightly restricted and stopped delays are not bothersome. Drivers are not generally subjected to appreciable tension.</td>
<td>0.601 – 0.700</td>
</tr>
<tr>
<td>C</td>
<td>LOS C represents stable operations. However, ability to maneuver and change lanes in mid-block locations may be more restricted than at LOS B, and longer queues, adverse signal coordination, or both may contribute to lower average speeds of about 50 percent of the average free-flow speed for the arterial classification. Motorists will experience appreciable tension while driving.</td>
<td>0.701 – 0.800</td>
</tr>
<tr>
<td>D</td>
<td>LOS D borders on a range in which small increases in flow may cause a substantial increase in delay and hence decreases in arterial speed. LOS D may be due to adverse signal progression, inappropriate signal timing, high volumes, or some combination of these factors. Average travel speeds are about 50 percent of free-flow speed</td>
<td>0.801 – 0.900</td>
</tr>
<tr>
<td>E</td>
<td>LOS E is characterized by significant delays and average travel speeds of one-third the free-flow speed of less. Such operations are caused by some combination of adverse progression, high signal density, high volumes, extensive delays at critical intersections, and inappropriate signal timing.</td>
<td>0.901 – 1.000</td>
</tr>
<tr>
<td>F</td>
<td>LOS F characterizes arterial flow at extremely low speeds below one-third to one-fourth of the free-flow speed. Intersection congestion is likely at critical signalized locations, with high delays and extensive queuing. Adverse progression is frequently a contributor to this condition.</td>
<td>Over 1.000</td>
</tr>
</tbody>
</table>

Source: Transportation Research Board 2000

Intersection LOS

Analysis of existing weekday intersection LOS peak a.m. and p.m. peak-hour conditions are summarized in Table 30.

Table 30  Study Intersection Performance for Existing Peak-Hour Conditions

<table>
<thead>
<tr>
<th>Study Intersections</th>
<th>AM Peak Hour</th>
<th>PM Peak Hour</th>
</tr>
</thead>
</table>
|                           | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LOS | ICU  | LO
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<tr>
<th>Study Intersections</th>
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<th>PM Peak Hour</th>
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<td>B</td>
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<tr>
<td>Palm Ave/Poplar Blvd &amp; Main St</td>
<td>0.569</td>
<td>A</td>
</tr>
<tr>
<td>Raymond Ave/Palm Ave &amp; Main St</td>
<td>0.720</td>
<td>C</td>
</tr>
<tr>
<td>Marengo Ave &amp; Main St</td>
<td>0.636</td>
<td>B</td>
</tr>
<tr>
<td>Atlantic Blvd &amp; Main St</td>
<td>0.797</td>
<td>C</td>
</tr>
<tr>
<td>5th St &amp; Main St</td>
<td>0.438</td>
<td>A</td>
</tr>
<tr>
<td>4th St &amp; Main St</td>
<td>0.442</td>
<td>A</td>
</tr>
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<td>3rd St &amp; Main St</td>
<td>0.405</td>
<td>A</td>
</tr>
<tr>
<td>1st St &amp; Main St</td>
<td>0.498</td>
<td>A</td>
</tr>
<tr>
<td>Garfield Ave &amp; Main St</td>
<td>0.666</td>
<td>B</td>
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<tr>
<td>Chapel St &amp; Main St</td>
<td>0.589</td>
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</tr>
<tr>
<td>Almansor St &amp; Main St</td>
<td>0.542</td>
<td>A</td>
</tr>
<tr>
<td>Fremont Ave &amp; Commonwealth Ave</td>
<td>0.691</td>
<td>B</td>
</tr>
<tr>
<td>Palm Ave &amp; Commonwealth Ave</td>
<td>0.377</td>
<td>A</td>
</tr>
<tr>
<td>Garfield Ave &amp; Commonwealth Ave</td>
<td>0.589</td>
<td>A</td>
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<tr>
<td>Fremont Ave &amp; Concord Ave</td>
<td>0.636</td>
<td>B</td>
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<td>A</td>
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<tr>
<td>Fremont Ave &amp; Mission Rd</td>
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<td>E</td>
</tr>
<tr>
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<td>D</td>
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<tr>
<td>Marengo Ave &amp; Front St</td>
<td>0.686</td>
<td>D</td>
</tr>
<tr>
<td>Atlantic Blvd &amp; Mission Rd</td>
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<td>D</td>
</tr>
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<td>Atlantic Blvd &amp; Front St</td>
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<td>B</td>
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<td>Garfield Ave &amp; Mission Rd</td>
<td>0.868</td>
<td>D</td>
</tr>
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<td>Fremont Ave &amp; Valley Blvd</td>
<td>0.820</td>
<td>D</td>
</tr>
<tr>
<td>Marengo Ave &amp; Valley Blvd</td>
<td>0.758</td>
<td>C</td>
</tr>
<tr>
<td>Atlantic Blvd &amp; Valley Blvd</td>
<td>0.890</td>
<td>D</td>
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<td>Garfield Ave &amp; Valley Blvd</td>
<td>0.816</td>
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<tr>
<td>New Ave &amp; Valley Blvd</td>
<td>0.821</td>
<td>D</td>
</tr>
<tr>
<td>Garfield Ave &amp; Norwood Pl</td>
<td>0.692</td>
<td>B</td>
</tr>
<tr>
<td>Atlantic Blvd &amp; Glendon Way</td>
<td>1.036</td>
<td>F</td>
</tr>
<tr>
<td>Garfield Ave &amp; Glendon Way</td>
<td>0.841</td>
<td>D</td>
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<tr>
<td>Fremont Ave &amp; Hellman Ave</td>
<td>0.710</td>
<td>C</td>
</tr>
<tr>
<td>Fremont Ave &amp; Montezuma Ave</td>
<td>0.624</td>
<td>B</td>
</tr>
<tr>
<td>Atlantic Blvd &amp; Hellman Ave</td>
<td>0.849</td>
<td>D</td>
</tr>
<tr>
<td>Garfield Ave &amp; Hellman Ave</td>
<td>0.793</td>
<td>C</td>
</tr>
</tbody>
</table>

Source: KOA Corporation 2017 (Appendix F)
Thirty-five of the intersections shown in Table 30 operate at good LOS values D or better under existing conditions, while the following nine intersections operate at LOS E or F during the a.m. and p.m. peak hours:

- Atlantic Boulevard & Huntington Drive – operates at LOS E during the p.m. peak hour
- Fremont Avenue & Alhambra Road – operates at LOS F during the a.m. peak hour, and LOS E during the p.m. peak hour
- Raymond Ave/Palm Ave & Main St – operates at LOS F during the p.m. peak hour
- Fremont Avenue & Mission Road – operates at LOS E during the a.m. peak hour
- Marengo Avenue & Mission Road – operates at LOS E during the p.m. peak hour
- Garfield Avenue & Mission Road – operates at LOS E during the p.m. peak hour
- Fremont Avenue & Mission Road – operates at LOS F during the p.m. peak hour
- Atlantic Boulevard & Valley Boulevard – operates at LOS F during the p.m. peak hour
- Atlantic Boulevard & Glendon Way – operates at LOS F during the p.m. peak hour

**Roadway Segment LOS**

Daily traffic counts were collected at the analyzed roadway segments. The LOS values for each segment were calculated to determined daily traffic operations. Existing conditions analysis is based on year 2017 conditions. Table 31 provides the weekday LOS values for the studied roadway segments based on each segment’s defined capacity compared to its daily total volume.

A shown in Table 31, the following study roadway segments are operating at LOS E or F:

- Fremont Avenue between Concord Avenue and Valley Boulevard
- Marengo Avenue between Mission Road and Valley Boulevard
- Atlantic Boulevard between Valley Boulevard and Hellman Avenue
- Garfield Avenue between Valley Boulevard and Hellman Avenue

Figure 39 shows daily traffic volumes under existing conditions.
### Table 31: Study Roadway Segment Operations for Existing Peak-Hour Conditions

<table>
<thead>
<tr>
<th>Segment</th>
<th>From</th>
<th>To</th>
<th># of Lanes</th>
<th>Capacity</th>
<th>Volume</th>
<th>V/C Ratio</th>
<th>LOS</th>
</tr>
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<tbody>
<tr>
<td>Huntington Drive</td>
<td>Granada Avenue</td>
<td>Atlantic Boulevard</td>
<td>6</td>
<td>60,000</td>
<td>37,756</td>
<td>0.629</td>
<td>B</td>
</tr>
<tr>
<td>Garfield Avenue</td>
<td>Huntington Drive</td>
<td>Alhambra Road</td>
<td>4</td>
<td>40,000</td>
<td>19,896</td>
<td>0.497</td>
<td>A</td>
</tr>
<tr>
<td>Atlantic Boulevard</td>
<td>Huntington Drive</td>
<td>Alhambra Road</td>
<td>4</td>
<td>40,000</td>
<td>22,249</td>
<td>0.556</td>
<td>A</td>
</tr>
<tr>
<td>Alhambra Road</td>
<td>Fremont Avenue</td>
<td>Marengo Avenue</td>
<td>2</td>
<td>15,000</td>
<td>7,325</td>
<td>0.488</td>
<td>A</td>
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<tr>
<td>Alhambra Road</td>
<td>Atlantic Boulevard</td>
<td>Garfield Avenue</td>
<td>2</td>
<td>15,000</td>
<td>8,763</td>
<td>0.584</td>
<td>A</td>
</tr>
<tr>
<td>Fremont Avenue</td>
<td>Alhambra Road</td>
<td>Main Street</td>
<td>4</td>
<td>40,000</td>
<td>32,191</td>
<td>0.805</td>
<td>D</td>
</tr>
<tr>
<td>Atlantic Boulevard</td>
<td>Alhambra Road</td>
<td>Main Street</td>
<td>4</td>
<td>40,000</td>
<td>24,622</td>
<td>0.616</td>
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<td>Chapel Street</td>
<td>Alhambra Road</td>
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<td>15,000</td>
<td>5,325</td>
<td>0.355</td>
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<tr>
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<td>4,378</td>
<td>0.292</td>
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<td>Alhambra Road</td>
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<td>6,776</td>
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<td>Main Street</td>
<td>Commonwealth Avenue</td>
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<td>40,000</td>
<td>33,437</td>
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<td>D</td>
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<td>Marengo Avenue</td>
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<td>10,561</td>
<td>0.264</td>
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<td>Main Street</td>
<td>Marengo Avenue</td>
<td>Atlantic Boulevard</td>
<td>4</td>
<td>40,000</td>
<td>23,960</td>
<td>0.599</td>
<td>A</td>
</tr>
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<td>Main Street</td>
<td>Atlantic Boulevard</td>
<td>Chapel Street</td>
<td>4</td>
<td>40,000</td>
<td>23,926</td>
<td>0.598</td>
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</tr>
<tr>
<td>Poplar Boulevard</td>
<td>West City Limits</td>
<td>Fremont Avenue</td>
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<td>15,000</td>
<td>5,933</td>
<td>0.396</td>
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<td>Woodward Avenue</td>
<td>Mission Road</td>
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<td>40,000</td>
<td>27,546</td>
<td>0.689</td>
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<td>Concord Avenue</td>
<td>West City Limits</td>
<td>Fremont Avenue</td>
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<td>15,000</td>
<td>3,651</td>
<td>0.243</td>
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</tr>
<tr>
<td>Fremont Avenue</td>
<td>Concord Avenue</td>
<td>Valley Boulevard</td>
<td>4</td>
<td>40,000</td>
<td>45,004</td>
<td>1.125</td>
<td>F</td>
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<td>Fremont Avenue</td>
<td>Atlantic Boulevard</td>
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<td>Atlantic Boulevard</td>
<td>Garfield Avenue</td>
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<td>0.633</td>
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</tr>
<tr>
<td>Marengo Avenue</td>
<td>Mission Road</td>
<td>Valley Boulevard</td>
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<td>15,000</td>
<td>13,690</td>
<td>0.913</td>
<td>E</td>
</tr>
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<td>Marengo Avenue</td>
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<td>40,000</td>
<td>22,234</td>
<td>0.556</td>
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</tr>
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<td>Marengo Avenue</td>
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<td>0.725</td>
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<td>New Avenue</td>
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<td>30,612</td>
<td>0.765</td>
<td>C</td>
</tr>
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<td>Atlantic Boulevard</td>
<td>Valley Boulevard</td>
<td>Hellman Avenue</td>
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<td>45,212</td>
<td>1.130</td>
<td>F</td>
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<td>36,984</td>
<td>0.925</td>
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<td>0.515</td>
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<td>Atlantic Boulevard</td>
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<td>5,096</td>
<td>0.340</td>
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<td>I-10 Freeway</td>
<td>Garvey Avenue</td>
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<td>12,935</td>
<td>0.862</td>
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</tbody>
</table>

Source: KOA Corporation 2017 (Appendix F)
Figure 39 Existing Daily Traffic Volumes

Source: KOA Corporation
c. Existing Transit Facilities

The Plan Area is well served by public transportation. Fixed-route bus services are provided by the Los Angeles County Metropolitan Transportation Authority (Metro), Montebello Bus Lines (MBL), Alhambra Community Transit (ACT), and dial-a-ride service. The dial-a-ride service is an advance reservation, shared ride transportation service for senior residents or disabled of any age and their attendants. The transit services collectively provide travel alternatives to the private automobile.

The City of Alhambra operates two fixed-route transit lines, the ACT Green Line and the ACT Blue Line. The Green Line circulates within the City via Main Street, providing services to schools, shopping centers, and parks during normal business hours from Monday to Saturday. The Blue Line service begins at the Civic Center and ends at the California State University Los Angeles campus, and operates from Monday to Friday only. Table 32 summarizes the service characteristics of the existing transit lines within the Plan Area. Figure 40 illustrates the routes of these lines.

Table 32 Characteristics of Existing Public Transit Service in the Plan Area

<table>
<thead>
<tr>
<th>Agency</th>
<th>Line</th>
<th>To</th>
<th>From</th>
<th>Via</th>
<th>Peak Period Frequency (minutes)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACT</td>
<td>Blue</td>
<td>Cal State LA Metrolink Station</td>
<td>Chapel St/Main St</td>
<td>Fremont Ave/Main St/Almansor St/Valley Blvd</td>
<td>20</td>
</tr>
<tr>
<td>ACT</td>
<td>Green</td>
<td>Circulator</td>
<td></td>
<td>Fremont Ave/Main St/Almansor St/Valley Blvd</td>
<td>20</td>
</tr>
<tr>
<td>Metro</td>
<td>70</td>
<td>Downtown Los Angeles</td>
<td>El Monte</td>
<td>Garvey Ave</td>
<td>12</td>
</tr>
<tr>
<td>Metro</td>
<td>76</td>
<td>Downtown Los Angeles</td>
<td>El Monte</td>
<td>Valley Blvd</td>
<td>15</td>
</tr>
<tr>
<td>Metro</td>
<td>78</td>
<td>Downtown Los Angeles</td>
<td>Arcadia</td>
<td>Las Tunas Dr/Huntington Dr</td>
<td>20</td>
</tr>
<tr>
<td>Metro</td>
<td>176</td>
<td>Highland Park</td>
<td>El Monte Station</td>
<td>Mission St/Dr, Tyler Ave/Rush St</td>
<td>45</td>
</tr>
<tr>
<td>Metro</td>
<td>258</td>
<td>Alhambra</td>
<td>Paramount</td>
<td>Fremont Ave/Eastern Ave</td>
<td>40</td>
</tr>
<tr>
<td>Metro</td>
<td>260</td>
<td>Pasadena</td>
<td>Artesia Blue Line Station</td>
<td>Fair Oaks Ave/Atlantic Blvd</td>
<td>14.5</td>
</tr>
<tr>
<td>Metro</td>
<td>485</td>
<td>Downtown Los Angeles</td>
<td>Altadena</td>
<td>Fremont Ave &amp; Lake Ave</td>
<td>36</td>
</tr>
<tr>
<td>Metro</td>
<td>487</td>
<td>Downtown Los Angeles</td>
<td>Sierra Madre Villa Station</td>
<td>New Ave/Ramona St</td>
<td>18</td>
</tr>
<tr>
<td>Metro</td>
<td>762</td>
<td>Pasadena</td>
<td>Artesia Blue Line Station</td>
<td>Fair Oaks Ave/Atlantic Blvd</td>
<td>24</td>
</tr>
<tr>
<td>MBL</td>
<td>30</td>
<td>San Marino</td>
<td>Montebello</td>
<td>Garfield Ave</td>
<td>45</td>
</tr>
</tbody>
</table>
Figure 40 Local Transit Routes
Bicycle Facilities

Caltrans has developed statewide standards and definitions for the planning, design and implementation of bicycle facilities. The following is a summary of these standards. The class numbering standard is being phased out, to some extent, as the name of the facility type becomes more commonplace.

- **Class I (Bicycle Path).** A bicycle path is a special facility that is designed exclusively for the use of bicycles. They are physically separated from motor vehicle traffic by a physical barrier or landscaped area. Bicycle paths are more often used for recreation and are generally provided along river channels and former railroad rights-of-way. Some bicycle lane facilities denote the lane with both striping and with color shading within the lane, or color shading at conflict points such as intersections and driveways.

- **Class II (Bicycle Lane).** A bicycle lane is a facility where a portion of the paved roadway area is marked as a special lane for use by bicycles only. It is identified by signage along the street that denotes “Bike Lane”, pavement markings and lane line markings. Motor vehicles are prohibited from driving in bike lanes except when turning to and from driveways, intersections, or on-street parking.

- **Class III (Bicycle Route).** A bicycle route is defined as a bicycle way designated within a public right-of-way. The purpose of the bicycle route is to encourage a sharing of the roadway between vehicles and bicycles. They are identified by signage along the street that denotes “Bike Route.” No other pavement markings are employed with these facilities. A bicycle boulevard is an enhanced Class III facility. The purpose of the bicycle boulevard is to more visibly denote the sharing of a roadway by vehicles and bicycles. They are typically identified by signage along the street that depicts a bicycle with text that denotes “Share the Road”, and also by roadway striping that shows a bicycle with chevrons/arrows denoting a shared lane. Some bicycle boulevards denote the lane sharing with color-shaded lane, or color-shading at conflict points such as intersections and driveways. Traffic calming measures along the corridor, and enhanced directional signage, are often a part of the implementation of such facilities.

- **Class IV (Separated Bicycle Lane).** This is a newer facility designation. These are often called cycle tracks. With this treatment, a facility is provided where the bicycle lane is located between the sidewalk and either on-street parking or a travel lane and separated by a curb or median or other barrier. These facilities require special treatments at intersections, depending upon the setback from the travel lane and visibility issues.

Non-motorized transportation includes bicycle and pedestrian facilities. Currently, formal bicycle facilities are not provided within the City limits. The text below discusses bicycle facilities that are currently available to bicyclists in the vicinity of Alhambra.

- **Huntington Drive.** From within the City of Los Angeles, a bicycle lane facility (one side of the roadway only) on this arterial roadway connects to the northwest corner of Alhambra.

- **Marengo Avenue.** From within the City of South Pasadena, a bicycle lane facility on this local residential roadway connects to the north end of Alhambra.

- **Alhambra Avenue.** From within the City of Monterey Park, a bicycle lane facility on this local roadway connected to the south end of Alhambra.
Other bicycle paths and bicycle lanes are also proposed to be implemented in the future, within the neighboring cities surrounding Alhambra.

d. Planned Bicycle Facilities

Based on a geometric review of roadway cross-sections throughout Alhambra, the draft Alhambra Bicycle Master Plan (February 2013), and input during public workshops carried out as part of the development of the Plan, a future network of bicycle facilities within the City, including bikeways and recommended bicycle parking locations, has been defined. This network is illustrated on Figure 41.

This network would include the following Class II bicycle facilities:

- **Huntington Drive.** Class II bicycle lanes would be provided on the City of Alhambra side of this divided roadway, roughly between Maycrest Avenue and Alhambra Road.
- **West Main Street.** Class II bicycle lanes would be provided on this divided roadway, linking to the lanes on Huntington Drive and continuing to Raymond Avenue on the east.
- **Marengo Avenue.** Class II bicycle lanes would be provided within limited segments where geometry permits north of Mission Road and between Valley Boulevard and the I-10 freeway.

e. Regulatory Setting

This section summarizes applicable municipal plans and regulations that apply to the Plan Area. This information provides a context for the impact discussion related to the Plan’s consistency with applicable policies, plans, laws and regulations.

**Federal**

The US Department of Transportation (US DOT) provides a number of grant programs, primarily for the construction and upgrading of major highways and transit facilities. Many of these grants are administered by the state and regional governments. Use of federal grant funding also invokes the National Environmental Protection Act (NEPA) in some cases. The Federal Highway Administration (FHWA) sets design standards (such as interchange spacing) for interstate highways such as the I-10 and I-710 freeways. The Federal Railroad Administration (FRA) within the US DOT establishes safety rules regarding the operation of railroads (e.g., maximum train speeds, maximum allowed highway crossing blockage time).

**State Policies and Regulations**

The California Department of Transportation (Caltrans) has jurisdiction over state highways. Caltrans constructs and maintains all state highways, and sets design standards that are often copied by local government. SCAG is the state-designated metropolitan planning organization for six of the 10 counties in Southern California, including Los Angeles County. SCAG has authority for regional planning, distributing and administering federal and state funds for all modes of transportation, and assuring that projects are consistent with the Regional Transportation Plan (RTP).
Figure 41 Existing and Proposed Bicycle Facilities
Caltrans Authority over the State Highway System

Caltrans is responsible for planning, design, construction and maintenance of all interstate freeways and state routes. It sets design standards that are often used by local governments. Caltrans requirements are described in their Guide for Preparation of Traffic Impact Studies (Caltrans 2002), which covers the information needed for Caltrans to review impacts to State highway facilities, including freeway and arterial segments, on- and off-ramps, and signalized intersections.

Caltrans builds, maintains, and operates the State Highway system in California, with a goal to allow for the safe and efficient use of the State transportation system for all users. Caltrans has set standards for the operational goals of its facilities pertaining to intersection, arterial segment, and freeway segment level of service. These standards are set forth in the Caltrans Guide for the Preparation of Traffic Impact Studies. This document establishes procedures to uniformly review the operational standards of Caltrans-maintained facilities in terms of measures of effectiveness.

Statewide Transportation Improvement Plan

The Statewide Transportation Improvement Plan (STIP) is a capital improvement program that plans transportation projects related to state facilities in California for the next five years. The program is updated every two years with new construction projects as more funding is provided. The California Transportation Commission approves the fund estimate and then Caltrans and regional planning agencies submit plans for transportation improvement projects. If the projects are programmed in the STIP, then relevant agencies can begin the implementation process.

California's Complete Streets Law

The Complete Streets Law was signed into law by Governor Schwarzenegger as Assembly Bill 1358. It requires that cities plan for the needs of all users, including bicyclists and pedestrians, when updating local general plans. Caltrans specifically adopted Deputy Directive 64, which addresses the needs of people of all ages and abilities concerning transportation planning. It also recognizes that transportation improvement projects are opportunities to improve safety, access, and mobility for motorists, bicyclists, pedestrians, and transit users. The Complete Streets Implementation Action Plan provides an overview of the program (Caltrans 2010).

Regional Policies and Regulations

Congestion Management Plan

The Congestion Management Plan (CMP) was created statewide by Proposition 111 and was implemented locally by Metro. The CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed. A specific system of arterial roadways, plus all freeways, comprises the CMP system. Per CMP Transportation Impact Analysis (TIA) Guidelines, a traffic impact analysis is conducted where:

- At CMP arterial monitoring intersections, including freeway on-ramps or off-ramps, where the proposed project will add 50 or more vehicle trips during either a.m. or p.m. weekday peak hours.
- At CMP mainline freeway-monitoring locations, where the project will add 150 or more trips, in either direction, during the either the a.m. or p.m. weekday peak hours.
4.12.2 Impact Analysis

a. Methodology and Significance Thresholds

The City of Alhambra has adopted traffic impact thresholds defined by the County of Los Angeles Department of Public Works Traffic Impact Analysis Report Guidelines. Those guidelines are followed in this report for LOS and significant impact calculations.

The following text describes the methodology applied to the traffic analysis. The year 2040 was chosen as the year for the future conditions analysis, as this year is defined as the buildout year within the current SCAG regional travel demand model, and is also the planning horizon year of the Plan.

Study Scenarios

Weekday a.m. and p.m. peak-hour traffic operations were evaluated at the study intersections for the following traffic scenarios. Cumulative traffic impacts are determined by a comparison of the first and third scenarios. Plan traffic impacts are determined by a comparison of the second and third scenarios:

- Existing (2017) Conditions
- Future (2040) Without Plan Conditions
- Future (2040) With Plan Conditions

The Los Angeles County traffic study guidelines define significant impacts by comparisons of conditions under the without-project (without Plan) and with-project (with Plan) scenarios.

The proposed project being analyzed by this document is the program-level concept of the Plan represented by the Plan’s land use map. The land use authorized by adoption of this proposed land use plan would be implemented through new private development and revitalization of older uses.

Plan impacts were analyzed based on the incremental but cumulative traffic impacts of all Plan land use intensity/use changes. Growth rates and cumulative development assumptions for Future Without-Plan conditions are discussed within Section 4.12.1b, Existing Traffic Volumes and Levels of Service.

Land Use Plan Data Analysis

Under the Plan, residential land use growth will be focused in areas designated by the City’s current Housing Element update, and new commercial and medical-office development will be focused in areas designated as focus areas for new development in the proposed land use plan. Plan land use was analyzed by traffic analysis zone (TAZ), based on the location of these focus areas, with corresponding land use intensity reductions assumed throughout other areas of the City with implementation of the proposed land use plan. In other words, consistent with the Plan, it was assumed that future growth would occur mostly within these focus areas, rather than more evenly spread throughout the City.

A traffic analysis zone (TAZ) is constituted by one or more census blocks from the United States Census. TAZs were defined as part of the 1990 Census within the Census Transportation Planning Package (CTPP). The Plan Area analysis zones are based on these TAZs, but customized to analyze smaller segments of the Plan Area.
Significant Impact Calculations

This traffic impact analysis includes assessment of weekday a.m. and p.m. peak hour traffic impacts at 45 intersections and 34 roadway segments. Under CEQA, significant impacts of the Plan must be mitigated to a less than significant level, unless a statement of overriding considerations (SOC) is adopted by the City as part of Plan approval.

The following criteria are based on Appendix G of the State CEQA Guidelines. Impacts would be significant if the Plan would:

1. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit
2. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads and highways
3. Result in a change in traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks
4. Substantially increase traffic hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)
5. Result in inadequate emergency access
6. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities

Project and Cumulative Impacts

<table>
<thead>
<tr>
<th>Threshold 1:</th>
<th>Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact T-1 :</td>
<td>TRAFFIC GENERATED AS A RESULT OF DEVELOPMENT FACILITATED BY THE PLAN WOULD DEGRADE OPERATIONS AT 21 INTERSECTIONS TO BELOW IDENTIFIED SIGNIFICANCE THRESHOLDS. BECAUSE FEASIBLE MITIGATION IS NOT AVAILABLE AT 20 OF 21 INTERSECTIONS, IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.</td>
</tr>
</tbody>
</table>

Analyses of future (2040) conditions, without and with the Plan, were performed to study how the Plan Area’s transportation system would operate under future conditions and with the implementation of the Plan.

Significant Impact Standards

A significant impact is normally defined when new vehicle trips generated by a specific project or groups of projects would cause LOS values, volume-to-capacity ratios, or other measured variables
to deteriorate below a minimum acceptable threshold or increase by a set maximum amount. These thresholds and maximums are specified by the local agency.

The performance standards used to evaluate traffic volumes and design capacities on the Plan Area roadway system were based on peak-hour operations of the analyzed intersections. The significant impact standards applied to this analysis are defined below.

The City of Alhambra traffic impact guidelines are based on the County of Los Angeles traffic study guidelines. By the County of Los Angeles impact criteria, a project impact is considered to be significant if the project-related increase in the V/C ratio equals or exceeds the threshold shown in Table 33.

**Table 33  City of Alhambra Thresholds of Significance**

<table>
<thead>
<tr>
<th>Level of Service</th>
<th>Without-Project V/C*</th>
<th>Project Related V/C Increase</th>
</tr>
</thead>
<tbody>
<tr>
<td>C</td>
<td>0.710 to 0.800</td>
<td>Equal to or greater than 0.04</td>
</tr>
<tr>
<td>D</td>
<td>0.810 to 0.900</td>
<td>Equal to or greater than 0.02</td>
</tr>
<tr>
<td>E and F</td>
<td>0.910 or more</td>
<td>Equal to or greater than 0.010</td>
</tr>
</tbody>
</table>

*Without-project V/C is based on future volumes with ambient growth only*

In addition, a significant impact occurs at a signalized study intersection when the addition of project-generated trips causes the study intersection peak hour level of service to change from acceptable operation (LOS A, B, C, or D) to deficient operation (LOS E or F).

**Future Intersection Operations**

Intersection peak-hour performance and level of service values for the Future Without Plan and Future With Plan scenarios are summarized in Table 34.

Under this scenario, the change in V/C ratio at the following 14 intersections equals or exceeds the City’s V/C ratio threshold for significance during one or both of the analyzed peak hours:

- Atlantic Boulevard & Huntington Drive
- Atlantic Boulevard & Garfield Avenue
- Fremont Avenue & Alhambra Road
- Raymond Avenue/Palm Avenue & Main Street
- Atlantic Boulevard & Main Street
- Garfield Avenue & Main Street
- Fremont Avenue & Mission Road
- Marengo Avenue & Mission Road
- Atlantic Boulevard & Mission Road
- Fremont Avenue & Valley Boulevard
- Garfield Avenue & Valley Boulevard
- Garfield Avenue & Norwood Place
- Garfield Avenue & Glendon Way
- Fremont Avenue & Hellman Avenue
- Fremont Avenue & Montezuma Avenue
## Table 34 Intersection Level of Service for Future (2040) Conditions, without and with the Plan

<table>
<thead>
<tr>
<th>Study Intersections</th>
<th>AM Peak Hour</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Granada Ave &amp; Huntington Dr</td>
<td>0.758</td>
<td>C</td>
<td>0.763</td>
<td>C</td>
<td>0.005</td>
<td>No</td>
<td>0.875</td>
<td>D</td>
<td>0.854</td>
<td>D</td>
<td>-0.021</td>
<td>No</td>
<td>0.953</td>
</tr>
<tr>
<td>Atlantic Blvd &amp; Huntington Dr</td>
<td>0.768</td>
<td>C</td>
<td>0.780</td>
<td>C</td>
<td>0.012</td>
<td>No</td>
<td>0.953</td>
<td>E</td>
<td>0.986</td>
<td>E</td>
<td>0.033</td>
<td>Yes</td>
<td>0.679</td>
</tr>
<tr>
<td>Garfield Ave &amp; Huntington Dr</td>
<td>0.736</td>
<td>C</td>
<td>0.736</td>
<td>C</td>
<td>0.000</td>
<td>No</td>
<td>0.679</td>
<td>B</td>
<td>0.679</td>
<td>B</td>
<td>0.000</td>
<td>No</td>
<td>0.880</td>
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<td>Atlantic Blvd &amp; Garfield Ave</td>
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<td>D</td>
<td>0.841</td>
<td>D</td>
<td>0.006</td>
<td>No</td>
<td>0.880</td>
<td>D</td>
<td>0.977</td>
<td>E</td>
<td>0.097</td>
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<td>0.983</td>
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<td>Atlantic Blvd &amp; Pine St</td>
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<td>A</td>
<td>0.531</td>
<td>A</td>
<td>0.003</td>
<td>No</td>
<td>0.561</td>
<td>A</td>
<td>0.549</td>
<td>A</td>
<td>-0.012</td>
<td>No</td>
<td>0.762</td>
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<td>Garfield Ave &amp; Pine St</td>
<td>0.477</td>
<td>A</td>
<td>0.481</td>
<td>A</td>
<td>0.004</td>
<td>No</td>
<td>0.501</td>
<td>A</td>
<td>0.573</td>
<td>A</td>
<td>0.072</td>
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<td>0.599</td>
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<tr>
<td>Fremont Ave &amp; Alhambra Rd</td>
<td>1.054</td>
<td>F</td>
<td>1.088</td>
<td>F</td>
<td>0.034</td>
<td>Yes</td>
<td>0.983</td>
<td>E</td>
<td>0.942</td>
<td>E</td>
<td>-0.041</td>
<td>No</td>
<td>0.711</td>
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<tr>
<td>Atlantic Blvd &amp; Alhambra Rd</td>
<td>0.580</td>
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<td>No</td>
<td>0.599</td>
<td>A</td>
<td>0.594</td>
<td>A</td>
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<tr>
<td>Garfield Ave &amp; Alhambra Rd</td>
<td>0.691</td>
<td>B</td>
<td>0.744</td>
<td>C</td>
<td>0.053</td>
<td>No</td>
<td>0.750</td>
<td>C</td>
<td>0.745</td>
<td>C</td>
<td>-0.005</td>
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<tr>
<td>3rd St &amp; Main St</td>
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<td>0.026</td>
<td>No</td>
<td>0.528</td>
<td>A</td>
<td>0.633</td>
<td>B</td>
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<td>Palm Ave/Poplar Blvd &amp; Main St</td>
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<td>A</td>
<td>0.592</td>
<td>A</td>
<td>-0.001</td>
<td>No</td>
<td>0.667</td>
<td>B</td>
<td>0.658</td>
<td>B</td>
<td>-0.009</td>
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<tr>
<td>Raymond Ave/Palm Ave &amp; Main St</td>
<td>0.734</td>
<td>C</td>
<td>0.736</td>
<td>C</td>
<td>0.002</td>
<td>No</td>
<td>1.089</td>
<td>F</td>
<td>1.078</td>
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<td>Marengo Ave &amp; Main St</td>
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<td>A</td>
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<td>Study Intersections</td>
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<td>Future without Plan</td>
<td>Future with Plan</td>
<td>ICU Change</td>
<td>Sig. Impact?</td>
<td>Future without Plan</td>
<td>Future with Plan</td>
<td>ICU Change</td>
<td>Sig. Impact?</td>
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<td>ICU Change</td>
<td>Sig. Impact?</td>
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<td>LOS</td>
<td>ICU</td>
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<td>ICU Change</td>
<td>Sig. Impact?</td>
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<td>0.699</td>
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<td>0.742</td>
<td>C</td>
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<td>No</td>
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<td>0.715</td>
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<td>Almansor St &amp; Main St</td>
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<td>B</td>
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<td>Fremont Ave &amp; Commonwealth Ave</td>
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<td>C</td>
<td>0.002</td>
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<tr>
<td>Marengo Ave &amp; Mission Rd</td>
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<td>D</td>
<td>0.914</td>
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### City of Alhambra
### Alhambra General Plan

#### Study Intersections

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Source: KOA Corporation 2017 (Appendix F)
This scenario compares the potential effects of the Plan in the Future (2040) scenario to conditions expected in that year without implementation of the Plan, showing the effect that implementation of the Plan, by itself, would have on traffic conditions by the year 2040. For purposes of CEQA analysis, however, the effect of a project must be compared to existing conditions. Therefore, the analysis in the next section compares existing conditions to the Future with Plan scenario, thus taking into account not only the effects of the Plan itself, but the effects of all future growth (cumulative conditions) by the year 2040, compared to existing conditions.

**Existing Conditions versus Future Cumulative Conditions**

Table 35 defines significant cumulative impacts of area growth plus Plan land uses at the study intersections, by the future analysis year of 2040.

Under this scenario, the change in V/C ratio at the following 21 intersections equals or exceeds the City’s V/C ratio threshold for significance during one or both of the analyzed peak hours:

- Granada Avenue & Huntington Drive
- Atlantic Boulevard & Huntington Drive
- Atlantic Boulevard & Garfield Avenue
- Fremont Avenue & Alhambra Road
- Atlantic Boulevard & Main Street
- Garfield Avenue & Main Street
- Fremont Avenue & Orange Street
- Fremont Avenue & Mission Road
- Marengo Avenue & Mission Road
- Atlantic Boulevard & Mission Road
- Garfield Avenue & Mission Road
- Fremont Avenue & Valley Boulevard
- Atlantic Boulevard & Valley Boulevard
- Garfield Avenue & Valley Boulevard
- New Avenue & Valley Boulevard
- Garfield Avenue & Norwood Place
- Atlantic Boulevard & Glendon Way
- Garfield Avenue & Glendon Way
- Fremont Avenue & Hellman Avenue
- Fremont Avenue & Montezuma Avenue
- Garfield Avenue & Hellman Avenue

Therefore, impacts would be significant without mitigation.
### Table 35 Intersection Level of Service, Existing Conditions Compared to Future (2040) Cumulative Conditions with Plan

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# Environmental Impact Analysis

## Transportation/Traffic

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<td>Garfield Ave &amp; Norwood Pl</td>
<td>0.692</td>
<td>B</td>
<td>0.733</td>
<td>C</td>
<td>0.041</td>
<td>No</td>
<td>0.719</td>
<td>C</td>
<td>0.837</td>
<td>D</td>
<td>0.118</td>
<td>Yes</td>
</tr>
<tr>
<td>Atlantic Blvd &amp; Glendon Way</td>
<td>1.036</td>
<td>F</td>
<td>1.077</td>
<td>F</td>
<td>0.041</td>
<td>Yes</td>
<td>0.858</td>
<td>D</td>
<td>0.846</td>
<td>D</td>
<td>-0.012</td>
<td>No</td>
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<tr>
<td>Garfield Ave &amp; Glendon Way</td>
<td>0.841</td>
<td>D</td>
<td>0.888</td>
<td>D</td>
<td>0.047</td>
<td>Yes</td>
<td>0.867</td>
<td>D</td>
<td>0.991</td>
<td>E</td>
<td>0.124</td>
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<tr>
<td>Fremont Ave &amp; Hellman Ave</td>
<td>0.710</td>
<td>C</td>
<td>0.778</td>
<td>C</td>
<td>0.068</td>
<td>Yes</td>
<td>0.788</td>
<td>C</td>
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<td>C</td>
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<td>D</td>
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<td>D</td>
<td>0.880</td>
<td>D</td>
<td>0.031</td>
<td>Yes</td>
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</table>

Source: KOA Corporation 2017 (Appendix F)
Future Roadway Segment Operations

The TIA applied regional growth for year 2040 was applied to the 34 study roadway segments. The City has no standards or thresholds for project impacts to roadway segments. Thus the following analysis is for informational purposes only. The roadway segments peak-hour performance and level of service values for the future without-project and future with-project scenarios are summarized in Table 36.

The following four roadway segments would operate at LOS E or F under the future without-project scenario:

- Fremont Avenue between Concord Avenue and Valley Boulevard
- Marengo Avenue between Mission Road and Valley Boulevard
- Atlantic Boulevard between Valley Boulevard and Hellman Avenue
- Garfield Avenue between Valley Boulevard and Hellman Avenue

Daily traffic volumes under future 2040 without-Project conditions are provided on Figure 42.

The following roadway segments would operate at LOS E or F under the future with-project scenario:

- Fremont Avenue between Concord Avenue and Valley Boulevard
- Atlantic Boulevard between Valley Boulevard and Hellman Avenue
- Garfield Avenue between Valley Boulevard and Hellman Avenue
- Fremont Avenue between the I-10 Freeway and Garvey Avenue

Daily traffic volumes under future 2040 with-project conditions are provided on Figure 43.
### Table 36  Roadway Segment Level of Service for Future (2040) Conditions, without and with the Plan

<table>
<thead>
<tr>
<th>Segment</th>
<th>From</th>
<th>To</th>
<th>Capacity</th>
<th>Future without Plan</th>
<th>Future with Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Volume</td>
<td>V/C Ratio</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>39,188</td>
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<td></td>
<td></td>
<td></td>
<td>39,634</td>
<td>0.661</td>
</tr>
<tr>
<td>Huntington Drive</td>
<td>Granada Avenue</td>
<td>Atlantic Boulevard</td>
<td>60,000</td>
<td>20,650</td>
<td>0.516</td>
</tr>
<tr>
<td></td>
<td></td>
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<td></td>
<td>21,584</td>
<td>0.540</td>
</tr>
<tr>
<td>Garfield Avenue</td>
<td>Huntington Drive</td>
<td>Alhambra Road</td>
<td>40,000</td>
<td>23,933</td>
<td>0.577</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>23,081</td>
<td>0.577</td>
</tr>
<tr>
<td>Atlantic Boulevard</td>
<td>Huntington Drive</td>
<td>Alhambra Road</td>
<td>40,000</td>
<td>9,096</td>
<td>0.606</td>
</tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>9,074</td>
<td>0.605</td>
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<td>Alhambra Road</td>
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<td>Marengo Avenue</td>
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<td>6,700</td>
<td>0.447</td>
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<td>0.606</td>
</tr>
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<td></td>
<td></td>
<td></td>
<td>9,074</td>
<td>0.605</td>
</tr>
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<td>Fremont Avenue</td>
<td>Alhambra Road</td>
<td>Main Street</td>
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<td>32,360</td>
<td>0.809</td>
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<td></td>
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<td>31,868</td>
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<td>Atlantic Boulevard</td>
<td>Alhambra Road</td>
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<td>24,751</td>
<td>0.619</td>
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<td></td>
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<td></td>
<td>24,567</td>
<td>0.614</td>
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<td>Alhambra Road</td>
<td>Main Street</td>
<td>15,000</td>
<td>5,527</td>
<td>0.368</td>
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<td></td>
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<td></td>
<td>5,527</td>
<td>0.368</td>
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<tr>
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<td></td>
<td>4,544</td>
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<td>0.265</td>
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<td>0.251</td>
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<td>9,479</td>
<td>0.632</td>
</tr>
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<td>Mission Road</td>
<td>Valley Boulevard</td>
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<td>0.525</td>
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<td></td>
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<td>7,874</td>
<td>0.525</td>
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<td>Mission Road</td>
<td>Valley Boulevard</td>
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<td>12,767</td>
<td>0.851</td>
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<td>Marengo Avenue</td>
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<td>22,607</td>
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<td>22,087</td>
<td>0.552</td>
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## Environmental Impact Analysis

### Transportation/Traffic

<table>
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<th>From</th>
<th>To</th>
<th>Capacity</th>
<th>Volume</th>
<th>V/C Ratio</th>
<th>LOS</th>
<th>Volume</th>
<th>V/C Ratio</th>
<th>LOS</th>
</tr>
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<tr>
<td>Valley Boulevard</td>
<td>Marengo Avenue</td>
<td>Atlantic Boulevard</td>
<td>40,000</td>
<td>29,759</td>
<td>0.744</td>
<td>C</td>
<td>29,475</td>
<td>0.737</td>
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<td>31,422</td>
<td>0.786</td>
<td>C</td>
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<td>Valley Boulevard</td>
<td>Hellman Avenue</td>
<td>40,000</td>
<td>46,408</td>
<td>1.160</td>
<td>F</td>
<td>45,846</td>
<td>1.146</td>
<td>F</td>
</tr>
<tr>
<td>Garfield Avenue</td>
<td>Valley Boulevard</td>
<td>Hellman Avenue</td>
<td>40,000</td>
<td>37,963</td>
<td>0.949</td>
<td>E</td>
<td>39,068</td>
<td>0.977</td>
<td>E</td>
</tr>
<tr>
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<td>Garfield Avenue</td>
<td>Almansor Street</td>
<td>15,000</td>
<td>6,612</td>
<td>0.441</td>
<td>A</td>
<td>6,612</td>
<td>0.441</td>
<td>A</td>
</tr>
<tr>
<td>Hellman Avenue</td>
<td>West City Limits</td>
<td>Fremont Avenue</td>
<td>15,000</td>
<td>7,796</td>
<td>0.520</td>
<td>A</td>
<td>7,572</td>
<td>0.505</td>
<td>A</td>
</tr>
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<td>I-10 Freeway</td>
<td>Atlantic Boulevard</td>
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<td>5,145</td>
<td>0.343</td>
<td>A</td>
</tr>
<tr>
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<td>I-10 Freeway</td>
<td>Garvey Avenue</td>
<td>15,000</td>
<td>13,061</td>
<td>0.871</td>
<td>D</td>
<td>14,591</td>
<td>0.973</td>
<td>E</td>
</tr>
</tbody>
</table>

Source: KOA Corporation 2017 (Appendix F)
Figure 42 Future (2040) Without-Project Daily Traffic Volumes
Figure 43 Future (2040) With-Project Daily Traffic Volumes
Mitigation Measures

Potential physical mitigation measures were researched at all of the significantly-impacted intersections. For the significantly impacted study intersections, potential mitigation measures that could be implemented over the timespan of the Plan were reviewed at a conceptual level of engineering detail. Potential improvement measures were evaluated based on either potential approach lane additions or traffic signal configuration changes that might improve operations. However, unless roadway widening was deemed acceptable to the City (which could require purchase and partial or full demolition of neighboring properties, or could negatively affect sidewalk widths), or unless on-street parking removal would be acceptable, improvements at all but one location were deemed infeasible due to physical limitations and/or due to the estimated ineffectiveness of traffic signal configurations changes. Therefore, only the following mitigation measure is recommended:

T-1    Fremont Avenue/Orange Street

Widen the westbound approach of the Fremont Avenue/Orange Street intersection to provide an additional lane for traffic.

Significance After Mitigation

Fremont Avenue/Orange Street

Implementation of Mitigation Measure T-1 would reduce the traffic delay caused by growth facilitated by the Plan, improving the amount of delay under the LOS D conditions of the Fremont Avenue/Orange Street intersection, as shown in Table 37. However, because feasible mitigation measures are not available to address impacts at the other 20 study intersections, impacts would be significant and unavoidable.

Table 37  Impacts to Fremont Avenue/Orange Street Intersection After Implementation of Mitigation Measure

<table>
<thead>
<tr>
<th>Study Intersections</th>
<th>Existing ICU</th>
<th>Future with-Plan ICU</th>
<th>ICU Change</th>
<th>Sig Impact?</th>
<th>With Mitigation ICU</th>
<th>ICU Change</th>
<th>Sig Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fremont Ave &amp; Orange St. (AM Peak Hour)</td>
<td>0.588</td>
<td>0.643</td>
<td>0.055</td>
<td>No</td>
<td>0.632</td>
<td>-0.011</td>
<td>No</td>
</tr>
<tr>
<td>Fremont Ave &amp; Orange St. (PM Peak Hour)</td>
<td>0.828</td>
<td>0.860</td>
<td>0.032</td>
<td>Yes</td>
<td>0.803</td>
<td>-0.057</td>
<td>No</td>
</tr>
</tbody>
</table>

Source: KOA Corporation 2017 (Appendix F)
Threshold 1: Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Impact T-2: Traffic generated by development facilitated by the Plan would degrade operations on the I-10 freeway corridor and on I-10 freeway off-ramps to below identified significance thresholds. Impacts would be significant and unavoidable.

Potential freeway facility impacts were considered per Caltrans traffic study guidelines. Existing volumes were compiled from Caltrans Traffic Census data, via Average Annual Daily Traffic (AADT) data reports from 2015, the most recent available data summarized by Caltrans. This data was cross-checked against volumes from the separate Caltrans Performance Measurement System and the Traffic Census data was the highest for the local freeway corridors.

Buildout volumes for the analyzed freeway links from SCAG’s 2016 RTP model were used to define year-2040 conditions. Trips from the Plan land use analysis (Impact T-1) were distributed to the analyzed freeway links and added to the future period analysis. This defined the future with Plan scenario.

The existing and future with Plan volumes for this analysis are shown in Table 38. Future without Plan volumes are also shown in Table 38, for reference, to illustrate the volumes added due to the Plan. The trip generation changes due to the incremental (net) development increase associated with the proposed land use plan would generate zero new trips, when examined on a citywide basis. Where positive trip increases in roadway corridors were identified to and from the analyzed freeway interchanges, they were included in the volume totals.

Table 38 Volume Data for I-10 and I-710 Segments in Alhambra Area

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>I-710 south of Valley Blvd *</td>
<td>83,996</td>
<td>85,352</td>
<td>85,992</td>
</tr>
<tr>
<td>I-10 between I-710 &amp; Fremont Ave</td>
<td>233,500</td>
<td>273,158</td>
<td>273,478</td>
</tr>
<tr>
<td>I-10 between Fremont Ave &amp; Atlantic Blvd</td>
<td>238,500</td>
<td>291,303</td>
<td>291,563</td>
</tr>
<tr>
<td>I-10 between Atlantic Blvd &amp; Garfield Ave</td>
<td>238,500</td>
<td>282,071</td>
<td>282,331</td>
</tr>
<tr>
<td>I-10 between Garfield Ave &amp; New Ave</td>
<td>245,000</td>
<td>281,573</td>
<td>281,833</td>
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<tr>
<td>I-10 east of New Ave</td>
<td>252,000</td>
<td>281,573</td>
<td>281,893</td>
</tr>
</tbody>
</table>

* For this segment location, the existing daily volume was taken from SCAG model data and not from Caltrans AADT data. The Caltrans volume value of 46,500 was determined based on trends at the other analyzed locations to be an anomaly in the data.

Freeway Mainline Highway Capacity Software Analysis

Freeway mainline LOS calculations were conducted, using the Highway Capacity Software (HCS) methodology, as the use of the Highway Capacity Methodology (HCM) provided by the HCS is required for analysis based on Caltrans traffic study guidelines. The Caltrans-published freeway mainline AADT volumes defined above, plus peak hour factors and directional proportions of flow as defined by Caltrans, were all used as inputs.
Table 39 summarizes the results of this analysis, for mainline I-710 and I-10 segments in the vicinity of Alhambra.

**Table 39 Freeway Mainline Daily LOS Calculations**

<table>
<thead>
<tr>
<th>Ramp Locations</th>
<th>Density (Cars/Mile/Lane)</th>
<th>LOS</th>
<th>Density (Cars/Mile/Lane)</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>I-710 south of Valley Blvd</td>
<td>7.7</td>
<td>A</td>
<td>14.0</td>
<td>B</td>
</tr>
<tr>
<td>I-10 between I-710 &amp; Fremont Ave</td>
<td>41.3</td>
<td>E</td>
<td>61.3</td>
<td>F</td>
</tr>
<tr>
<td>I-10 between Fremont Ave &amp; Atlantic Blvd</td>
<td>43.2</td>
<td>E</td>
<td>77.2</td>
<td>F</td>
</tr>
<tr>
<td>I-10 between Atlantic Blvd &amp; Garfield Ave</td>
<td>43.2</td>
<td>E</td>
<td>68.3</td>
<td>F</td>
</tr>
<tr>
<td>I-10 between Garfield Ave &amp; New Ave</td>
<td>45.8</td>
<td>E</td>
<td>67.9</td>
<td>F</td>
</tr>
<tr>
<td>I-10 east of New Ave</td>
<td>48.9</td>
<td>E</td>
<td>67.9</td>
<td>F</td>
</tr>
</tbody>
</table>

Source: KOA Corporation 2017 (Appendix F)

Under existing conditions, all but one of the analyzed freeway segments would operate at LOS E. All of the LOS E segments are in the I-10 freeway corridor. The level of service value would worsen from LOS E to LOS F with the addition of the new trips generated by area traffic growth and Plan land use (where positive trips would be generated) through the year 2040.

Cumulative growth with the Plan, at a program level, would create potentially adverse levels of service on the I-10 freeway mainline. Impacts would be significant.

**Freeway Off-Ramp Highway Capacity Manual Analysis**

New weekday peak-period turning movement counts were collected at the off-ramp study intersections on August 23, 2017 (Appendix F).

The existing count volumes were increased by annual growth rates defined by a comparison of baseline and buildout volumes for the adjacent analyzed freeway links from the SCAG 2016 RTP model. Trips from the Plan land use analysis were distributed to the analyzed freeway links and ramps, and added to the future period analysis. This defined the future with-project scenario, as also analyzed for the local study intersections within the City of Alhambra.

Table 40 provides an analysis of the area freeway off-ramp locations included in this study. Caltrans requires the use of the HCM methodology, which is based on average seconds of delay per approaching vehicle at the analyzed intersections. These values at partial stop-controlled intersections are based on the delay at the approaches where stop signs are present.
### Table 40 Freeway Off-Ramp Peak-Hour LOS Calculations

<table>
<thead>
<tr>
<th>Ramp Locations</th>
<th>Peak Hour</th>
<th>Existing</th>
<th>Future 2040 with Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Delay</td>
<td>LOS</td>
</tr>
<tr>
<td>I-710 NB Off Ramp &amp; Valley Blvd</td>
<td>AM</td>
<td>21.6</td>
<td>C</td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>21.5</td>
<td>C</td>
</tr>
<tr>
<td>I-10 WB Off Ramp &amp; Hellman Ave</td>
<td>AM</td>
<td>18.1</td>
<td>C</td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>26.9</td>
<td>D</td>
</tr>
<tr>
<td>Fremont Ave &amp; I-10 EB Off Ramp</td>
<td>AM</td>
<td>&gt;100</td>
<td>F</td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>&gt;100</td>
<td>F</td>
</tr>
<tr>
<td>NB Atlantic Blvd &amp; I-10 WB Off Ramp</td>
<td>AM</td>
<td>98.9</td>
<td>F</td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>&gt;100</td>
<td>F</td>
</tr>
<tr>
<td>NB Atlantic Blvd &amp; I-10 EB Off Ramp</td>
<td>AM</td>
<td>&gt;100</td>
<td>F</td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>&gt;100</td>
<td>F</td>
</tr>
<tr>
<td>NB Garfield Ave &amp; I-10 WB Off Ramp</td>
<td>AM</td>
<td>35.8</td>
<td>E</td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>77.4</td>
<td>F</td>
</tr>
<tr>
<td>NB Garfield Ave &amp; I-10 EB Off Ramp</td>
<td>AM</td>
<td>&gt;100</td>
<td>F</td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>&gt;100</td>
<td>F</td>
</tr>
<tr>
<td>I-10 WB Off Ramp &amp; Saxon Ave</td>
<td>AM</td>
<td>12.9</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>13.9</td>
<td>B</td>
</tr>
<tr>
<td>New Ave &amp; I-10 EB Off Ramp</td>
<td>AM</td>
<td>22.9</td>
<td>C</td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>32.6</td>
<td>D</td>
</tr>
</tbody>
</table>

Source: KOA Corporation 2017 (Appendix F)

Substantial cumulative impacts would occur at the seven ramp locations shown in Table 40. Impacts would be significant without mitigation.

### Mitigation Measures

Within the I-10 freeway corridor, LOS for mainline operations would worsen from LOS E to LOS F with the addition of the new trips generated by area traffic growth and Plan-related trips through the year 2040. Additionally, the Plan would contribute trips to seven I-10 freeway off-ramp locations that would worsen from LOS E to LOS F conditions or remain at LOS F conditions. Therefore, the following mitigation measure is recommended.

**T-2 I-10 Freeway Corridor and Off-Ramp Operations**

Future major projects within the Plan Area shall be reviewed for both localized impacts that overlap with identified locations of potential I-10 freeway corridor and off-ramp significant impacts. Projects that make a substantial contribution to a significant impact in these locations must make a fair-share contribution to freeway corridor improvements planned by Caltrans.

### Significance After Mitigation

Implementation of Mitigation Measure T-2 would reduce LOS impacts to the operation of the I-10 freeway corridor and off-ramps by future development in the Plan Area. However, because specific improvements have not been identified, and because the I-10 freeway and its ramps are State facilities controlled by Caltrans, the City cannot guarantee that any improvements, if necessary,
would be carried out in these locations. This impact would therefore remain significant and unavoidable.

**Threshold 2:** Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads and highways?

**Impact T-3:** Because the Plan would contribute more than 50 vehicle trips to the CMP arterial monitoring intersection of Fremont Avenue and Valley Boulevard, implementation of the Plan would conflict with an applicable congestion management program. Because there are no feasible mitigation measures at this intersection, this impact would be significant and unavoidable.

As discussed in Section 4.12.1e, the CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed. A specific system of arterial roadways plus all freeways comprises the CMP system. Per CMP Transportation Impact Analysis (TIA) Guidelines, a traffic impact analysis is conducted where:

- At CMP arterial monitoring intersections, including freeway on-ramps or off-ramps, the proposed project will add 50 or more vehicle trips during either a.m. or p.m. weekday peak hours
- At CMP mainline freeway-monitoring locations, the project will add 150 or more trips, in either direction, during the either the a.m. or p.m. weekday peak hours

The only CMP arterial monitoring intersection in Alhambra is Fremont Avenue and Valley Boulevard. Based on the analyzed Plan trip generation (as discussed in Section 2.7 in the TIA), traffic volume increases due to cumulative growth (including the Plan) would add more than 50 trips at this intersection. While the incremental impacts of the Plan compared to implementation of the current General Plan would not add 50 or more new trips per to this location, impacts from traffic volume increases at this intersection due to cumulative growth (including the Plan) would be significant.

The nearest CMP mainline freeway-monitoring location is on the I-10 freeway, near Atlantic Boulevard. Traffic volume increases due to cumulative growth (including the Plan) would add more than 150 trips to this location. While the incremental impacts of the Plan compared to implementation of the current General Plan would not add more than 150 new trips per hour to any freeway segment in the vicinity of Alhambra, impacts from traffic volume increases at this location due to cumulative growth (including the Plan) would be significant.

As explained above, Plan impacts to CMP arterial monitoring intersections or mainline freeway-monitoring locations would be significant.

**Mitigation Measures**

As discussed in Impact T-1, there are no feasible mitigation measures at the CMP arterial monitoring intersection of Fremont Avenue and Valley Boulevard, and cumulative impacts would remain significant and unavoidable. As discussed in Impact T-2, freeway mainline impacts would need to be mitigated through implementation of Mitigation Measure T-2, which requires fair-share contributions by future developments permitted by the Plan to freeway corridor improvements planned by Caltrans.
Significance After Mitigation

Although implementation of Mitigation Measure T-2 would reduce Plan impacts to the operation of the mainline of the I-10 freeway corridor, this impact would remain significant and unavoidable. There are no feasible mitigation measures to mitigate the Plan’s significant impacts at the CMP arterial monitoring intersection of Fremont Avenue and Valley Boulevard, and impacts at this location would therefore be significant and unavoidable.

Threshold 3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Impact T-4: Due to the lack of airports in the immediate vicinity of Alhambra, the Plan would not affect air traffic patterns. Impacts would be less than significant.

There are no airports located within the City of Alhambra. The closest airport to the City of Alhambra is the San Gabriel Valley Airport, located approximately four miles to the east. While there are private heliports located in the City (see Impact HAZ-5 in Section 4.6.4 of this EIR), the Plan does not include any policies or call for any development that would increase air traffic levels or otherwise interfere with air traffic, and implementation of the Plan would therefore not interfere with or alter air traffic patterns in or near Alhambra. Therefore, impacts would be less than significant.

Mitigation Measure

This impact would be less than significant. Therefore, mitigation would not be required.

Threshold 4: Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Impact T-5: Due to plan policies to improve safety, and City design standards already in place to ensure safe access and circulation, the Plan would not substantially increase hazards due to a design feature or incompatible use. Impacts would be less than significant.

The does not include any policies or call for any development that would increase hazards due to a design feature or incompatible use. In addition, several policies and development guidelines included in the Plan are aimed at improving safety, through means such as retrofitting streets to better accommodate all users (Policy M-4A) and reducing cut-through traffic in residential neighborhoods (Policy M-1E). Lastly, the City currently has design standards in place in its Municipal Code that all future facilities will be required to meet, including subsection (A)(12) of Section 23.44.030, which states that the design of all projects “shall provide for access and circulation of vehicular, pedestrian, bicycle and emergency vehicle traffic in a safe, logical and efficient manner, both to the site (off-site) and within the site (on-site).” For all these reasons, impacts would be less than significant.

Mitigation Measure

This impact would be less than significant. Therefore, mitigation is not required.
Threshold 5: Would the project result in inadequate emergency access?

Impact T-6: IMPLEMENTATION OF THE PLAN WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS, GIVEN COMPLIANCE WITH APPLICABLE LOCAL AND STATE REQUIREMENTS REGARDING ADEQUATE EMERGENCY ACCESS. IMPACTS WOULD LESS THAN SIGNIFICANT.

The Plan does not include any policies or call for any development that would result in inadequate emergency access. Projects facilitated by the Plan would be required to meet all applicable local and state regulatory standards for adequate emergency access, including the Uniform Building Code (UBC), the California Building Code (CBC), and the Uniform Fire Code. Additionally, projects would be required to comply with applicable Municipal Code and Fire Code requirements regarding emergency access. Any development or improvement facilitated by the Plan will be reviewed by the City Emergency Services Departments (e.g., Police and Fire Departments) to ensure compliance with these requirements and provision of adequate emergency access. Therefore, impacts would be less than significant.

Mitigation Measure

No significant impact has been identified. Therefore, mitigation is not required.

Threshold 6: Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Impact T-7: IMPLEMENTATION OF THE PLAN WOULD GENERALLY ENHANCE THE USE OF ALTERNATIVE TRANSPORTATION MODES, INCLUDING TRANSIT, BICYCLING, AND WALKING. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Mobility chapter of the Plan contains goals and policies that encourage a multi-modal transportation network in the City. Alhambra is currently served by various alternatives to the use of the private automobile. Private-sector transit services such as taxi cab companies and rideshare services provide mobility options to individuals, alleviating the need for them to drive and park their own car. Other forms of alternative transportation, including bicycle and pedestrian circulation and transit, are also found within the City.

Plan Goal M-2 is to create “A circulation system that accommodates and encourages the use of alternative modes of transportation, including walking, bicycling, and transit.” Plan policies to achieve this goal and enhance alternative transportation mode opportunities throughout the City include:

Policy M-2A  Ensure that new development accommodates, and does not have a negative impact on, alternative transportation.

Policy M-2B  Improve transportation infrastructure and services in a way that will increase the utility and attractiveness of alternative modes of transportation.

Policy M-2C  Improve connectivity for alternative transportation modes throughout and beyond the City.

Policy M-2D  Create transit stop amenity and access improvement at key intersections on Atlantic Boulevard and Valley Boulevard. The intersections of Atlantic/Huntington-Garfield, Atlantic/Main, and Atlantic/Valley would be the
first priority, and the intersections of Fremont/Valley and Garfield/Valley would be the second priority.

**Policy M-2E** Investigate and where feasible implement first-mile/last-mile supportive measures to encourage and facilitate the use of transit.

**Policy M-2F** As feasible, implement the improvements to the City’s bike network, as illustrated conceptually in Figure 12. The bikeways system should connect to the regional system and may need to be adjusted over time as conditions change. The bike network will include, as appropriate, enhancements to bicyclist safety and bike parking.

Plan Goal M-4 is street designs that accommodate all users while activating streets along key corridors. Possible redesigns of key nodes/corridors, as described in Policy M-4A and shown in Figure 14 of the Plan, include bulbouts, sidewalk widening, landscaped medians, and the use of sharrows (a street marking in a travel lane to indicate where people should cycle), in order to provide safety for pedestrians using alternative modes of transportation. Under Policy M-4A, the City would also consider the installation of street furniture and increased pedestrian lighting to provide more accommodating, pedestrian-friendly spaces.

As illustrated in Figure 41, the Plan includes a conceptual future bikeway network in the City. This network could include the following Class II bicycle facilities:

- **Huntington Drive.** Class II bicycle lanes would be provided on the City of Alhambra side of this divided roadway, roughly between Maycrest Avenue and Alhambra Road.
- **West Main Street.** Class II bicycle lanes would be provided on this divided roadway, linking to the lanes on Huntington Drive and continuing to Raymond Avenue on the east.
- **Marengo Avenue.** Class II bicycle lanes would be provided within limited segments where geometry permits north of Mission Road and between Valley Boulevard and the I-10 freeway.

No adverse transportation impacts would be caused by implementation of these bicycle facilities.

As demonstrated by the preceding discussion, Plan implementation would generally enhance the use of alternative transportation modes, including transit, bicycling, and walking, and impacts to alternative transportation would be less than significant.

**Mitigation Measures**

No significant impact has been identified. Therefore, mitigation is not required.
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4.13 Utilities and Service Systems

This section evaluates potential Plan impacts to water, wastewater, and solid waste service. Section 4.7, Hydrology and Water Quality, addresses potential impacts to storm drain infrastructure and surface water quality.

4.13.1 Setting

a. Water Supply

The City is a member agency of the San Gabriel Valley Municipal Water District (SGVMWD). The City is a local water purveyor that serves retail customers within its service area. It has the legal right to pump groundwater from the Main San Gabriel Basin and the Raymond Basin to serve over 90,000 customers. About 80 percent of the City’s water comes from nine active wells drawn from the Main San Gabriel Basin. No groundwater is currently pumped from the Raymond Basin due to nitrate levels above maximum contaminant level. While Alhambra is not a member agency of the Upper San Gabriel Valley Municipal Water District (Upper District), it can purchase treated imported water from the Upper District, and does so to obtain the remaining 20% of its supply. The City works cooperatively with its wholesaler and neighboring water supply agencies to promote water efficiency within its service area. On average, groundwater accounts for 74 percent of the City’s supplies and imported water accounts for the other 26 percent (Alhambra 2016a).

Groundwater

Main Basin

Water supply to the Plan Area primarily derives from local groundwater. The City’s distribution system is divided into two major pressure zones: northern and southern. These zones have been established to accommodate the vertical elevation change within the City. Currently, the City pumps groundwater from nine active wells within the Main Basin including wells No. 7, No. 8, No. 9, No. 11, No. 12, No. 13, No. 14, No. 15, Longden 1, and Longden 2. These wells pump groundwater into the southern zone which, upon treatment or blending, is delivered to the City’s customers. In addition, the City owns two inactive wells, wells No. 2 and No. 13.

While there is no limit on the quantity of water that may be extracted by parties to the Main Basin adjudication (more fully described in Section 4.7.1c, Groundwater, of this EIR), including the City, groundwater production in excess of water rights, or the proportional share (pumper’s share) of the Operating Safe Yield (OSY), requires purchase of imported replacement water from the San Gabriel District to recharge the Main Basin. The City of Alhambra has a pumper’s share of 4.45876 percent of the OSY. Typical OSY of the Main Basin is 200,000 acre-feet (AF), providing a pumper’s share for Alhambra of 8,918 acre-feet per year (AFY). For the 2014-2015 fiscal year, following three years of state-wide drought, the OSY was established at 150,000 AF; therefore, the City’s current pumper’s share in the Main Basin is 6,688 AFY (Alhambra 2016a).

Raymond Basin

The City has a legal right to pump from the Raymond Basin, but currently does not operate any active wells within this basin. Under the adjudication of the Raymond Basin, the Court determined who had the right to extract water and the maximum annual amount of water allowed to be
pumped by each producer. The City has a decreed annual pumping right of 1,031 AFY in the Raymond Basin.

**Imported Water**

The City receives direct delivery of imported water from MWD through an agreement called the Cooperative Water Exchange Agreement (CWEA) to reduce the amount of water extracted from the Main Basin. MWD has access to imported water from the Colorado River and the Sacramento-San Joaquin River Delta in Northern California. The CWEA is an agreement between the City, the San Gabriel District, the Upper District, MWD, and the Main San Gabriel Watermaster. The agreement was developed to reduce a localized condition which exists in the westerly portion of the Main Basin, called the Alhambra Pumping Hole (APH). The APH receives little replenishment due to the hydrogeologic characteristics of the basin in that area. Seven producers extract water from the APH, which has resulted in declining water level elevation. To mitigate this condition, it was agreed that Alhambra would receive direct delivery of water from MWD’s USG-5 service connection, which is controlled by the City; and in exchange, the City would reduce its extraction of water from the APH by an equivalent amount. CWEA is cooperatively financed by the City and three of the parties to the agreement, excluding MWD (Alhambra 2016a).

**Distribution**

The City’s distribution system includes six reservoir sites, five booster pump stations, one MWD supply point administered by the Upper District, and an interconnection with the San Gabriel County Water District (SGCWD). The City’s distribution system is divided into two major pressure zones: northern and southern. These zones have been established to accommodate the vertical elevation change within the City. The northern zone is comprised of four different service areas: the Alta Vista Service hilltop area, the Palatine hilltop service area, the Garvey hilltop service area, and the Siwanoy hilltop service area. The northern zone, which serves water to the higher elevations of the City, serves water to the four different areas through separate booster pump stations, drawing water from an associated reservoir. The Alta Vista Service hilltop area is supplied by system water from the northern pressure zone. The Palatine hilltop service area is supplied by the Garvey Reservoir and booster pump station. The Siwanoy hilltop service area is supplied from a closed system by a booster pump station (Alhambra 2016a).

**Groundwater Management**

**Main Basin**

Management of the Main Basin’s water resources is based upon two Watermaster Services: the San Gabriel River Watermaster (River Watermaster) and the Main San Gabriel Basin Watermaster (Basin Watermaster). These watermaster services resulted from two Court Judgements: the Long Beach Judgement and the Main Basin Judgement. The City was a defendant in the Long Beach Judgement and as such has significant participation. In addition, Alhambra was a plaintiff in the court action that resulted in the creation of the Basin Watermaster. Alhambra is also included in the Main Basin Judgement. The two Judgments (Long Beach Judgement and Main Basin Judgement) and the Five Year Water Quality and Supply Plan make up the groundwater management plan for the Main Basin.
Five-Year Water Quality and Supply Plan

Management of the Main Basin is described in the Basin Watermaster document entitled the *Five-Year Water Quality and Supply Plan* (Five-Year Plan). The objective of the Five-Year Plan is to coordinate groundwater-related activities so that both water supply and water quality in the Main Basin are protected and improved. Many important issues are detailed in the Five-Year Plan, including how the Basin Watermaster plans to: 1) monitor groundwater supply and quality; 2) develop projections of future groundwater supply and quality; 3) review and cooperate on cleanup projects, and provide technical assistance to other agencies; 4) assure that pumping does not lead to further degradation of water quality in the Basin; 5) Address Perchlorate, N-nitrosodimethylamine, and other emerging contaminants in the Basin; 6) Develop a cleanup and water supply program consistent with EPA plans for its San Gabriel Basin Superfund sites; and 7) Coordinate and manage the design, permitting, construction, and performance evaluation of the Baldwin Park Operable Unit cleanup and water supply plan.

The Area 3 Operable Unit is located in the westerly portion of the Main Basin. It is generally bounded on the south by the I-10 Freeway, on the east by Rosemead Boulevard, on the north by Huntington Drive, and on the west by the boundary of the Main Basin. EPA has installed a series of monitoring wells to collect water quality data to supplement data collected from water supply wells, and has initiated a Remedial Investigation and Feasibility Study to identify the extent of the contamination and to evaluate appropriate cleanup remedies. Section 28 of the Basin Watermaster's Rules and Regulations require all producers (including the City) to submit an application to 1) construct a new well, 2) modify an existing well, 3) destroy a well, or 4) construct a treatment facility. In 2006, the Basin Watermaster issued a permit to the City to construct a treatment facility to remove VOCs from wells No. 7, 8, 11, and 12. The treatment facility became operational in April 2009, prior to EPA's development of a final remedy, but is necessary for Alhambra to receive a reliable source of supply from the groundwater basin. The facility has treated about 22,300 AF and has removed about 700 pounds of contaminants (Alhambra 2016a).

The Basin Watermaster prepares a report on the implications of proposed activity in the Operable Units. As a part to the Main Basin Judgement, Alhambra reviews a copy of these reports and is provided the opportunity to submit comments on the proposed activity before the Basin Watermaster Board takes final action. The Basin Watermaster continues to administer and monitor the quality and supply capacity of the Basin to ensure that the water supply needs of the region are met. The Basin Watermaster continues to work with affected Producers, Responsible Parties, and others to achieve these goals (Alhambra 2016a).

Raymond Basin

The City historically has pumped groundwater from the Pasadena Subarea of the Raymond Basin. The City owns a well – Well No. 2 – in the Raymond Basin that is currently out of service. Management of the water resources of the Raymond Basin is based on the Raymond Basin Judgment. The City is a defendant in the Raymond Basin Judgment and thus has active participation. According to the Raymond Basin Judgement, the City can produce up to 1,031 acre-feet per year from the Raymond Basin. Although the City has not pumped from the Raymond Basin in several years, it has plans to develop a blending plant for its Well No. 2 to restore use of its water rights in the Raymond Basin.
The Raymond Basin Management Board approved new well construction and destruction guidelines. These guidelines are a tool to be used in tracking wells and providing a technical basis for better management of groundwater extractions and contamination control.

Both groundwater basins (Main Basin and Raymond Basin) utilized by the City have been adjudicated and are well-managed. In addition, DWR Bulletin 118 does not identify the Main Basin or the Raymond Basin as being in overdraft (Alhambra 2016a).

**Groundwater Replenishment**

The San Gabriel District, along with the Upper District, in cooperation with the Basin Watermaster, proposed to implement a water recycling/groundwater recharge program referred to as the San Gabriel Valley Recycled Water Demonstration Project. This project proposes to recharge the Main Basin using up to 10,000 AFY of tertiary treated recycled water. The source of the recycled water will be the San Jose Creek Water Reclamation Plant (SJCWRP) and the point of recharge will be the San Gabriel River. Although the maximum amount of recycled water that would be recharged into the San Gabriel River in any year would be 10,000 AF, in some years this amount is anticipated to be less due to Key Well limitations on groundwater recharge and other constraints. Recycled water recharge over the long term is anticipated to average about 8,000 AFY. The design portion of this project has been completed; however, a study of the project's potential is still underway (Alhambra 2016a).

**Recycled Water**

The infrastructure necessary to utilize recycled water is currently unavailable in Alhambra, although there may be future opportunities to incorporate recycled water into landscape irrigation. As a member of the MWD, the City is a participant in discussions regarding the possibility of utilizing recycled water for Basin recharge (Alhambra 2015a).

**Water Conservation**

The City participates in the promotion of water conservation programs developed and implemented by the San Gabriel District, a regional agency of which the City is a member. Water Conservation programs offered by the San Gabriel District are available to residents of the City, as described below.

**Demand Management Measure (DMM) No. 1: Water Waste Prohibition Ordinances**

The City of Alhambra has various water waste prohibition and guidelines incorporated in its Urban Water Shortage Contingency Plan (Plan). The Plan gives the City authority to declare water shortage conditions and implement stages of action to reduce water demands. It defines terms used in the plan and implementation procedures pursuant to the requirements of the California Water Code (CWC). The Plan gives Water Division staff the authority to monitor and evaluate the projected supply, as well as demand for water by its customers. In the event of a water shortage, and depending on the severity of the water shortage conditions, staff make recommendations to the City Council for water use reduction. At any time during the water shortage period, the City Council may implement another plan. As of June 22, 2015, the City implemented the Water Shortage Plan III (Resolution No. R2M15-12), which includes additional water conservation measures such as

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restricting landscape watering day, or allowing refill of a swimming pool until after the commencement of a water shortage period.

**DMM No. 2: Metering**

The City of Alhambra has a complete metered system for all customer sectors. The City has separate meters for each unit of multi-family residential, commercial and all institutional/governmental facilities. If there is new development or redevelopment in the City, each unit is individually metered. For the City’s metered distribution system, commodity rates exist for all new and existing connections. According to Alhambra Municipal Code 15.12.010, all City water used on any premises where a meter is installed must pass through the meter, except as provided in the case of private fire services. No bypass or connection around the meter between the services and the main shall be made or maintained. Customers will be held responsible and charged for all water passing through their meters. The City has not estimated the water savings under this DMM.

**DMM No. 3: Conservation Pricing**

The City has basic system operation fees that vary with the size of the connection. The City also has a water usage charge that increases with each increase in water use. Those customers that use between 0 and 12 cubic feet (CCF) pay less per billing unit than a customer that uses between 13 and 20 CCF or more. This tiered water rates structure effectively promotes water conservation by providing financial incentives to its customers through the City’s rate schedule. This program promotes water conservation because the City’s customers are rewarded based on their personal practices. Those customers that conserve water will save money.

**DMM No. 4: Public Education and Outreach**

The City’s Public Works Departments is dedicated to educating the public about water conservation, water awareness, and regulatory mandates. The City has been constantly reaching its customers about these issues through insertions in bi-monthly water bills, notices in the local newspaper, social media, and the City’s website. The Public Works Department is also using construction message boards on City streets to notify drivers and notices are also available at City Hall. Finally, staff will also be required to provide a monthly report to the Water Resources Board and per capita water usage information.

**DMM No. 5: Programs to Assess and Manage Distribution System Real Loss**

The City of Alhambra repairs leaks within its distribution system on an as-needed basis. The City closely monitors its water production and consumption use tabulating the amount of "unaccounted for water". The City's current estimated "unaccounted for water" is approximately 6 percent. If the City notices an increase in "unaccounted for water" that is not attributed to normal water loss, the City will investigate the cause and repair a leak if necessary. Normal water loss can result from the installation of new water mains, difference in accuracy of meters, water facilities or water connections, street cleaning, and Fire Department training. If water loss is not a result of normal water loss activities, the City can assume there is a faulty meter or a leak in the distribution system, identify the cause, and make the repairs.

**DMM No. 6: Water Conservation Program Coordination and Staffing Support**

In 2011, the Utilities Department funded a Conservation Specialist staff position. This staff member is responsible for all aspects of public education, conservation policies, research, and training.
related to water and energy conservation. In addition, the Customer Service Manager and Customer Service Division staff is responsible for the monitoring of conservation measures, as they oversee the metering and billing aspects of the utility.

**DMM NO. 7: OTHER DEMAND MANAGEMENT MEASURES**

The City also has additional DMM’s such as a rain barrel and cisterns program, turf replacement program, high-efficiency toilet program, and residential plumbing retrofit (Alhambra Draft 2015 UWMP).

**Future Water Supply**

Wells 8 and 12 were previously non-operational due to VOCs/nitrates in excess of drinking water standards, but after construction of a treatment facility to remove VOCs and reduce nitrate concentrations from wells 7, 8, 11, and 12, wells 8 and 12 are now operational. The treatment facility uses liquid-phase granular activated carbon (LGAC) to remove VOCs and ion exchange technology to reduce nitrate concentrations. This project has enable Wells 8 and 12, with a combined capacity of 2,500 gpm, to return to active service. Assuming the wells are operated 50 percent of the year, this capacity provides about 2,016 AFY to meet current/future demands.

The City is evaluating the economics of developing a blending plant to optimize the use of its Raymond Basin water rights. Currently, the City’s Well No. 2, located in Raymond Basin is inoperable due to a high level of nitrates. The development of a blending plant will allow the City to optimize its water rights within the Raymond Basin instead of pumping from the Main Basin only. It is anticipated a blending plant will enable the City to produce about 500 AFY from its Well 2. This will provide the City with operational flexibility and offset 500 AFY of over-production from the Main Basin. This will allow the City to avoid a Replacement Water assessment, resulting in potential cost savings, and will reduce the need to deliver 500 AFY of supplemental imported water from the State Water Project. The City has not yet developed a timeline for this project, but is in the process of evaluating a blending plant as a future water supply project (Alhambra 2016a).

**Water Supply Projections**

Future water supplies are projected in the Alhambra Draft UWMP. All projected water demands will be sourced from potable and raw water, not recycled water. The projected demand in five-year increments through 2040 is shown in Table 41 and the projected production by source water type is shown in Table 42. The information in Table 42 is based strictly on the state’s SBx7-7 “20 by 2020” water use reduction goals and the City’s target goal of 131 gallons-per-capita-per-day (GPCD). As the hydrologic cycles of California move in and out of drought conditions, Alhambra’s anticipated water needs can be identified as a range for future planning. Table 41 and Table 42 include the future water savings as defined by SBx7-7 (2009 Water Conservation Act) and lower-income residential water demands (Alhambra 2016).

**b. Wastewater**

The Plan Area is located within the jurisdictional boundaries of Los Angeles County Sanitation Districts (LACSD) Districts 2 and 16. All wastewater is treated off-site at three regional treatment plants. No wastewater is treated or disposed of within the City boundaries. The City operates a wastewater collection system for its water customers. The Sewer and Storm Drain Section of the Utilities Division maintains and operates the sewer collection system including storm drains, catch
basins, and sewer lines (Alhambra 2015a). All wastewater collected through the City sewer system is conveyed to the LACSD, where it is transferred to one of three reclamation plants (LACSD 2017d).

**Table 41  Demands for Potable and Raw Water – Projected (AF)**

<table>
<thead>
<tr>
<th>Use Type</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
<th>2035</th>
<th>2040</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single Family (single- and multi-family dwellings)</td>
<td>9,278</td>
<td>9,537</td>
<td>9,796</td>
<td>10,055</td>
<td>10,314</td>
</tr>
<tr>
<td>Commercial (includes industrial uses)</td>
<td>2,129</td>
<td>2,189</td>
<td>2,248</td>
<td>2,308</td>
<td>2,367</td>
</tr>
<tr>
<td>Institutional/Gov't</td>
<td>776</td>
<td>797</td>
<td>819</td>
<td>841</td>
<td>862</td>
</tr>
<tr>
<td>Other</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Losses (projected to remain at 6%)</td>
<td>729</td>
<td>749</td>
<td>770</td>
<td>790</td>
<td>810</td>
</tr>
<tr>
<td>Total</td>
<td>12,913</td>
<td>13,273</td>
<td>13,634</td>
<td>13,995</td>
<td>14,354</td>
</tr>
</tbody>
</table>

AF = Acre-Feet  
Source: City of Alhambra 2016a

**Table 42  Current and Projected Water Supplies (AF)**

<table>
<thead>
<tr>
<th>Year</th>
<th>2015</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
<th>2035</th>
<th>2040</th>
</tr>
</thead>
<tbody>
<tr>
<td>Groundwater</td>
<td>7,260</td>
<td>9,913</td>
<td>10,273</td>
<td>10,634</td>
<td>10,995</td>
<td>11,354</td>
</tr>
<tr>
<td>Purchased/Import</td>
<td>2,712</td>
<td>3,000</td>
<td>3,000</td>
<td>3,000</td>
<td>3,000</td>
<td>3,000</td>
</tr>
<tr>
<td>Total Water Supply</td>
<td>9,972</td>
<td>12,913</td>
<td>13,273</td>
<td>13,634</td>
<td>13,995</td>
<td>14,354</td>
</tr>
</tbody>
</table>

AF = Acre-Feet  
Source: City of Alhambra 2016a

The Joint Water Pollution Control Plant (JWPCP), Whittier Narrows Water Reclamation Plant (WNWRP), and the Los Coyotes Water Reclamation Plant (LCWRP) treat approximately 253.4 mgd, 7.3 mgd, and 20.4 mgd, of wastewater, respectively. LACSD District 16 operates all three reclamation plants. The method of disposal when treated recycled water is not used is via the San Gabriel/Rio Hondo Wash and ocean outfall (Alhambra 2016a, LACSD 2017d).

The JWPCP has a treatment capacity of 400 mgd. The facility provides both primary and secondary treatment, serving a population of approximately 3.5 million people throughout Los Angeles County. Prior to discharge, the treated wastewater is disinfected with sodium hypochlorite and sent to the Pacific Ocean through a network of outfalls (LACSD 2017b).

The WNWRP has a treatment capacity of about 15 mgd. The WNWRP provides coagulated, filtered, and disinfected tertiary effluent. All wastewater treated at the WNWRP meets recycled water standards. The WNWRP serves a population of approximately 150,000 people. During fiscal year
2013-14, the total recycled water production from this plant was about 9,639 AF (Alhambra 2015a, LACSD 2017).

The LCWRP has a treatment capacity of 37.5 mgd. LCWRP provides primary, secondary, and tertiary treatment, and serves a population of approximately 370,000 people. Over five million gallons per day of recycled water from this facility is used at over 270 sites, including landscape irrigation of schools, golf courses, parks, nurseries, greenbelts, and industrial uses. The remainder of the recycled water is discharged to the San Gabriel River (LACSD 2017b).

Current studies are underway that are evaluating the use of advanced treatment for indirect (groundwater replenishment) and direct use that will provide additional water supply for the San Gabriel District and its member agencies, including Alhambra. The Indirect Reuse Replenishment Project could provide the Upper District with up to 10,000 AF per year of basin replacement water on behalf of its contract agencies, including Alhambra, which could ease the region’s reliance on imported water by 25 percent, according to a draft study dated February 2016. A joint recycled water master plan was prepared for the San Gabriel District in 2008 and determined direct use opportunities for each of the San Gabriel District’s member agencies. The master plan identified direct use opportunities for Alhambra of up to 1,500 AFY. Alhambra’s 2015 Draft UWMP Plan states that, although the City actively supports the Indirect Reuse Replenishment Project, it does not have plans to receive recycled water for direct use (Alhambra 2016a).

c. Solid Waste

The City contracts with Republic Services to provide complete residential and commercial trash, solid waste, and recycling services, including residential curbside trash, recycling and yard waste collection, pick up of bulky items, and electronic waste pickup, for all single and multi-family homes (Alhambra 2017b). Under the ownership of Republic Services, Allied Waste Services provides residential service and Consolidated Disposal provides commercial service to Alhambra (Aurora Environmental 2017).

Like all municipalities, Alhambra must meet the solid waste diversion mandates established by the California Integrated Waste Management Board under State Assembly Bill 939 (AB 939) in 1989. AB 939 mandates that all cities reduce annual waste per capita by 50 percent, a goal which Alhambra has achieved on a consistent basis (Alhambra 2015a). Alhambra complies with all state recycling requirements, including legislation that imposes Mandatory Commercial Recycling on all businesses that generate at least four cubic yards of trash per week, and also on all multi-family dwelling that have 5 units or more. The City’s waste haulers send both residential and commercial solid waste to Materials Recovery Facilities (MRFs) where recyclable items are pulled out of the waste stream and recycled. These facilities are very effective at extracting valuable recycling items from the waste stream. Sending solid waste to MRFs has helped increase the City’s diversion rate over what is achieved through the curbside recycling program.

In October 2014 Governor Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units (although multifamily dwellings are not required to have a food waste diversion program). Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. This law phases in the mandatory recycling of commercial organics over time, while also offering an exemption process for rural counties. In particular, the minimum
threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply (CalRecycle, 2017b).

According to CalRecycle’s Disposal Reporting System (DRS), in the fourth quarter of 2016, solid waste generated in Alhambra is disposed of at fourteen different landfills, recycling centers, and waste recovery and conversion facilities, as summarized below. The City’s landfill capacity is shown in Table 43.

Table 43 City Service Landfill Capacity

<table>
<thead>
<tr>
<th>Site</th>
<th>Maximum Permitted Throughput per Day</th>
<th>Maximum Permitted Capacity</th>
<th>Remaining Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>CY 1</td>
<td>Tons</td>
<td>CY 3</td>
</tr>
<tr>
<td>Azusa Land Reclamation Co. Landfill</td>
<td>10,000</td>
<td>8,000</td>
<td>80,571,760</td>
</tr>
<tr>
<td>Lancaster Landfill and Recycling Center</td>
<td>6,375</td>
<td>5,100</td>
<td>27,700,000</td>
</tr>
<tr>
<td>Chiquita Canyon Sanitary Landfill</td>
<td>7,500</td>
<td>6,000</td>
<td>63,900,000</td>
</tr>
<tr>
<td>Commerce Refuse-To-Energy Facility</td>
<td>1,250</td>
<td>1,000</td>
<td>1,250</td>
</tr>
<tr>
<td>Sunshine Canyon City/County Landfill</td>
<td>15,125</td>
<td>12,100</td>
<td>140,900,000</td>
</tr>
<tr>
<td>Antelope Valley Public Landfill</td>
<td>4,455</td>
<td>3,564</td>
<td>0</td>
</tr>
<tr>
<td>Savage Canyon Landfill</td>
<td>4,188</td>
<td>3,350</td>
<td>19,337,450</td>
</tr>
<tr>
<td>Southeast Resource Recovery Facility</td>
<td>2,800</td>
<td>2,240</td>
<td>2,240</td>
</tr>
<tr>
<td>Prima Deshecha Sanitary Landfill</td>
<td>5,000</td>
<td>4,000</td>
<td>172,900,000</td>
</tr>
<tr>
<td>Olinda Alpha Sanitary Landfill</td>
<td>10,000</td>
<td>8,000</td>
<td>148,800,000</td>
</tr>
<tr>
<td>Frank R. Bowerman Sanitary Landfill</td>
<td>14,375</td>
<td>11,500</td>
<td>266,000,000</td>
</tr>
<tr>
<td>El Sobra Landfill</td>
<td>20,068</td>
<td>16,054</td>
<td>184,930,000</td>
</tr>
<tr>
<td>Mid-Valley Sanitary Landfill</td>
<td>9,375</td>
<td>7,500</td>
<td>101,300,000</td>
</tr>
<tr>
<td>Simi Valley Landfill &amp; Recycling Center</td>
<td>11,563</td>
<td>9,250</td>
<td>119,600,000</td>
</tr>
<tr>
<td>Total</td>
<td>122,073</td>
<td>97,658</td>
<td>1,325,942,700</td>
</tr>
</tbody>
</table>

1 List of solid waste disposal sites for Alhambra varies by quarter (Aurora Environmental, Inc. 2017). The list used in this table is from the 4th quarter of 2016. Source: CalRecycle, Disposal Reporting System, 2016.
3 CalRecycle (2017a) identifies Maximum Permitted Throughput only in Tons/Day, while Maximum Permitted Capacity and Remaining Capacity are only provided in Cubic Yards; therefore, standard conversion factors provided by the EPA (EPA 2016) are used to provide all figures in both Tons and Cubic Yards. EPA identifies a standard conversion factor for Municipal Solid Waste (MSW) compacted to “Landfill Density” of 1,700 pounds per cubic yard, equating to approximately 0.8 ton per cubic yard of compacted MSW. Source: EPA (U.S. Environmental Protection Agency) 2015, Standard Volume-to-Weight Conversion Factors, https://www.epa.gov/sites/production/files/2016-04/documents/volume_to_weight_conversion_factors_memorandum_04192016_508final.pdf, Accessed July 7, 2017.
- **Azusa Land Reclamation Co. Landfill** is located at 1211 West Gladstone Street in Azusa. This 302-acre landfill is a Class II and III landfill facility owned and operated by Azusa Land Reclamation Co. Inc. It accepts the following types of waste: asbestos, friable, contaminated soil, inert, and tires.

- **Lancaster Landfill and Recycling Center** is located at 600 East Avenue ‘F’ in Lancaster. This 276-acre landfill is a Class III facility owned and operated by Waste Management of California, Inc. It accepts the following types of waste: agricultural, construction/demolition, industrial, mixed municipal, tires, inert, green materials, asbestos, sludge (biosolids), and contaminated soil. This landfill has a permitted design capacity of 27,700,000 cubic yards, with a remaining capacity of 14,514,648 million tons as of August 2012. The landfill has a permitted maximum daily tonnage of 5,100 tons per day. Based on the current average daily disposal rate and a six-day operating week, it is projected to close in about 27 years (by about 2044).

- **Chiquita Canyon Sanitary Landfill** is located at 29201 Henry Mayo Drive in Castaic. The 592-acre landfill is a Class III facility owned and operated by Chiquita Canyon, Inc. This landfill accepts the following types of waste: mixed municipal, green materials, construction/demolition, industrial, and inert. The Chiquita Canyon Sanitary Landfill has a permitted design capacity of 63,900,000 cubic yards with a remaining capacity of 6,893,701 million tons as of April 2016. The landfill has a permitted maximum daily tonnage of 6,000 tons per day. Based on the current average daily disposal rate, the landfill is projected to close in about 2 years (by about 2019).

- **Commerce Refuse-To-Energy Facility** is located at 5926 Sheila Street in Commerce. This 5.7-acre volume transformation facility is owned by Commerce Refuse-To-Energy Authority and operated by the County of Los Angeles Sanitation District. This waste-to-energy facility accepts only non-hazardous, burnable, municipal solid waste. It is a 350 ton per day waste-to-energy facility, with a permitted maximum daily tonnage of 1,000 tons per day, which converts residential and commercial refuse into enough power for 20,000 homes. The facility provides refuse disposal and certified destruction services for individuals, businesses, haulers, and municipalities (LACSD 2017a). A closure date is not available from CalRecycle.

- **Sunshine Canyon Landfill** is located at 14747 San Fernando Road in Granada Hills. This 1,036-acre landfill is a Class III facility owned and operated by Browning-Ferris Ind. It accepts the following types of waste: construction/demolition, green materials, industrial, inert, and mixed municipal. The Sunshine Canyon Landfill has a permitted design capacity of 140,900,000 cubic yards, with a remaining capacity of 96,800,000 million tons, as of October 2012 (CalRecycle 2017a). An average of 8,300 tons of waste is landfilled daily, with a permitted maximum daily tonnage of 12,100 tons per day (Sunshine Canyon Landfill 2017). Based on the current average daily disposal rate and a six-day operating week, the landfill is projected to close in about 20 years (by about 2037).

- **Antelope Valley Public Landfill** is located at 1200 W. City Ranch Road in Palmdale. This 185-acre landfill is owned and operated by Antelope Valley Recycling and Disposal. It accepts the following types of waste: agricultural, asbestos, construction/demolition, contaminated soil, green materials, industrial, inert, and mixed municipal. CalRecycle does not report cubic yards of maximum permitted capacity for this landfill. The landfill has a remaining capacity of 14,642,618 million tons as of April 2016. The landfill has a permitted maximum daily tonnage of 3,564 tons per day. Based on the current average daily disposal rate and a six-day operating week, the landfill is projected to close in about 25 years (by about 2042).
- **Savage Canyon Landfill** is located at 13919 East Penn Street in Whittier. This 132-acre landfill is a Class III facility owned and operated by the City of Whittier. It accepts the following types of waste: mixed municipal, construction/demolition, industrial, green materials, and inert. The Savage Canyon Landfill has a permitted design capacity of 19,337,450 cubic yards, with a remaining capacity of 7,608,666 million tons, as of December 2011. The landfill has a permitted maximum daily tonnage of 3,350 tons per day. Based on the current average daily disposal rate and a six-day operating week, the landfill is projected to close in about 38 years (by about 2055).

- **Southeast Resource Recovery Facility (SERRF)** is located at 118 Pier S. Avenue in Long Beach. This 15-acre waste-to-energy and recycling facility is owned by SERRF, Joint Powers Authority and operated by the City of Long Beach (LACSD 2017e). It accepts the following types of waste: other hazardous, mixed waste, and green materials. The SERRF has a permitted design capacity of 2,800 cubic yards. While this facility has a permitted maximum daily tonnage of 2,240 tons per day, Cal Recycle does not report remaining capacity or a projected closure date for this facility because it is a waste-to-energy and recycling facility, not a landfill.

- **Prima Deshecha Sanitary Landfill** is located at 32250 La Pata Avenue in San Juan Capistrano. This 1,530-acre landfill is a Class III facility owned and operated by OC Waste and Recycling. It accepts the following types of waste: construction/demolition, mixed municipal, and industrial. The Prima Deshecha Sanitary Landfill has a permitted design capacity of 172,900,000 cubic yards, with a remaining capacity of 69,907,839 million tons, as of August 2005. An average of 1,400 tons of waste is landfilled daily, with a permitted maximum daily tonnage of 4,000 tons per day (County of Orange 2017). Based on the current average daily disposal rate and a six-day operating week, the landfill is projected to close in about 50 years (by about 2067).

- **Olinda Alpha Sanitary Landfill** is located at 1942 N. Valencia Avenue in Brea. This 565-acre landfill is a Class III facility owned and operated by OC Waste and Recycling. It accepts municipal solid waste, including agricultural, industrial, construction/demolition, mixed municipal, and wood waste from commercial haulers. This landfill has a permitted design capacity of 148,800,000 cubic yards, with a remaining capacity of 27,360,000 million tons, as of November 2014. It has a permitted maximum daily tonnage of 8,000 tons per day. Based on the current average daily disposal rate and a six-day operating week, this landfill is projected to close in about 4 years (by about 2021).

- **Frank R. Bowerman Sanitary Landfill** is located at 11002 Bee Canyon Access Road in Irvine. The 725-acre landfill is a Class III facility owned and operated by OC Waste and Recycling. It accepts the following types of waste: mixed municipal, industrial, and construction/demolition. This landfill has a permitted design capacity of 266,000,000 cubic yards, with a remaining capacity of 164,000,000 million tons, as of February 2008. It has a permitted maximum daily tonnage of 11,500 tons per day. Based on the current average daily disposal rate and a six-day operating week, this landfill is projected to close in about 36 years (by about 2053).

- **El Sobrante Landfill** is located at 10910 Dawson Canyon Road in Corona. This 485-acre landfill is a Class III facility owned and operated by USA Waste Services of California, Inc. It accepts the following types of waste: mixed municipal, construction/demolition, non-hazardous soil, treated wood waste, and yard waste. This landfill has a permitted design capacity of 184,930,000 cubic yards, with a remaining capacity of 116,424,000 million tons, as of April 2009. It has a permitted maximum daily tonnage of 16,054 tons per day. Based
on the current average daily disposal rate and a six-day operating week, this landfill is projected to close in about 28 years (by about 2045).

- **Mid-Valley Sanitary Landfill** is located at 2390 N. Alder Avenue in Rialto. This 498-acre landfill is a Class III facility owned and operated by the County of San Bernardino Solid Waste Management Division. It accepts the following types of waste: mixed municipal, construction/demolition, industrial, and tire waste. This landfill has a permitted design capacity of 101,300,000 cubic yards, with a remaining capacity of 54,016,000 tons per day (website 2017). Based on the current average daily disposal rate and a six-day operating week, this landfill is projected to close in about 16 years (by about 2033).

- **Simi Valley Landfill and Recycling Center** is located at 2801 Madera Road in Simi Valley. This 887-acre landfill is a Class III facility owned and operated by Waste Management of California. It accepts the following types of waste: construction/demolition, industrial, mixed municipal, and sludge (biosolids). It has a permitted design capacity of 119,600,000 cubic yards, with a remaining capacity of 95,680,000 million tons, as of April 2012. An average of 3,000 tons of waste is landfilled daily, with a permitted maximum daily tonnage of 9,250 tons per day (Tignac 2017). Based on the current average daily disposal rate, a five-day operating week (also open the third Sunday of each month), this landfill is projected to close in about 35 years (by about 2052) (CalRecycle 2017a).

Recyclables are collected in separate containers in Alhambra, at single family residences, some multi-family residences, businesses and agencies. The City’s two waste haulers, Allied Waste Services and Consolidated Disposal, achieve most of their waste diversion through mixed waste processing at MRFs In accordance with AB 939, recyclables are sorted, and the residual waste is transferred to the landfill. Per CalRecycle’s Disposal Reporting System, in 2016, the City of Alhambra disposed of 40,858 tons of waste. The City’s 2016 diversion rate of 65 percent would result in approximately 14,301 total gross tons of residual waste. In 2016, the City’s contract hauler collected 1.40 tons of waste per single family household (Aurora Environmental 2017).

In 2016, the City’s residential and commercial contract haulers delivered recyclables and mixed waste for processing (i.e., recyclables recovery) at the following facilities: Allied/BFI Waste Systems Falcon, American Waste Transfer Station, Bel-Art Waste Transfer Station, Burbank Recycle Center, City Fibers, City Terrace Recycling Transfer Station, CVT Regional Material Recovery and Transfer Station, Direct Disposal, East Los Angeles Recycling & Transfer Station, East Valley Diversion, Innovative Waste Control, Recology Los Angeles Transfer Station, Sun Valley Paper Stock MRF and Transfer Station, and Waste Transfer & Recycling (Aurora Environmental 2017b). Republic Services processes an average of 4,800 tons of material daily using automated and manual sorting systems (Alhambra 2017b).

Alhambra has achieved a 65 percent diversion rate, which exceeds the 50 percent diversion rate established by the State. In order to achieve this diversion rate, the City and the City’s residential and commercial contract haulers divert waste through source reduction, source separated recycling, mixed waste processing, green and wood waste chipping and grinding, composting, and waste-to-energy (Aurora Environmental 2017).
d. Regulatory Setting

Water Supply

State

Drinking water quality in the Plan Area is regulated by the California Department of Public Health (CDPH), the State Water Resources Control Board (SWRCB), and the Los Angeles Regional Water Quality Control Board (LARWQCB), Region 4 (CalEPA 2017). The California Code of Regulations, Title 22 (State Drinking Water Standards) is the primary body of State legislation providing water system standards, including those for water supply, storage capacity, and water quality. Other applicable regulations and policies include the Porter-Cologne Water Quality Control Act, the Safe Drinking Water Act, and the SWRCB Non-degradation Policy.

The Urban Water Management Planning Act of 1983 amended California Water Code to require all urban water suppliers in California to prepare and adopt an Urban Water Management Plan (UWMP) and update it every five years. This requirement applies to all suppliers providing water to more than 3,000 customers or supplying more than 3,000 acre-feet per year (AFY) of water. The City of Alhambra distributes water to approximately 18,558 customers. A Draft UWMP was prepared for the City in 2015. Water demand projections described in the Draft UWMP account for anticipated future water demands in the city of Alhambra, and changes in land uses including but not limited to densification and associated increases in water usage.

Senate Bill (SB) 610 (2002) amended California Water Code to require detailed analysis of water supply availability for certain types of development projects. The primary purpose of SB 610 is to improve the linkage between water and land use planning by ensuring greater communication between water providers and local planning agencies, and ensuring that land use decisions for certain types of development projects are fully informed as to whether sufficient water supplies are available to meet project demands. SB 610 requires the preparation of a Water Supply Assessment (WSA) for a project that is subject to CEQA and meets certain requirements, including residential developments of more than 500 dwelling units. It is expected that a number of future projects in the Plan Area will meet the threshold requirements for preparation of a WSA, and project-specific WSAs will be prepared by individual project proponents. The Plan itself does not propose construction of individual projects, as residential and non-residential build-out projections are based on development assumptions contained in the Plan. The City of Alhambra’s Draft UWMP provides water supply availability and reliability projections based on population growth estimates over the planning period of the Draft UWMP (2015-2040), with an annual growth rate of approximately 0.57 to 2.6 percent over that time period. Population growth estimates show an increase of 11,789 persons in the City’s service area population during the planning period of the Draft UWMP, from 86,036 to 97,825 persons.

The 2015 Draft UWMP is an update to the City of Alhambra’s previous UWMP, dated June 2011, which was prepared according to the UWMP Act, California Water Code Division 6, Part 2.6. The UWMP serves as a long-range planning document for the City of Alhambra service area and it contains the same types of water supply and demand projections that would be included in a WSA, and this document is therefore an appropriate resource to use in developing the impact analysis provided below. As described in Section 1, *Introduction*, this is a Program EIR, which will be used in the future for tiering of project-level environmental review and CEQA documents; where appropriate, project-specific analyses will be accompanied by a WSA in accordance with SB 610, and may tier off the analysis provided in this Program EIR.
As described under Section 4.13.1, Setting, the City is a member agency of the San Gabriel Valley Municipal Water District (SGVMWD). The City is a local water purveyor that serves retail customers within its service area. The City’s Public Works Department manages the City’s Utilities Division, which is responsible for providing the community with a dependable source of clean drinking water and efficient disposal of sewage and stormwater by means of a well-maintained infrastructure, high-trained and professional personnel, and state-of-the-art equipment. It also educates the public about water conservation, water awareness, and regulatory mandates (Alhambra 2017c). Water supply is provided by active groundwater wells located in the Main Basin, and imported water from MWD through an agreement with the Upper District (Alhambra 2016a). The infrastructure necessary to utilize recycled water is currently unavailable in Alhambra, although there may be future opportunities to incorporate recycled water into landscape irrigation. As a member of the SGVMWD, the City is a participant in discussions regarding the possibility of utilizing recycled water for Basin recharge (Alhambra 2015a). The City of Alhambra operates under the City of Alhambra UWMP, which calculates water supply demand in its service area through the year 2040, along with water supply availability and the reliability of existing and potential water sources through the year 2040 (Alhambra 2016a). The Plan Area is located in the area assessed in the Alhambra UWMP and, therefore, the Alhambra Draft UWMP was used to analyze potential water supply effects associated with the potential full buildout of development under the Plan.

**Water Conservation Act of 2009 (SBx7-7)**

Due to reductions of water available from the San Joaquin Delta, the Legislature drafted the Water Conservation Act of 2009 (SBx7-7) to protect statewide water sources. The legislation called for a 20 percent reduction in water use in California by the year 2020. The legislation amended the Water Code to call for 2020 and 2015 water use targets in the 2010 UWMPs, updates or revisions to these targets in the 2015 UWMPs, and allows DWR to enforce compliance to the new water use standards. Beginning in 2016, failure to comply with interim and final targets will make the City ineligible for grants and loans from the State. In addition to an overall statewide 20 percent water use reduction, the objective of SBx7-7 is to reduce water use within each hydrologic region in accordance with the agricultural and urban water needs of each region. Currently, DWR recognizes 10 separate hydrologic regions. Each hydrologic region has been established for planning purposes and corresponds to the State’s major drainage areas. The City of Alhambra is located in the South Coast Hydrologic Region, which includes all of Orange County; most of San Diego County and Los Angeles County; parts of Riverside, San Bernardino, and Ventura counties; and a small amount of Kern and Santa Barbara counties. The DWR established a regional target of 149 GPCD for the region as a compliance target to satisfy SBx7-7 legislation. An analysis of historical production in recent years shows that the City’s water demand for the last five years (2011 - 2015) was relatively stable even though the City population grew by approximately three percent. This can be attributed to the Water Conservation Act of 2009 and the Governor’s 2014 and 2015 proclamations to further reduce water use (Alhambra 2015 Draft UWMP).

**Model Water Efficient Landscape Ordinance (Assembly Bill 1881)**

The updated Model Water Efficient Landscape Ordinance required cities and counties to adopt landscape water conservation ordinances by January 31, 2010 or to adopt a different ordinance that is at least as effective in conserving water as the updated Model Water Efficient Landscape Ordinance (WELO). In November 2009, the City adopted a WELO (Ordinance 4552, City of Alhambra Municipal Code Chapter 15.26, Water Efficient Landscapes) to reduce the amount of water used in landscaping. This ordinance brings the City into compliance with California Assembly Bill 1881. In
January 2010, the City developed *Guidelines for Implementation of the City of Alhambra Water Efficient Landscape Ordinance* to provide procedural and design guidance for applicants proposing new landscaping or landscape rehabilitation projects that are subject to Chapter 23.48 of the City of Alhambra Municipal Code. These guidelines are also intended for use and reference by City staff in reviewing and approving designs and verifying compliance with the Chapter 15.26 (Alhambra 2010). In January 2016, Alhambra passed Ordinance 4682, Chapter 23.48, *Landscaping Standards*, superseding Chapter 15.26, *Water Efficient Landscapes*. In July 2015, the SWRCB issued a new Model Ordinance to address landscaping (Alhambra 2015a).

Executive Order B-29-15 required the State to revise the Model WELO to increase water efficiency standards for new and retrofitted landscapes through more efficient irrigation systems, greywater usage, on-site stormwater capture, and by limiting the portion of landscapes that can be covered in turf. It also requires reporting on the implementation and enforcement of local ordinances, with required reports due by December 31, 2015 (California Department of Water Resources [DWR] 2017).

**Regional and Local**

The main sources of water supply for the Plan Area would be groundwater produced from the Main Basin and purchased water. The City has a legal right to pump from the Raymond Basin, but currently does not operate any active wells within Raymond Basin. The City’s WELO was supplemented in 2010 with *Guidelines for Implementation of the City of Alhambra Water Efficient Landscape Ordinance*. In 2016, Alhambra passed landscaping standards, Alhambra Municipal Code Chapter 23.48, which replaced the original 2009 WELO (Ord. 4552). Under Chapter 23.48, all projects that require landscape and irrigation plan review by the Model WELO are required to submit landscape and irrigation plans compliant with the Model WELO for approval by the Design Review Board (Alhambra 2017a).

**Wastewater**

**State**

Standards for wastewater treatment plant effluent are established using state and federal water quality regulations. After treatment, wastewater effluent is either disposed of or reused as recycled water. The RWQCBs set the specific requirements for community and individual wastewater treatment and disposal and reuse facilities through the issuance of Waste Discharge Requirements (WDR), required for wastewater treatment facilities under the California Water Code Section 13260. The CDPH is also involved in permitting water reuse facilities. Requirements for disposal are set to protect present and potential beneficial uses of the water which receives the effluent. The CDPH sets specific requirements for treated effluent reuse, or recycled water, through Title 22 of the California Code of Regulations (mentioned above with regards to drinking water quality standards). These requirements are primarily set to protect public health.

The California Code of Regulations Title 22, Division 4, Chapter 3, Sections 60301 through 60355 are used to regulate recycled wastewater and are administered jointly by the CDPH and the RWQCBs. Title 22 contains effluent requirements for four levels of wastewater treatment, from non-disinfected secondary recycled water to disinfected tertiary recycled water. Higher levels of treatment have higher effluent standards, allowing for a greater number of uses under Title 22, including irrigation of freeway landscaping, pasture for milk animals, parks and playgrounds, and vineyards and orchards for disinfected tertiary recycled water.
Salt concentrations (such as chloride, nitrogen, sodium, etc.) in the effluent are regulated based on the Water Quality Control Plan (Basin Plan) for the Los Angeles Region, which also considers local groundwater quality. Recycled water quality goals for salts and other constituents vary depending on the intended irrigation recipients. The RWQCB develops waste discharge requirements based on the Basin Plan, designed to protect beneficial uses of State waters. The RWQCB Basin Plan contains an anti-degradation policy so that existing quality shall be maintained (State Water Resources Control Board 2011).

**Solid Waste**

**State**

The California Integrated Waste Management Act of 1989 (AB 939), requires each city or county’s source reduction and recycling element to include an implementation schedule showing that a city or county must divert 50 percent of solid waste from landfill disposal or transformation on and after January 1, 2000. SB 1016, passed in 2008, now requires the 50 percent diversion requirement to be calculated in a per capita disposal rate equivalent.

### 4.13.2 Impact Analysis

**a. Methodology and Significance Thresholds**

According to Appendix G of the *State CEQA Guidelines*, impacts would be considered significant if Plan implementation would:

1. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board
2. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects
3. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects
4. Have insufficient water supplies to serve the project from existing entitlements and resources, or new or expanded entitlements would be needed
5. Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments
6. Be served by a landfill with insufficient permitted capacity to accommodate the project’s solid waste disposal needs
7. Not comply with federal, state, and local statutes and regulations related to solid waste

All of these potential impacts are discussed below.
b. Project and Cumulative Impacts

<table>
<thead>
<tr>
<th>Threshold 2:</th>
<th>Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Threshold 4:</td>
<td>Have insufficient water supplies available to serve the project from existing entitlements and resources, or if new or expanded entitlements are needed?</td>
</tr>
</tbody>
</table>

Impact U-1: **DEVELOPMENT FACILITATED BY THE PLAN WOULD INCREASE WATER DEMAND BY AN ESTIMATED 1.09 MGD, WHICH WOULD NOT EXCEED PROJECTED AVAILABLE WATER SUPPLIES, PROVIDED THROUGH CURRENT WATER SUPPLY SOURCES AND TREATMENT FACILITIES, BY 2040. THEREFORE, IMPACTS RELATED TO WATER SUPPLY AND TREATMENT FACILITIES WOULD BE LESS THAN SIGNIFICANT.**

Development facilitated by the Plan could include such uses as residences, retail space, office space, auto dealerships, industrial space, and hotels. As shown in Table 44, 85 percent of the forecast residential growth is in the form of multi-family units. Since the City is built out, very little undeveloped residential land remains in the City. Future housing growth will occur on existing infill sites or will be integrated with commercial uses. All necessary infrastructure to meet housing development pursuant to the Regional Housing Needs Assessment (RHNA) is already in place. Uses other than residential, such as retail/restaurant space, automobile dealerships, office space, and industrial space would be accommodated in the key focus areas, including West Main Street, Valley Boulevard, Garfield Medical Corridor, and Fremont and Mission Regional Commercial/Industrial Hubs. These areas also have necessary infrastructure in place.

New development would result in a permanent increase in the City’s water demand relative to existing conditions. As shown in Table 6 of Section 2, Project Description, SCAG forecasts that Alhambra’s population will increase by 1,878 persons between 2017 and 2040, from 86,922 in 2017 to 88,800 in 2040. The Plan would accommodate this population increase, but would not induce any growth beyond it.

Alhambra’s 2015 Draft UWMP provides DWR with information on present and future water resources and demand and provides an assessment of the water resource needs of the City of Alhambra. The City is a retail water agency and has developed the 2015 Draft UWMP as an ‘Individual Plan’ independent of the plans of other neighboring retail water jurisdictions. In order to be a reliable document for a minimum of 20 years under Senate Bill 610 and Assembly Bill 221, the 2015 Draft UWMP provides water supply planning to the year 2040 in 5-year increments and identifies water supplies for existing and future demand (including water demand during normal years, single-dry years, and multiple-dry years), and outlines supply reliability under each of these hydrologic conditions (Alhambra 2016).

As shown in Table 44, development that could be facilitated by the Plan would result in an increase in total gross water demand, totaling 1.09 mgd (1,221 AFY). This projected demand is within the projected water demands and projected water supplies for the City in the year 2040, totaling approximately 14,354 AFY, as shown in Table 41 and Table 42 (Alhambra 2016).
Table 44  Projected Water Demand in 2040

<table>
<thead>
<tr>
<th>Potential Building Development/Land Use</th>
<th>Units/Square Footage</th>
<th>Generation Factor</th>
<th>Average Daily Demand (mgd)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>New Residential Uses</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Single-family residential</td>
<td>360 units per parcel</td>
<td>273 gpd/parcel</td>
<td>0.10</td>
</tr>
<tr>
<td>Multi-family residential (duplex)</td>
<td>680 units on 340 parcels (2 units per parcel)</td>
<td>328 gpd/parcel</td>
<td>0.11</td>
</tr>
<tr>
<td>Multi-family residential (triplex)</td>
<td>680 units on 227 parcels (3 units per parcel)</td>
<td>491 gpd/parcel</td>
<td>0.11</td>
</tr>
<tr>
<td>Multi-family residential (fourplex)</td>
<td>680 units on 170 parcels (4 units per parcel)</td>
<td>655 gpd/parcel</td>
<td>0.11</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td>0.43</td>
</tr>
<tr>
<td><strong>New Non-Residential Uses</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail/restaurant space</td>
<td>325,000 SF</td>
<td>1,050 gpd/1,000 sf</td>
<td>0.34</td>
</tr>
<tr>
<td>Automobile Dealerships</td>
<td>4.2 acres (182,952 SF)</td>
<td>105/1,000 sf</td>
<td>0.02</td>
</tr>
<tr>
<td>Office Space</td>
<td>400,000 – 480,000 SF</td>
<td>210 gpd/1000 sf</td>
<td>0.10</td>
</tr>
<tr>
<td>Industrial (Business Park) Space</td>
<td>225,000-400,000 SF</td>
<td>420/1,000 sf</td>
<td>0.17</td>
</tr>
<tr>
<td>Hotels</td>
<td>175-250 rooms</td>
<td>131 gpd/room</td>
<td>0.03</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td>0.66</td>
</tr>
<tr>
<td><strong>Total Gross Water Demand</strong></td>
<td></td>
<td></td>
<td>1.09 mgd (1,221 AFY)</td>
</tr>
</tbody>
</table>

gpd = gallons per day, mgd = million gallons per day

1 Water usage based on 1.05 of wastewater generation factor.

Source: LACSD. Loading Class for Each Class of Land Use. 2017

As described in Section 4.13.1, Setting, the reliability of Alhambra’s water supply is currently dependent on the reliability of its groundwater supplies within the Main Basin, which is managed by the City under two Court judgements, the Long Beach Judgement and the Main Basin Judgement, and the Five-Year Water Quality and Supply Plan. The City has groundwater pumping rights in both the Main Basin and Raymond Basin. The management structures of these Basins ensure a reliable water supply for future water demand. In addition to relying on the management structures of the groundwater Basins, the City has developed future water supply projects to optimize the use of its water rights (see the future water supply discussion in Section 4.13.1, Setting). The City receives imported water from the MWD through the CWEA.

Alhambra’s 2015 Draft UWMP concludes that 2040 projected water supplies under normal year, single-dry year, and multiple dry year conditions would match the projected demand under the same conditions. Historic data indicates the City’s water demand, and the portion of this demand met by groundwater supply, have been declining for the last 10 years despite population growth. This is due to record drought conditions that have occurred state-wide since 2007, which have led to mandatory water use reduction policies, particularly the Water Conservation Act of 2009, required local landscape ordinances, and the Governor’s water use proclamations in 2014 and 2015 mandating further reduction. Despite the fact that greater than average rainfall occurred in many parts of the state during the winter of 2016-2017, Southern California experienced nearly average
rainfall, and the City continues water conservation efforts, as described in this section. The City’s Water Shortage Contingency Plan gives the City authority to declare shortage conditions and implement stages of action to reduce water demand. The plan gives Water Division Staff the authority to monitor and evaluate projected water supply, as well as water demand by its customers. In the event of a water shortage, and depending on the severity of the water shortage conditions, staff can make recommendations to the City Council for water use reduction and the appropriate stage of the Plan to implement. On June 22, 2015, the City implemented the Water Shortage Plan II (Resolution No. R2M15-12), strengthening the City’s water conservation measures.

In summary, the Plan would demand a total water supply of 1.09 MGD (1,221 AFY). This increase would not exceed the Draft UWMP’s projected available water supply of 14,354 acre feet by 2040. Therefore, it is anticipated that water supplies will be sufficient to serve development facilitated by the Plan and impacts to water supplies would be less than significant.

The Plan includes the following goals and policies that aim to protect water resources and ensure that development that does not exceed infrastructure capabilities.

**Services and Infrastructure Goals and Policies**

**Goal R-1**

Maintenance of water supplies that meet the needs of Alhambra residents, businesses, and visitors.

**Policy R-1A** Maintain high quality, reliable water supply, treatment, distribution, pumping, and storage systems to meet current and future daily and peak water demands.

**Policy R-1B** Encourage water conservation and, when feasible, use recycled water in residential, commercial, industrial, public, and other developments.

**Policy R-1C** Efficiently manage water demands and efficiently use urban water supplies.

**Policy R-1D** Focus on further development and implementation of water conservation programs.

**Policy R-1E** Maximize stormwater infiltration and/or infiltration through use of low-impact development methods.

**Policy R-5C** Encourage the use of green building technology for building retrofits and pursuance of LEED-certification for new development.

**Goal SI-9**

A reliable water supply, treatment, and distribution system that meets current and future water demand as affordably as possible, while considering the City’s goals related to resource conservation.

**Policy SI-9A** Maintain, upgrade, and expand water supply, distribution, storage, and treatment facilities to ensure access to adequate water supplies.

**Policy SI-9B** Ensure that local drinking water meets or exceeds federal and state drinking water regulatory standards.

**Policy SI-9C** Explore opportunities to aid in recharge of local groundwater basins.
Adherence to the policies in the Plan would serve to minimize impacts to water supplies and facilities. By limiting development in Alhambra to levels that are within the service capabilities of the City, implementation of the Plan’s goals and policies would ensure that water demand within the City does not exceed available supplies, and that new water treatment facilities or expansion of existing facilities will not be required to meet future demand. Developers would be required to pay for other water infrastructure required to operate proposed developments, and such projects would be subject to individual CEQA environmental review. Therefore, impacts related to water supplies and facilities would be less than significant.

**Mitigation Measures**

Mitigation is not necessary because compliance with Plan policies would reduce the Plan’s impacts to water supplies and facilities to a less than significant level.

<table>
<thead>
<tr>
<th>Threshold 1:</th>
<th>Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Threshold 2:</td>
<td>Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</td>
</tr>
<tr>
<td>Threshold 5:</td>
<td>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 demand in addition to the provider’s existing commitments?</td>
</tr>
</tbody>
</table>

**Impact U-2:** **Development facilitated by the Plan would increase wastewater generation by an estimated 1.04 million gallons per day at the wastewater treatment plants serving the City, which have a combined total excess capacity of 171.4 million gallons per day. Therefore, wastewater impacts would be less than significant.**

Development facilitated by the Plan could increase citywide wastewater generation. Table 45 shows the estimated increase in wastewater generation with projected development under the Plan.

Development forecast under the Plan would result in a wastewater generation total estimated at 1,042,541 gallons per day (gpd), or 1.04 million gallons per day (mgd). The development of new residential uses under the Plan is estimated to generate approximately 40 percent of the additional total wastewater. Non-residential uses would generate the remaining 60 percent.

All wastewater generated in the City would be treated at three off-site regional treatment plants. No wastewater is treated or disposed of within the City boundaries. The JWPCP has a treatment capacity of 400 mgd and currently treats approximately 253.4 mgd; thus, it has 146.6 mgd of available capacity. The WNWRP has a treatment capacity of about 15 mgd and currently treats approximately 7.3 mgd; thus, it has 7.7 mgd of available capacity. The LCWRP has a treatment capacity of 37.5 mgd and currently treats 20.4 mgd, resulting in 17.1 mgd of available capacity (LACSD 2017d). The three plants together have a combined total excess capacity of 171.4 mgd.

Therefore, the treatment capacities at the JWPCP, WNWRP, or LCWRP would be sufficient to serve development facilitated by the Plan, which would generate approximately 1.04 mgd of additional wastewater. Because JWPCP, WNWRP, or LCWRP would have sufficient wastewater treatment capacity to serve new development facilitated by the Plan, the Plan would not exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB).
Table 45  Projected Wastewater Demand in 2040

<table>
<thead>
<tr>
<th>Potential Buildout Development/ Land Use¹</th>
<th>Units/Square Footage</th>
<th>Generation Factor²</th>
<th>Daily Wastewater Generation (gpd)</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Residential Uses</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Single-family residential</td>
<td>360 units</td>
<td>260 gpd/parcel</td>
<td>93,600</td>
</tr>
<tr>
<td>Multi-family residential (duplex)</td>
<td>680 units on 340 parcels (2 units per parcel)</td>
<td>312 gpd/parcel</td>
<td>106,080</td>
</tr>
<tr>
<td>Multi-family residential (triplex)</td>
<td>680 units on 227 parcels (3 units per parcel)</td>
<td>468 gpd/parcel</td>
<td>106,236</td>
</tr>
<tr>
<td>Multi-family residential (fourplex)</td>
<td>680 units on 170 parcels (4 units per parcel)</td>
<td>624 gpd/parcel</td>
<td>106,080</td>
</tr>
<tr>
<td>Subtotal</td>
<td></td>
<td></td>
<td>411,996</td>
</tr>
<tr>
<td>New Non-Residential Uses</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail/restaurant space</td>
<td>325,000 SF</td>
<td>1,000 gpd/1,000 sf</td>
<td>325,000</td>
</tr>
<tr>
<td>Automobile Dealerships</td>
<td>4.2 acres (182,952 SF)</td>
<td>100/1,000 sf</td>
<td>18,295</td>
</tr>
<tr>
<td>Office Space</td>
<td>400,000 – 480,000 SF</td>
<td>200 gpd/1000 sf</td>
<td>96,000</td>
</tr>
<tr>
<td>Industrial (Business Park) Space</td>
<td>225,000-400,000 SF</td>
<td>400/1,000 sf</td>
<td>160,000</td>
</tr>
<tr>
<td>Hotels</td>
<td>175-250 rooms</td>
<td>125 gpd/room</td>
<td>31,250</td>
</tr>
<tr>
<td>Subtotal</td>
<td></td>
<td></td>
<td>630,545</td>
</tr>
<tr>
<td>Total Wastewater Generation</td>
<td></td>
<td></td>
<td>1,042,541</td>
</tr>
</tbody>
</table>

¹ LACSD. Loading Class for Each Class of Land Use. 2017

The LACSD owns, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. The LACSD indicates that presently no deficiencies exist in the LACSD facilities that serve the City (LACSD 2017e). Furthermore, projects that could occur during the lifetime of the Plan would be examined on an individual basis, through the City’s and LACSD’s standard development review processes, to determine their effects on the wastewater infrastructure.

The Plan includes the following policies and actions relating to minimizing impacts associated with wastewater generation.

**Services and Infrastructure Goals and Policies**

**Goal SI-10** A wastewater and stormwater collection and treatment system that meets the needs of existing and planned development.

**Policy SI-10A** Maintain, upgrade, and expand wastewater and stormwater collection facilities to ensure that wastewater and stormwater generated in Alhambra can be effectively managed.

**Policy SI-10B** Track regional treatment system capacity and, as necessary and appropriate, participate in efforts to upgrade or expand treatment capabilities.

**Policy SI-10C** Require that development be connected to the municipal sewer system and ensure that adequate capacity is available for the
treatment of generated wastewater flows and safe disposal of generated sludge.

**Policy SI-10D** Explore ways in which greywater can be used to reduce demands on groundwater and other water supplies.

Because the wastewater treatment provider has adequate capacity to meet forecast demand, no new wastewater treatment facilities or expansion of existing facilities would be necessary. In addition, the wastewater treatment requirements of the LARWQCB would not be violated. Therefore, wastewater impacts would be less than significant.

**Mitigation Measures**

Significant impacts have not been identified; therefore, mitigation is not required.

<table>
<thead>
<tr>
<th>Threshold 3:</th>
<th>Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.</th>
</tr>
</thead>
</table>

**Impact U-3**: DEVELOPMENT FACILITATED BY THE PLAN WOULD INCREASE DEMAND FOR STORMWATER CONVEYANCE, BUT POLICIES TO ENCOURAGE LOW IMPACT DEVELOPMENT AND BEST MANAGEMENT PRACTICES WOULD LIMIT ANY IMPACT. THEREFORE, ENVIRONMENTAL IMPACTS FROM CONSTRUCTION OF NEW STORMWATER DRAINAGE FACILITIES OR EXPANSION OF EXISTING FACILITIES WOULD BE LESS THAN SIGNIFICANT.

The City of Alhambra Sewer and Storm Drain Section of the Utilities Division maintains and operates the sewer collection system, which includes storm drains and catch basins to collect stormwater. Development facilitated by the Plan may increase the amount of impervious surfaces in the City, but would be subject to the regulations discussed under Regulatory Setting in Section 4.7.1e, Water Quality, of this EIR. As described in this section, these regulations include the City’s Low Impact Development (LID) standards (Municipal Code Section 16.36), which contains requirements to integrate LID design principles into new development to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use; and Los Angeles County’s MS4 permit by employing BMPs for on-site detention/retention of stormwater runoff. Impact HWQ-1 and Impact HWQ-2 both conclude that stormwater runoff increases would be less than significant. For these reasons, development facilitated by the Plan would not increase stormwater runoff to the extent that new, off-site stormwater conveyance facilities having a significant environmental effect would be necessary. Additionally, the following goals and policies in the Plan also address this potential impact.

**Resources Policy**

**Policy R-1E** Maximize stormwater infiltration and/or infiltration through use of low-impact development methods.

**Services and Infrastructure Goals and Policies**

**Goal SI-10** A wastewater and stormwater collection and treatment system that meets the needs of existing and planned development.

**Policy SI-10A** Maintain, upgrade, and expand wastewater and stormwater collection facilities to ensure that wastewater and stormwater generated in Alhambra can be effectively managed.
Environmental Impact Analysis
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Policy SI-10E  Require storm drain infrastructure that implements Low-Impact Development practices (bioretention areas, cisterns, and/or rain barrels) and incorporates state-of-the-art best management practices.

In an effort to reduce runoff and water quality impacts, the City, through its General Plan, encourages Low Impact Development (LID) and Best management Practices (BMPs) to limit excess water runoff and discharge into waterways. Stormwater policies in the 2040 General Plan would promote the mitigation of stormwater runoff through collection, drainage, and sustainable practices.

Mitigation Measures

Significant impacts have not been identified; therefore, mitigation is not required.

Threshold 6:  Be served by a landfill with insufficient permitted capacity to accommodate the project’s solid waste disposal needs?

Threshold 7:  Not comply with federal, State, and local statutes and regulations related to solid waste?

Impact U-4:  Development facilitated by the Plan would incrementally reduce the lifespan of the fourteen landfills currently utilized by the City. However, the City’s current 65 percent diversion rate would reduce solid waste directed toward these landfills, which have sufficient capacity to accommodate the increase in solid waste generation that is projected to occur under the Plan. Therefore, environmental impacts from the increase in solid waste generated by new development would be less than significant.

Development facilitated by the Plan would add an estimated 360 single-family residential units and 2,040 multi-family residential units (i.e., duplexes, triplexes, and fourplexes). Solid waste generated from residential uses is a function of the number of homes, household size, and per capita waste generation. CalRecycle estimates that single-family residential uses and multi-family uses generate an average of 12.23 and 4 pounds of solid waste per household per day, respectively (Cal Recycle 2004). Therefore, prior to implementation of recycling programs or State-mandated diversion requirements, residential development facilitated by the Plan would generate approximately 12,563 pounds, or 6.3 tons, of solid waste per day, as shown in Table 46.

In addition, development facilitated by the Plan would add new non-residential uses to the City, estimated at 325,000 square feet of retail/restaurant space, 4.2 acres of automobile dealership space, 480,000 square feet of office space, 571 employees in industrial (business park) space, and 250 hotel rooms. Using the solid waste generation rates for non-residential uses shown in Table 46, prior to implementation of recycling programs or State-mandated diversion requirements, non-residential development facilitated by the Plan would generate approximately 12,076 pounds, or 6.0 tons, of solid waste per day.

As shown in Table 46, adding together the estimated waste generation from new residential uses and new non-residential uses discussed above, development facilitated by the Plan could generate approximately 24,639 pounds, or 12.3 tons, of solid waste per day. Implementation of the City’s current 65 percent diversion rate would reduce this solid waste generation to 4.3 tons per day.
### Table 46  Projected Solid Waste Generation Increase by 2040

<table>
<thead>
<tr>
<th>Potential Buildout Development/ Land Use</th>
<th>Units/ Square Footage</th>
<th>Generation Factor</th>
<th>Daily Solid Waste Generation</th>
<th>65% Daily Solid Waste Diversion</th>
<th>Daily Solid Waste Disposal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>New Residential Uses</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Single-family residential</td>
<td>360 units</td>
<td>12.23 lb/household/day</td>
<td>4,403 lbs/day</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Multi-family residential (duplex)</td>
<td>680 units</td>
<td>4 lb/dwelling unit/day</td>
<td>2,720 lbs/day</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Multi-family residential (triplex)</td>
<td>680 units</td>
<td>4 lb/dwelling unit/day</td>
<td>2,720 lbs/day</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Multi-family residential (fourplex)</td>
<td>680 units</td>
<td>4 lb/dwelling unit/day</td>
<td>2,720 lbs/day</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td>12,563 lbs/day</td>
<td>6.3 tons/day</td>
<td>4.1 tons/day 2.2 tons/day</td>
</tr>
<tr>
<td><strong>New Non-Residential Uses</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail/restaurant space</td>
<td>325,000 sf</td>
<td>0.006 lb/sf/day</td>
<td>1,950 lbs/day</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Automobile dealerships</td>
<td>4.2 acres (182,952 sf)</td>
<td>0.9 lb/100 sf/day</td>
<td>1,647 lbs/day</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Office space</td>
<td>400,000 – 480,000 sf</td>
<td>0.006 lb/sf/day</td>
<td>2,880 lbs/day</td>
<td>880 lbs/day</td>
<td></td>
</tr>
<tr>
<td>Industrial (business park) space</td>
<td>571 employees</td>
<td>8.93 lb/employee/day</td>
<td>5,099 lbs/day</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hotels</td>
<td>175-250 rooms</td>
<td>2 lb/room/day</td>
<td>500 lbs/day</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td>12,076 lbs/day</td>
<td>6.0 tons/day</td>
<td>3.9 tons/day 2.1 tons/day</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td></td>
<td>24,639 lbs/day</td>
<td>12.3 tons/day</td>
<td>8.0 tons/day 4.3 tons/day</td>
</tr>
</tbody>
</table>


Alhambra’s 2016 diversion rate is 65 percent.

As shown in Table 43, Alhambra currently utilizes 14 landfills, which have a total maximum permitted throughput of 97,658 tons/day, and a total remaining capacity of 686,794,303 tons. The additional 4.3 tons/day generated by development facilitated by the Plan would represent 0.004 percent of these landfills’ maximum permitted throughput per day. While this additional 4.3 tons/day would represent a small percentage of the total amount of waste sent to these landfills compared to their permitted throughput and remaining capacity, it would add to overall demands on these landfills, and could contribute to the acceleration of the closure timelines for some landfills, which could in turn require the use of more distant sites for waste disposal. The Chiquita Canyon Sanitary Landfill, Sunshine Canyon Landfill, Olinda Alpha Sanitary Landfill, and the Mid-Valley Sanitary Landfill are currently expected to cease operation in the year 2019, 2037, 2021, and 2033, respectively, within the 2040 horizon year of the Plan. Solid waste generated in the City
beyond the closure dates of these landfills would be diverted to the ten landfill sites still in operation. The total remaining capacity of those ten landfills (approximately 520,902,602 tons) would be sufficient to accept the waste generated by the development facilitated by the Plan.

Potential future developments facilitated by the Plan would be reviewed on a project-by-project basis; solid waste impacts of these developments would be evaluated based on existing and planned disposal facilities and their available capacities. The Services and Infrastructure Element of the Plan includes the following goal and policies to ensure continued effective management of solid waste generated in Alhambra.

**Services and Infrastructure Goals and Policies**

**Goal SI-II**
Solid waste services that meet the demands of residents and businesses while operating in accord with applicable state requirements pertaining to solid waste diversion.

- **Policy SI-11A** Provide an adequate and orderly system for collection and disposal of solid waste for existing and future development.
- **Policy SI-11B** As feasible, emphasize source reduction and recycling in order to maximize diversion of waste from area landfills.
- **Policy SI-11C** As area landfills close, explore alternative strategies for minimizing waste generation and disposing of waste in an environmentally sensitive manner.

Compliance with these policies, existing City programs, and other applicable regulatory requirements would further reduce the less than significant impacts to solid waste.

**Mitigation Measure**

Significant impacts have not been identified; therefore, mitigation is not required.
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4.14 Effects Found Not to Be Significant

This section discusses those factors determined to be less than significant that do not require a full environmental impact analysis, or which are analyzed in other sections of the EIR. Environmental factors discussed in this section include Agricultural Resources, Biological Resources, Mineral Resources, and Recreation.

4.14.1 Agricultural and Forestry Resources

The Plan Area is fully urbanized, with no areas in Alhambra are under agricultural or forestry production. This is reflected by the fact that the Plan Area, like all of Los Angeles County south of the San Gabriel Mountains (except for the western San Fernando Valley and the Santa Monica Mountains and coast west of Topanga Beach) is outside the survey area of the “Los Angeles County Important Farmland 2014” map produced by the California Department of Conservation, Division of Land Resource Protection (DOC, 2016). Furthermore, there is no existing or proposed land use or zoning designations that would support farming or forestry in Alhambra. Therefore, the Plan would have no impact on agricultural and forestry resources.

4.14.2 Biological Resources

Alhambra is an urbanized city in a large metropolitan area. Due to the fact that the City is fully developed, and retains no suitable natural habitat for special-status species, no rare, endangered, or special-status plant and animal species are known or suspected to exist (Blodgett Baylosis Environmental Planning, 2018). Additionally, the Plan would have no direct impact on biological resources, as the Plan does not include any physical development and does not propose any changes to land use that would impact such resources.

Nesting birds could be affected by projects facilitated by the Plan if these projects removed, damaged, or created disturbance in trees in which birds were nesting. The City does not have any existing ordinances specifically protecting biological resources (such as nesting birds or trees), but nesting birds are protected under existing federal regulations, such as the Migratory Bird Treaty Act, which would apply to any future development facilitated by the Plan. Therefore, the Plan’s potential impact on biological resources would be less than significant. Furthermore, environmental review would be required for future discretionary projects facilitated by the Plan, in order to determine whether they would impact biological resources, and to require mitigation measures, if necessary, to avoid or reduce impacts to such resources.

4.14.3 Mineral Resources

Soil types found in the City, such as gravely loams, sandy loams, and clays, do not contain any significant mineral resources. Therefore, implementation of the Plan would have no impact related to mineral resources.
4.14.4 Recreation

The impact analysis relating to recreation is described in detail under Section 4.11, *Public Services*, under the *Recreational Services* subsection. Under this section, the analysis determines if the Plan would result in substantial adverse physical impacts to recreational facilities; or if the Plan would include recreational facilities or requires the construction or expansion of recreational facilities, resulting in significant environmental impacts. The analysis in Section 4.11 determines that these impacts would be less than significant.
5 Other CEQA Required Discussions

This section discusses other issues for which CEQA requires analysis in addition to the specific issue areas discussed in Section 4, Environmental Impact Analysis. These additional issues include the Plan’s potential growth inducing effects, and the Plan’s significant and irreversible impacts on the environment.

5.1 Growth Inducing Effects

Section 15126.2(d) of the state CEQA Guidelines requires that EIRs discuss a project’s potential to induce growth, either directly or indirectly. CEQA also requires a discussion of ways in which a project may remove obstacles to growth.

5.1.1 Population and Employment Growth

As discussed in Section 4.10, Population and Housing, development facilitated by the Plan would introduce an estimated 1,842 housing units to the City’s housing stock. This would add an estimated 1,878 residents to the City’s 2017 population of 86,922, resulting in a 2040 population of 88,800. The net addition of about 1,800 residents over a 20-plus-year period would amount to a 2040 population about two percent higher than the 2017 population. As shown in Table 7, SCAG forecasts that job growth in Alhambra during the lifetime of the Plan would be about 4,800 jobs from 2015 to 2040, a 16.7 percent increase over 2015 levels, bringing total employment in Alhambra to 33,500 jobs.

Additionally, policies in the Plan would help manage the use of land so that growth, development, and redevelopment occur in an orderly manner. The following Plan policies would guide growth in the City:

**Policy LU–1B**  Protect and enhance the unique character and identify of single-family neighborhoods

**Policy LU–1E**  Discourage scattered multi-family development and encourage the preservation of existing, stable single-family neighborhoods

**Policy LU–7C**  Provide appropriate buffers between commercial and residential uses

**Policy QL–6A**  Where feasible and desirable, add new recreation facilities such as dog parks and fitness courses

**Policy QL–6G**  Where feasible and desirable, utilize vacant properties to provide new open space and passive recreation opportunities in the form of pocket parks and/or community gardens

No exceedance of the population forecasts upon which SCAG’s RTP/SCS and SCAQMD’s 2012 AQMP are based is anticipated. It is the specific purpose of the Plan to accommodate the orderly development of Alhambra. Therefore, by its nature, the Plan is intended to reduce the potential for uncontrolled growth in Alhambra and the environmental impacts associated with uncontrolled growth.
5.1.2 Removal of Obstacles to Growth

Alhambra is an urbanized community served by existing infrastructure. As discussed in Section 4.13, Utilities and Service Systems, and Section 4.7, Hydrology and Water Quality, existing infrastructure in Alhambra would be adequate to serve development facilitated by the Plan. There is no potential for the City to expand outward, as it is entirely surrounded by other incorporated cities in the western San Gabriel Valley region of Los Angeles County. Thus, all new development envisioned in the Plan would occur in Alhambra’s current City limits. As discussed in Section 2, Project Description, the Plan encourages the reuse of already developed areas. Generally, most new development would result in re-use of properties, conversion of properties to different uses in response to market demand (e.g., select industrial to commercial), and more intense use of land in defined focus areas. Growth in the City is anticipated to consist of infill development rather than development on greenfield sites. Furthermore, the Plan emphasizes bicycle connections and pedestrian-oriented focus areas; proposes focus areas and activity nodes to help shape and distribute new development; promotes protecting the character of existing residential neighborhoods; and outlines the future role and form of Alhambra’s public realm. No new roads would be required. Therefore, the Plan would not remove obstacles to growth.

5.2 Irreversible Environmental Effects

Section 15126.2(c) of the CEQA Guidelines requires that EIRs evaluating projects involving amendments to public plans, ordinances, or policies contain a discussion of significant irreversible environmental changes. CEQA also requires decision-makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed project.

Construction activity facilitated by the Plan would involve the use of building materials and energy, some of which are non-renewable resources. Consumption of these resources would occur with any development in the region and are not unique to Alhambra or the Plan. New development in the City during the lifetime of the Plan would increase local demand for non-renewable energy resources such as petroleum and natural gas, although increasingly efficient building fixtures and automobile engines, and a state energy portfolio increasingly generated from renewable resources, as well as implementation of policies included in the Plan, are expected to offset this increased demand, either in whole or in part. For these reasons, and because of Alhambra’s relatively small size compared to the region, growth facilitated by the Plan would not significantly affect local or regional energy supplies. The following Plan policies encourage new developments to be more sustainable:

**Policy R-1B** Encourage water conservation and, when feasible, use recycled water in residential, commercial, industrial, public, and other developments

**Policy R-2B** Explore opportunities to incorporate green space into development projects and expand open spaces within the City

**Policy R-3B** Encourage the use of energy saving designs, systems, and innovations in public and private building construction

**Policy R-3C** Promote using renewable energy, such as solar panels, throughout the City
Other CEQA Required Discussions

Policy R-5A  Facilitate compact development patterns that minimize motor vehicles trips and VMT while maintaining community character

Policy R-5C  Encourage the use of green building technology for building retrofits and pursue LEED-certification for new development

Policy R-5D  Incorporate GHG reduction strategies into urban design and planning

Growth facilitated by the Plan would require an irreversible commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. As discussed in Sections 4.11, Public Services, and 4.13, Utilities and Service Systems, impacts to public services and utilities would be reduced to a less than significant level with adherence to Plan policies and federal, state, and regional regulations.

The additional vehicle trips associated with growth under the Plan would incrementally increase local traffic, noise levels, and regional air pollutant emissions. As discussed in Section 4.2, Air Quality, implementation of policies included in the Plan promoting re-use and infill development and limiting future growth in population could reduce the air pollutant emissions associated with individual future development projects to below significance thresholds. As discussed in Section 4.9, Noise, potentially significant impacts would result if construction and operational vibration levels caused disturbance to sensitive receptors or physical damage to fragile buildings, but the City’s Municipal Code and Plan policies would address potentially-significant noise and vibration activity associated with development under the Plan, and reduce these potential impacts to a less than significant level. As discussed in Section 4.12, Transportation/Traffic, traffic generated as a result of development facilitated by the Plan would degrade operations at a number of intersections to below level of service performance standards. While Mitigation Measure T-1 would reduce the impact at one intersection, most intersections would have no feasible mitigation and this impact would remain significant and unavoidable. Additionally, trips generated by projects facilitated by the Plan would contribute to cumulative traffic increases that would degrade operations on the I-10 freeway corridor and on the I-10 freeway off-ramps to below identified significance thresholds, but Mitigation Measure T-2 would reduce this impact to a less than significant level.
6 Alternatives

As required by Section 15126.6 of the *State CEQA Guidelines* (CEQA Guidelines), this section of the EIR examines a range of alternatives to the Plan. Included in this analysis are the CEQA-required “no project” alternatives (no growth, and growth in accordance with the City’s current General Plan). In addition, a Relocated Focus Area Alternative is proposed to address potential traffic impacts associated with planned growth in certain areas. The alternatives are listed below:

- Alternative 1: No Project (see Section 6.1)
- Alternative 2: Relocated Focus Areas (see Section 6.2)

As required by CEQA, this section includes a discussion of the “environmentally superior alternative” among those studied (see Section 6.3).

Section 15126.6(a) of the CEQA Guidelines states the following:

“An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

The City of Alhambra, in its role as lead agency, has determined that the alternatives analyzed in this section of the EIR represent a reasonable range of alternatives to the Plan. Section 6.4 of this EIR includes a discussion of alternatives considered but rejected by the lead agency because they either did not meet the objectives of the project, were considered infeasible, or would not avoid or substantially lessen one or more significant effects of the proposed project.

6.1 No Project

The “No Project” alternative involves continued implementation of the City’s current General Plan. This alternative assumes that the City’s existing General Plan policies would continue to facilitate development in accordance with existing land use designations. The overall amount of growth anticipated to occur under the City’s current General Plan is roughly equivalent to what could be facilitated under the proposed Plan; therefore, population growth within the City under the current General Plan would also be expected to reach the SCAG forecast of 88,800 by 2040, as shown in Table 6 in Section 2.3.6 of this EIR. The City also considered a “no growth” version of the No Project alternative, but rejected it as infeasible for the reasons discussed in Section 6.4a of this EIR.

While the Plan preserves the existing pattern of uses in most of the City and provides for protection of established neighborhoods, it also identifies focus areas, shown in the Vision Plan (Figure 3), that
offer unique characteristics and may provide opportunities to transition over time with adjustments in land use, beautification, and place making. In contrast, the No Project Alternative would continue to facilitate development in the same pattern as is currently seen in the City. This pattern of land uses is reflected in the City’s current Land Use Policy Map, shown in Figure 44.

Under the Plan, new development would generally result from re-use of properties, conversion of uses in response to market demand (e.g., select industrial to commercial), and more intense use of land in defined areas. While new development under the No Project Alternative would also result from re-use of properties and conversion of uses in response to market demand, this alternative would not include the focus areas included under the Plan. Therefore, rather than potentially creating more intense use of land in the geographically well-defined focus areas, the same amount of new, market-driven development would occur, but would be more likely to be spread out across a wider area of the City, and without the adjustments in land use, beautification, and place making included in the Plan.

6.1.1 Impact Analysis

a. Aesthetics

As discussed in Impact AES-3, the Plan, when compared to the City’s current General Plan, places a greater emphasis on building form and character in districts and neighborhoods to allow a mix of land uses, and emphasizes improved gateways, and improved (and in some cases redefined) corridors. The Plan defines (both physically and visually) the desired visual character and quality of these areas, and sets forth urban form policies to ensure that the City retains the unique aesthetic qualities valued by its residents. The Plan does not call for substantial changes to established residential neighborhoods and includes specific policies aimed at retaining the character of the neighborhoods. The No Project alternative would not include these elements, and could therefore lead to a lower level of visual character and quality for certain parts of the City, and perhaps for the City as a whole. This alternative would therefore have potentially greater aesthetic impacts than the Plan.

b. Cultural Resources

The Plan does not call for substantial changes to established residential neighborhoods and includes specific policies aimed at preserving historic resources. The No Project Alternative would not include these elements and would, therefore, be more likely than the Plan to lead to or allow the loss of, or negative effects on, historic resources. This alternative would therefore have potentially greater impacts to cultural resources than the Plan.

c. Land Use and Planning

As discussed under Impact LU-1, the Plan would be generally consistent with the policies of SCAG’s RCP and RTP/SCS for many reasons, including the fact that it would encourage infill development within focus areas located along major transportation corridors that would be well-served by public transit, increase access to open space, and develop “Complete Communities” while protecting stable, existing single-family areas. The No Project Alternative would not be as consistent with these policies, since it would not include the Plan features and policies discussed in Impact LU-1. Therefore, this alternative would have greater impacts related Land Use/Planning than the Plan.
Figure 44 Current Land Use Policy Map for the City of Alhambra
d. Population and Housing

For most of the City, land use types and intensities are the same under both the current General Plan and the proposed Plan. One exception is the new Medical Office land use designation that the Plan would apply to areas currently designated Office Professional in the proposed Garfield Medical Office Corridor focus area along Garfield Avenue from Mission Road to Shorb Street. The Medical Office designation would allow medical, professional, and administrative offices, hospitals, medical and dental clinics, laboratories, public and quasi-public uses, and similar and compatible uses; whereas the Office Professional designation allows professional, financial, administrative, medical, and general business office use. This area already contains medical office buildings, but also single-family and multi-family homes, and non-medical office buildings. While allowed uses and development standards would not change significantly under the Plan compared to the current General Plan, the intent of applying the Medical Office designation in this area, as shown in Item F on the proposed Vision Plan (Figure 3) is to support medical uses for Garfield Avenue that transition out aged multi-family housing. As explained in Impact PH-2 in Section 4.10, Population and Housing, of this EIR, this may lead to housing currently located in the proposed Garfield Medical Office Corridor focus area being replaced with medical or other office uses, leading to potential displacement of housing and its residents, but the net increase of 1,842 housing units anticipated under the Plan would be adequate to house those potentially displaced. The No Project Alternative, however, might avoid some of this potential displacement if it resulted in less redevelopment in this area and conversion of properties from residential to office uses in this area, and would thus have slightly less potential impact related to population and housing than the Plan.

e. Transportation/Traffic

While the overall amount of growth anticipated to occur under the City’s current General Plan is roughly equivalent to what could be facilitated under the proposed Plan, the No Project Alternative, because it would not include the focus areas shown in the Vision Plan (Figure 3), would tend to spread future development across a wider area of the City, rather than focusing it in geographically well-defined areas. This alternative, compared to implementation of the Plan, would therefore avoid the changes in vehicular trip distribution described in Table 34 in Section 4.12, Transportation/Traffic, of this EIR. Under the Plan, the change in V/C ratio at 14 intersections due to implementation of the Plan rather than the No Project Alternative would equal or exceed the City’s V/C ratio threshold for significance during one or both of the analyzed peak hours. This is generally attributable to the Plan’s focus areas, which would tend to concentrate traffic in and around these areas, rather than distributing it more evenly throughout the City. Additionally, many of the focus areas are located in the southern half of the City (south of Mission Road), and this would tend to not only increase traffic in this general geographic area, but also potentially lead to more trips using the I-10 freeway and its on- and off-ramps, since this area is closer to the I-10 than parts of the City further to the north. The No Project Alternative would not, however, avoid the Plan’s significant and unavoidable LOS intersection and freeway impacts, because it would still lead to many significantly impacted intersections compared to existing conditions (see Section 6.2). These impacts would therefore be reduced, but still remain significant and unavoidable, under the No Project Alternative.

f. All Other Environmental Impacts

Overall, other environmental impacts associated with this alternative would be similar to those of the Plan, since the total amount of development would be similar. Implementation of Plan policies
and actions, as well as mitigation measures included in this EIR, would generally avoid significant impacts under either this alternative or the proposed project.

g. Conclusion

As with the Plan, the only unavoidably significant impacts under the No Project Alternative would be impacts to LOS at many intersections throughout Alhambra, as discussed in Impact T-1; and impacts to operation of the I-10 freeway corridor and off-ramps, as discussed in Impact T-2. Compared to the Plan, this alternative would potentially reduce impacts in the areas of Population and Housing and Transportation/Traffic, but increase them in the areas of Aesthetics, Cultural Resources, and Land Use and Planning. Since it would involve three potentially increased impacts and two potentially reduced impacts, but would otherwise have similar impacts as the Plan, the environmental impacts of the No Project Alternative would be similar to, but incrementally greater than those of the Plan.

6.2 Relocated Focus Area

The “Relocated Focus Area” Alternative involves shifting the location of one of the focus areas identified in the Plan, in an attempt to avoid growth-related impacts in certain areas. In particular, this alternative is designed to avoid or lessen the Plan’s significant and unavoidable traffic impacts, which occur at 20 out of 21 intersections that would be significantly impacted by the Plan (compared to existing conditions), with impacts at the other one of these significantly impacted intersections being mitigable (see Mitigation Measure T-2). The location of these intersections is shown in Figure 45. The Plan would also have significant and unavoidable LOS impacts to the operation of the I-10 freeway corridor and on- and off-ramps.

Given the fact that 14 of the 21 significantly impacted intersections would occur in the southern half of Alhambra (on or south of Mission Road), and the I-10 freeway corridor and on- and off-ramps are also located in the southern half of Alhambra, this alternative involves relocating one of the Plan focus areas located in the southern half of Alhambra to the northern half of Alhambra. The East Valley Boulevard Entertainment District focus area, shown as area G on the Vision Plan (Figure 3) was chosen as the focus area to be moved, since it is near several significantly impacted intersections along Garfield Avenue and Valley Boulevard, and because the new hotel and entertainment uses that could be encouraged by this focus area could have relatively high trip generation potential compared to existing uses.

Under this alternative, this focus area would be relocated to West Main Street. West Main Street was chosen because it is located in the northern half of Alhambra; it is a major thoroughfare with commercially-designated land and ample right of way for both vehicles and other modes of travel.

6.2.1 Impact Analysis

a. Aesthetics

The Relocated Focus Area Alternative would retain the Plan’s emphasis on building form and character in districts and neighborhoods to allow a mix of land uses, and emphasis on improved gateways and improved (and in some cases redefined) corridors. The main difference between this alternative and the Plan would be that it could increase the intensity of development on West Main Street by encouraging the creation of the entertainment district envisioned in the Plan in this area, rather than on East Valley Boulevard near the City’s eastern boundary with San Gabriel. The
Figure 45 Intersections Significantly Impacted by Plan
The entertainment district concept includes a mix of retail, entertainment, and hospitality uses, and is illustrated in Figure 8 in Section 2.3.5, Key Updates, of this EIR.

As shown in Figure 8, this entertainment district concept envisions buildings of up to four stories, which would exceed the height of most buildings currently located on West Main Street (with the exception of a few buildings near its intersection with Fremont Avenue, such as the four-story Alhambra Inn and a three-story building across the street from it at 2510 West Main Street). In contrast, the Plan calls for creating a more pedestrian-oriented environment with broad sidewalks, landscaping, and outdoor dining streetscape improvements on West Main Street, as illustrated in Figure 6 in Section 2.3.5 of this EIR, but without the major intensification that has occurred in the Central Business District. The improvements illustrated in Figure 6 would not involve increasing the height or development intensity of buildings in this area.

While increased building heights or development intensity in certain locations on West Main Street would not necessarily create negative impacts to visual quality, it could affect the visual character of the area by giving it a higher-density, more developed feel. On the other hand, the uses proposed to be included in the entertainment district would be similar to uses already allowed within the General Commercial land use designation along West Main Street, including hotels and entertainment uses (see Table 4 in Section 2, Project Description). Also, the proposed entertainment district would potentially create the same change in visual character related to building height and development intensity in its currently-proposed location on East Valley Boulevard. In fact, building heights and development intensity are even lower along this part of East Valley Boulevard than they are along West Main Street. However, development of the concept shown in Figure 8 would generally improve the visual quality of the areas in which it is proposed on East Valley Boulevard, which have large areas of visually unattractive frontage surface parking lots; but less of a positive impact on visual quality on West Main, where the visual quality of the streetscape and surrounding development is already relatively high.

Overall, this alternative would shift the potentially significant visual character impacts of the proposed entertainment district from East Valley Boulevard to West Main Street, but would not have some of the potentially positive impacts on visual quality along East Valley Boulevard. Therefore, the Relocated Focus Area alternative would have a greater overall impact on aesthetics than the Plan.

b. Cultural Resources

The Plan does not call for substantial changes to established residential neighborhoods and includes specific policies aimed at preserving historic resources. The Relocated Focus Area Alternative would also include these elements and would therefore be no more likely than the Plan to lead to or allow the loss of, or negative effects on, historic resources. This alternative would therefore have the same impact on cultural resources as the Plan.

c. Land Use and Planning

As discussed under Impact LU-1, the Plan would be generally consistent with the policies of SCAG’s RCP and RTP/SCS for many reasons, including the fact that it would encourage infill development within focus areas located along major transportation corridors that would be well-served by public transit, increase access to open space, and develop “Complete Communities” while protecting stable, existing single-family areas. The Relocated Focus Area Alternative would be equally consistent with these policies, since it would include all the same Plan features and policies.
discussed in Impact LU-1. Therefore, this alternative’s impacts related Land Use/Planning would be the same as those of the Plan.

d. Population and Housing

The Relocated Focus Area Alternative would, like the Plan, apply the new Medical Office land use designation to areas currently designated Office Professional in the proposed Garfield Medical Office Corridor focus area along Garfield Avenue from Mission Road to Shorb Street. This alternative would therefore have the same potential to lead to housing currently located in the proposed Garfield Medical Office Corridor focus area being replaced with medical or other office uses, leading to potential displacement of housing and its residents. The net increase of 1,842 housing units anticipated under the Plan would, however, also occur under this alternative, and would be adequate to house those potentially displaced. This alternative would therefore have similar impacts on Population and Housing as the Plan.

e. Transportation/Traffic

As explained in the introduction to this alternative, the Relocated Focus Area Alternative is designed to avoid or lessen the Plan’s significant and unavoidable traffic impacts, which occur at 20 out of 21 intersections that would be significantly impacted by the Plan (compared to existing conditions), with impacts at the other one of these significantly impacted intersections being mitigable (see Mitigation Measure T-2); as well as on the I-10 freeway corridor and off-ramps. Because more of these impacted intersections are in the southern half of Alhambra than the northern half, this alternative moves the East Valley Boulevard Entertainment District focus area to West Main Street. This alternative would lead to a reduction in trips on East Valley Boulevard and nearby areas, potentially alleviating significant LOS impacts at intersections along Garfield Avenue and Valley Boulevard, as well as potentially reducing trips at significantly impacted freeway ramp locations and on the I-10 mainline. However, since this alternative would relocate the potential development associated with the proposed entertainment district to West Main Street, these trips would generally be relocated to this and nearby areas. While there are generally fewer significantly impacted intersections in the northern half of the community, Figure 45 shows several significantly impacted intersections in the vicinity of West Main Street, and five significantly impacted intersections on Fremont Avenue between the northern City limits and the I-10 freeway.

Intersections along Fremont, Main Street, and in the northern and western parts of Alhambra would experience increased traffic impacts under this alternative, while intersections in the southern and eastern parts of the community, especially along Valley Boulevard, would experience reduced traffic impacts. For example, trips coming from the I-10 to the entertainment district would tend to access Valley Boulevard via the Garfield Avenue or New Avenue ramps under the Plan, but would access the entertainment district via Fremont Avenue (either directly from the I-10 ramps or via the I-710 to Valley Boulevard) under the Relocated Focus Area Alternative. This shift in trips would not, however, significantly affect the overall number of trips, since the total amount of development would remain the same under either scenario, and significant and unmitigable LOS impacts at intersections throughout the City would occur under either scenario. This alternative would therefore have similarly significant traffic impacts as the Plan, but shift their geographic location.

f. All Other Environmental Impacts

Overall, other environmental impacts associated with this alternative would be similar to those of the Plan, since the total amount of development would be similar. Implementation of Plan policies
and actions, as well as mitigation measures included in this EIR, would generally avoid significant impacts under either this alternative or the proposed project.

**g. Conclusion**

As with the Plan, the only unavoidably significant impacts under the Relocated Focus Area Alternative would be impacts to LOS at many intersections throughout Alhambra, as discussed in Impact T-1; and impacts to operation of the I-10 freeway corridor and off-ramps, as discussed in Impact T-2. Compared to the Plan, this alternative would potentially increase impacts related to aesthetics (visual quality), but would otherwise have impacts that would have a similar level of significance as those of the Plan. Since the only difference in impacts compared to the Plan would be potentially increased impacts to aesthetics, the environmental impacts of the Relocated Focus Area Alternative would be greater than those of the Plan.

**6.3 Environmentally Superior Alternative**

CEQA requires the identification of the environmentally superior alternative among the options studied. When the “No Project” alternative is determined to be environmentally superior, CEQA also requires identification of the environmentally superior alternative among the development options.

As shown in Table 47, neither of the studied alternatives would, overall, be environmentally superior to the Plan, although the No Project Alternative would be environmentally superior compared to the Plan in the areas of Population and Housing and Transportation/Traffic. When the two alternatives are compared to each other, the No Project Alternative would be environmentally superior because it would alleviate Plan impacts in the areas of Population and Housing and Transportation/Traffic, while the Relocated Focus Area Alternative would not alleviate Plan impacts in any environmental impact area.

**Table 47 Impact Comparison of Alternatives**

<table>
<thead>
<tr>
<th>Issue</th>
<th>No Project Alternative</th>
<th>Relocated Focus Area Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aesthetics</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Cultural Resources</td>
<td>-</td>
<td>=</td>
</tr>
<tr>
<td>Land Use and Planning</td>
<td>-</td>
<td>=</td>
</tr>
<tr>
<td>Population and Housing</td>
<td>+</td>
<td>=</td>
</tr>
<tr>
<td>Transportation/Traffic</td>
<td>+</td>
<td>=</td>
</tr>
<tr>
<td>All Other Environmental Impacts</td>
<td>=</td>
<td>=</td>
</tr>
</tbody>
</table>

+ Superior to the proposed project (reduced level of impact)
- Inferior to the proposed project (increased level of impact)
= Similar level of impact to the proposed project
6.4 Alternatives Considered But Rejected

Section 15126.6 (c) of the CEQA Guidelines requires that an EIR identify those alternatives that were considered but rejected by the lead agency because they either did not meet the objectives of the project, were considered infeasible, or would not avoid or substantially lessen one or more significant effects of the proposed project. The City of Alhambra, which is the lead agency for the Plan, considered the following alternatives but rejected them for the reasons given below. No other alternatives were identified that would feasibly attain most of the basic project objectives but would also avoid or substantially lessen the significant effects of the project.

a. No Growth/Reduced Growth

The No Growth option is a version of the CEQA-required “No Project” alternative, but instead of buildout of the currently-adopted General Plan, it would mean no more development compared to current conditions. The Reduced Growth option would limit the amount of growth that could occur in Alhambra. Both options were determined to be infeasible. The No Growth option is not realistic because some development in Alhambra is already allowed under existing land use designations and zoning, and in some cases may have already received approvals or other entitlements. The No Growth option would require a growth moratorium ordinance that would restrict property development rights that already exist under existing policies and regulations, which could raise issues related to property rights and takings. The Reduced Growth option would require some sort of growth control since the forecast of growth for the proposed General Plan is based on SCAG forecasts and because, as proposed, the General Plan would not allow growth beyond that which could occur under the current General Plan. Additionally, the No Growth option would not meet three out of four of the Plan’s objectives, which are listed in Section 2.3.1 of this EIR, and the Reduced Growth option would meet likely meet these objectives to a lesser degree than under the proposed General Plan. The three objectives this alternative would not meet are the following:

- Enhanced commercial corridors with a mix of office, retail, entertainment, and lodging that meets the needs of residents while attracting visitors
- Industrial and commercial districts that meet local demand, create good jobs, and take advantage of the City's location near downtown Los Angeles
- A beautiful community with improved streetscapes, gateways, and parks

The No Growth option would not meet these objectives because all of them would require at least some development. By restricting development, the Reduced Growth option would be expected to reduce the potential for new office, retail, entertainment, and job-producing activities, which in turn could limit the community’s potential for beautification.

b. Convert the Alhambra Golf Course to a Public Park

Some members of the public suggested during the EIR scoping process that the City convert the Alhambra Golf Course, which is located within Almansor Park, to provide more public park space to the community. This alternative would not, however, avoid or substantially lessen any significant effects of the proposed project, because a lack of public park space has not been identified as a significant environmental impact in this EIR. The Plan includes policies to encourage the creation of new recreational and park spaces, such as Policy QL-6B (Investigate the feasibility of a new regional park in the I-710 right-of-way) and Policy QL-6G (Where feasible and desirable, utilize vacant properties to provide new open space and passive recreation opportunities in the form of pocket...
parks and/or community gardens). Additionally, while there is a fee to use it, the golf course is open to the public (Alhambra Golf Course, February 2018), and replacing it with another use would eliminate the only public golf course in Alhambra.

**c. No Linear Park Over Railway Trench**

Some members of the public suggested during the EIR scoping process that the Plan should not include policies to construct a linear park over the existing railway trench along Mission Road, citing concerns that this facility would expose its users to safety hazards or localized air quality impacts from their proximity to trains. No such potential impacts have been identified in this EIR, however. The linear park would be located above, and completely separated from, the railroad right-of-way, so no safety hazards would result from potential interaction between park users and trains. Additionally, there is no evidence that localized impacts currently exist from train operations in this area (which would not increase as a result of this proposal), or that the “tunnel” created by building this park over the tracks could not be vented in a way that would avoid exposing people to significant localized pollutant concentrations. This alternative would therefore not avoid or substantially lessen any significant effects of the proposed project. In response to community input, the linear park has been removed from the Plan.

**d. Alternatives for Alleviating Traffic Congestion**

Some members of the public suggested alternative ideas for alleviating traffic congestion impacts during the EIR scoping process. These ideas included the following:

- More high-frequency transit to Cal State LA and South Pasadena
- Giving up street lane space (road diet) for bikeways

While creating more high-frequency transit connections to Cal State LA and South Pasadena could benefit public transit riders, there is no evidence that this alternative would avoid or substantially lessen any significant effects of the proposed project. Giving up street lane space for bikeways could encourage bicycling, which might incrementally reduce car trips if some of these bicycle trips were previously taken by car, but it would also reduce capacity for automobiles on these streets, which could increase traffic congestion at intersections with significant congestion impacts, increasing the severity of those impacts. There is no evidence that this alternative would avoid or substantially lessen any significant effects of the proposed project.
7 References

7.1 Bibliography


____. 2018b. California Statutes and Regulations for the Division of Oil, Gas, and Geothermal Resources. January 2018. Available at: 

http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1/.


____. 2017. *Los Angeles County Fire Hazard Severity Map*. [map]. Available at: 
http://www.fire.ca.gov/fire_prevention/fhsz_maps_losangeles.

____. 2018. *What is CAL FIRE?* September 2018. Available at: 
http://calfire.ca.gov/communications/downloads/fact_sheets/WhatisCALFIRE.pdf.


California Department of Toxic Substances Control (DTSC). 2017. “EnviroStor: Hazardous Waste and Substances Site List.” Available at: 

City of Alhambra
Alhambra General Plan


____. 2017. “GeoTracker.” [Online Database].


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City of Alhambra

Alhambra General Plan


___. 2017d. “San Jose Creek Water Reclamation Plant.”

___. 2017e. “Whittier Narrows Reclamation Plant.”

___. 2017e. “Southeast Resource Recovery Facility (SERRF) Brochure.”

South Coast Air Quality Management District (SCAQMD). 2003.


City of Alhambra
Alhambra General Plan


7.2 List of Preparers

**Rincon Consultants, Inc.**

Joe Power, AICP CEP, Principal/Vice President  
Greg Martin, Project Manager  
Lexi Journey, Project Manager  
Christy Sabdo, Senior Environmental Project Manager  
Chris Williamson, Supervising Planner  
Abagale Taylor, Associate Planner  
Lance Park, Associate Planner  
Ben Welsh, Associate Environmental Planner  
Vanessa Villanueva, Associate Environmental Planner  
Smadar Levy, Associate Environmental Planner  
Allysen Valencia, GIS Analyst  
Jon Montgomery, GIS Analyst  
Chris Thomas, CAD Drafter/Graphics Technician  
April Durham, PhD, Senior Technical Editor  
Chris Jackson, Technical Editor  
Debra Jane Seltzer, Document Production Specialist
8 Responses to Comments on the Draft EIR

This section includes comments received during the circulation of the Draft Environmental Impact Report prepared for the Alhambra General Plan.

The Draft EIR was circulated for a 60-day public review period that began on August 3, 2018 and ended on October 3, 2018. The City of Alhambra received 17 letters that included comments on the Draft EIR. The commenters and the page number on which each commenter’s letter appear are listed below.

<table>
<thead>
<tr>
<th>Letter No. and Commenter</th>
<th>Page No.</th>
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<tbody>
<tr>
<td>1 Scott Morgan, Director, State Clearinghouse</td>
<td>316</td>
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<tr>
<td>2 Miya Edmonson, IGR/CEQA Branch Chief, Department of Transportation</td>
<td>319</td>
</tr>
<tr>
<td>3 J.S. Mason, SSM III, Commander, Department of California Highway Patrol</td>
<td>321</td>
</tr>
<tr>
<td>4 S. Suarez, Commander, Department of California Highway Patrol</td>
<td>323</td>
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<tr>
<td>5 Daniel Garcia, Program Supervisor, South Coast AQMD</td>
<td>325</td>
</tr>
<tr>
<td>6 Adriana Raza, Customer Service Specialist, County Sanitation Districts of Los Angeles County</td>
<td>335</td>
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<tr>
<td>7 Ron Sahu, Alhambra resident</td>
<td>339</td>
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<tr>
<td>8 Jason Chan, Alhambra Hills resident</td>
<td>342</td>
</tr>
<tr>
<td>9 Dr. Tom Wilson, Senior Advisor, CCSC</td>
<td>347</td>
</tr>
<tr>
<td>10 Cliff Bender, Alhambra resident</td>
<td>371</td>
</tr>
<tr>
<td>11 Melissa Michelson, Alhambra resident</td>
<td>381</td>
</tr>
<tr>
<td>12 Joyce Amaro, President, Alhambra Preservation Group</td>
<td>389</td>
</tr>
<tr>
<td>13 Erica Sunada, Alhambra resident</td>
<td>411</td>
</tr>
<tr>
<td>14 Bernice Ortega, Alhambra resident</td>
<td>414</td>
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<td>15 Christine Olson, Alhambra resident</td>
<td>416</td>
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<td>16 Jose Aguayo, President, Grassroots Alhambra</td>
<td>419</td>
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<tr>
<td>17 Georgia Sheridan, AICP, Senior Manager, Los Angeles County Metropolitan Transit Authority</td>
<td>440</td>
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</tbody>
</table>

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).
Letter 1

STATE OF CALIFORNIA
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

EDMUND G. BROWN JR.
GOVERNOR

KEN AXE
DIRECTOR

September 18, 2018

Vanessa Reynoso
City of Alhambra
111 S. First Street
Alhambra, CA 91803

Subject: City of Alhambra General Plan
SCH#: 2017051085

Dear Vanessa Reynoso:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 17, 2018, and the comments from the responding agency (ies) are (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(e) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency
Document Details Report  
State Clearinghouse Data Base

<table>
<thead>
<tr>
<th>SCH#</th>
<th>2017051085</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Title</td>
<td>City of Alhambra General Plan</td>
</tr>
<tr>
<td>Lead Agency</td>
<td>Alhambra, City of</td>
</tr>
<tr>
<td>Type</td>
<td>EIR Draft EIR</td>
</tr>
<tr>
<td>Description</td>
<td>The Alhambra GP, Vision 2040 - A community mosaic is a comprehensive update of the city's GP, and provides a vision for the future of Alhambra over the next 20+ years. The city part of the city's current GP that is not being updated is the city's 2013-2021 housing element. The proposed project would involve adoption of a new GP, including a revised GP land use map. The GP does not envision major land use changes and is not anticipated to facilitate growth beyond what could occur under the current GP. The GP update does, however, envision certain land use and community design changes along key transportation/commercial corridors while maintaining the character of many of the residential areas of the city.</td>
</tr>
</tbody>
</table>

| Lead Agency Contact | Name: Vanessa Reynoso |
|                     | Agency: City of Alhambra |
|                     | Phone: (626) 570-5033 |
|                     | Email: generalplan@cityofalhambra.org |
|                     | Address: 111 S. First Street, Alhambra, CA 91803 |

| Project Location | County: Los Angeles |
|                 | City: Alhambra |
|                 | Region:                |
|                 | Lat / Long: 34° 05' 22" N / 118° 07' 37" W |
| Cross Streets   | First St. and Bay St. |
| Parcel No.      | Township:                |
|                 | Range: Range Section Base |
|                 |  |  |  |
| Proximity to:   | Highways: 1-10, 710, 210, SR 110 |
|                 | Airports:               |
|                 | Railways: UPRR |
|                 | Waterways: San Pasqual Wash, Laguna Channel, Alhambra Wash |
|                 | Schools: All schools within city |
| Land Use        | Agricultural Land; Forest Land/Fire Hazard; Air Quality; Biological Resources; Archaeologic-Historic; Geologic/Sediment; Water Quality; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Traffic/Circulation; Aesthetic/Visual; Cumulative Effects; Drainage/Absorption; Economic/Jobs; Flood Plain/Flooding; Growth Including; Septic System; Sewer Capacity; Social; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Water Supply; Wetlands/ Riparian |

| Reviewing Agencies | Resources Agency; State Water Resources Control Board; Division of Drinking Water; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; California Energy Commission; Public Utilities Commission; San Gabriel & Lower Los Angeles Rivers & Mountains Conservancy; Office of Emergency Services, California; Department of Conservation; Department of Fish and Wildlife, Region 5; Cal Fire; Department of Parks and Recreation; California Highway Patrol; Caltrans, District 7 |

| Date Received | 08/02/2018 |
| Start of Review | 08/02/2018 |
| End of Review | 09/17/2018 |
8.1 Letter 1

COMMENTER: Scott Morgan, Director, State Clearinghouse

DATE: September 18, 2018

The commenter states that the State Clearinghouse submitted the Draft EIR to applicable state agencies and acknowledges that the City has complied with CEQA environmental review requirements. The State Clearinghouse Letter attaches forwarded letters from Caltrans and the Department of California Highway Patrol. These letters are addressed individually as Letters 2, 3, and 4. No response is warranted.
September 17, 2018

Community Development Department
Att: Vanessa Reynoso, Deputy Director of Community Development
City of Alhambra
111 S. First Street
Alhambra, CA 91801

Re: Alhambra General Plan, Vision
2040 - A Community Mosaic
SCH# 2017051085
GTS# 07-LA-2018-01800TD-DEIR

Dear Ms. Reynoso:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project includes a comprehensive update to the City’s General Plan and provides a vision for the future of Alhambra over the next 20+ years.

Caltrans has reviewed the Draft Environmental Impact Report and has the following comment:

- Caltrans has confirmed that the above referenced project will have a substantial cumulative impact at the seven ramp locations listed in Table 40. Caltrans may accept fair share funding contributions towards future improvements of its facilities so long as we can show that such improvements are reasonably expected to be implemented in a reasonable time frame. Please contact Caltrans to explore and develop these reasonable measures and plan.

Caltrans will work with the Lead Agency to evaluate traffic impacts, identify potential improvements, and establish a funding mechanism that helps mitigate cumulative transportation impacts in the project vicinity.

Please keep in mind, an encroachment permit will be required for any project work proposed on or near the Caltrans Right of Way and all environmental concerns must be adequately addressed.

In the spirit of cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. If you have any questions regarding these comments, please contact project coordinator Mr. Todd Davis, at (213) 897-0067 and refer to GTS# 07-LA-2018-01800TD.

Sincerely,

MIYA EDMONSON
Director, CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

"Provide a safe, modern, integrated and efficient transportation system to enhance California’s economy and livability."
8.2 Letter 2

COMMENTER: Miya Edmonson, IGR/CEQA Branch Chief, California Department of Transportation

DATE: September 17, 2018

Response 2.1

The commenter confirms that growth under the General Plan would make a substantial contribution to significant traffic impacts at several ramp locations, indicates that fair share funding may be acceptable, and notes that Caltrans will work with the City to evaluate impacts of future projects and identify needed improvements and funding mechanisms.

The agreement with the Draft EIR conclusions regarding impacts to ramp locations is noted. Although such impacts are largely due to regional growth, forecast growth in Alhambra would contribute to the degradation of service levels on Caltrans facilities. Draft EIR Mitigation Measure T-2 identifies fair share funding as a mitigation measure for such impacts, but the Draft EIR acknowledges that because implementation of needed improvements cannot be assured, the impact of the General Plan would be unavoidably significant. The City will continue to evaluate the impacts of projects on a case-by-case basis and to work with Caltrans to identify solutions for identified significant impacts and develop appropriate funding mechanisms.

Response 2.2

The commenter notes that an encroachment permit would be needed for construction work in Caltrans rights-of-way and indicates that Caltrans staff is available to work with City as needed.

Encroachment permits will be obtained as necessary for individual construction projects. The City will continue to work with Caltrans to identify solutions to local and regional transportation issues.
MEMORANDUM

Date: August 22, 2018

To: East Los Angeles Area (535)

From: DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
Special Projects Section


Subject: ENVIRONMENTAL DOCUMENT REVIEW AND RESPONSE
SCH# 20170581085

Special Projects Section (SPS) recently received the referenced “Notice of Completion” environmental impact document from the State Clearinghouse (SCH).

Due to the project’s geographical proximity to the East Los Angeles Area, please use the attached checklist to assess its potential impact to local area operations and public safety. If it is determined that departmental input is advisable, your written comments referencing the above SCH number must be mailed to the State Clearinghouse at 1400 Tenth Street, Room 121, Sacramento, CA 95814. Your written comments must be received by SPS no later than September 17, 2018. If the due date to SPS cannot be met, please send comments directly to the lead agency (refer to the Notice of Completion) no later than three working days after the original due date - by September 20, 2018. For reference, additional information can be found in General Order 41.2, Environmental Impact Documents.

For project tracking purposes, SPS must be notified of East Los Angeles Area’s assessment of the project (including negative reports). Please e-mail a copy of Area’s response to Associate Governmental Program Analyst Leah Mora at LeahMora@chp.ca.gov. For questions or concerns, please contact Mrs. Mora at (916) 843-3382.

J. S. MASON, SSM III
Commander

Attachments: Checklist
Project File

cc: Southern Division
8.3  Letter 3

COMMENTER:  J.S. Mason, SSM III, Commander, Department of California Highway Patrol

DATE:       August 22, 2018

The commenter directs the Highway Patrol’s East Los Angeles Area Office to provide comments on the Draft EIR.

The East Los Angeles Area Office’s comments are included in Letter 4.
City of Alhambra
Alhambra General Plan

Letter 4

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
1601 Corporate Center Drive
Monterey Park, CA 91754
(323) 980-4600
(800) 735-2928 (TT/TDD)
(800) 735-2922 (Voice)

August 27, 2018

File No.: 535.14652.16521

State Clearing House
1400 Teichert Street, Room 121
Sacramento, CA 95814

The East Los Angeles Area Office of the California Highway Patrol received the “Notice of Completion” of the Environmental Document for the City of Alhambra General Plan, State Clearing House (SCH) #2017051085. After our review, we have concerns with the potential impact this project could have on traffic congestion.

As documented in the Environmental Impact Report (EIR) prepared by the City of Alhambra, the proposed project would significantly impact traffic on the I-10 freeway. This includes the mainline of the I-10 Freeway and on and off ramps of the I-10 Freeway within the area of the proposed project. The increased traffic congestion would have significant impact on our Area’s operations. The increased volume of traffic would negatively affect our Area’s response times, increase calls for service and create a potential for increased traffic collisions. The increase in traffic congestion would significantly affect public safety. As noted in the EIR, the proposed project’s impact to the I-10 is “significant and unavoidable.” The Area has recently seen an increase in traffic back-up on the I-10 mainline at off ramps located within the city of Alhambra. The proposed project would only continue to increase traffic congestion at these locations.

If you have any questions regarding these concerns, please contact Lieutenant D. Moulton at (323) 980-4600.

Sincerely,

S. SUAREZ, Captain
Commander

Cc: Southern Division
Special Projects Section

Safety, Service, and Security
An Internationally Accredited Agency
8.4 Letter 4

COMMENTER: S. Suarez, Captain, Department of California Highway Patrol

DATE: August 27, 2018

The commenter indicates that traffic increases under the General Plan would have a significant impact on Highway Patrol operations, noting that the Draft EIR identifies impacts along the I-10 corridor as significant and unavoidable.

The commenter is correct that the Draft EIR identifies traffic impacts as significant and unavoidable. The City will continue to take steps to address traffic congestion in and around Alhambra, but outside of a growth moratorium, cannot fully avoid the impact of increased traffic. The potential impact to response times and service calls is noted and important considerations for City decision makers, but it should be recognized that changes in response times are not “environmental” impacts under CEQA unless such changes result in physical effects to the environment (e.g., by requiring the construction of a new or expanded police protection facility, the construction of which may have significant environmental effects). As such, the Draft EIR focuses primarily on the environmental impacts of providing police protection service rather than impacts to service.
Letter 5

South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

September 20, 2018

Vanessa Reynoso, Deputy Director of Community Development
City of Alhambra
111 S. First Street
Alhambra, CA 91801

Draft Environmental Impact Report (Draft EIR) for the Proposed
City of Alhambra Draft General Plan, Vidon 2040 – A Community Mosaic

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final EIR.

SCAQMD Staff’s Summary of Project Description
The lead agency proposes the adoption of a draft general plan for the City of Alhambra, consisting of a comprehensive update of the City’s current General Plan, and a vision for the future of Alhambra over the next 20 years (proposed project). The City of Alhambra is a built-out community totaling 4,899 acres, or 7.6 square miles. The proposed project covers the City of Alhambra, which encompasses approximately 4,899 acres, or 7.6 square miles, and intersects the Interstate-10 (I-10) and Interstate-710 (I-710) freeways.

SCAQMD Staff’s Summary of Air Quality Analysis
Based on a review of the air quality section of the draft EIR, SCAQMD staff found that the lead agency did not quantify regional and localized impacts resulting from construction and operation of the proposed project. The lead agency estimated the proposed project’s construction and operational emissions using CalEEMod and included the CalEEMod output file in Appendix D, but not within the Draft EIR. Therefore, SCAQMD staff recommends the lead agency include a discussion of these quantified emissions estimates within the air quality section of the draft EIR.

Further, the lead agency states that impacts to air quality are less than significant and no mitigation is required. However, the CalEEMod output file in Appendix D demonstrates that the proposed project’s operational emissions would be 70.43 lb/day, which exceeds SCAQMD’s CEQA significance threshold for operational emissions of 55 lb/day. Upon review of the CalEEMod output file in Appendix D, SCAQMD staff found that the proposed project’s mitigated operational emissions would be significant absent additional mitigation measures.

Although the lead agency did not conduct a localized significance threshold (LST) analysis or a BIA analysis, the lead agency concluded that the proposed project would not expose sensitive receptors to substantial pollutant concentrations or diesel particulate matter (DPM). SCAQMD is concerned with this determination without the lead agency providing more substantive evidence. SCAQMD staff also recommends the lead agency adopt and implement additional mitigation measures provided in the attachment.

General Comments
SCAQMD staff has reviewed the air quality analysis in the draft EIR and has detailed comments on the methodology. Please see the enclosed attachment for more information. Additionally, as described in the

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1 Notice of Availability of a Draft EIR. Project Description
2 Draft EIR, Page 77- Page 84
2016 AQMP, to achieve NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. The proposed project plays an important role in contributing to NOx emissions during operation. Therefore, SCAQMD staff recommends the lead agency adopt additional mitigation measures to further reduce NOx emissions as well as ROG, PM10, and PM2.5 emissions.

SCAQMD’s 2016 Air Quality Management Plan
On March 3, 2017, the SCAQMD’s Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin (Basin). The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

Closing
Pursuant to California Public Resources Code Section 21092.5(e) and CEQA Guidelines Section 15068(b), SCAQMD staff requests that the lead agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15068(c)). Further, when the lead agency makes the finding that the recommended mitigation measures are not feasible, the lead agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist, CEQA- IGR Section, at (909) 398-2139 if you have any questions regarding the enclosed comments.

Sincerely,

[Signature]
Daniel Garcia
Program Supervisor
Planning, Rule Development & Area Sources

Attachment
DORD
LACT18081-05
Clocked Number

ATTACHMENT

Air Quality Analysis – Interim Milestone Years
1. The draft EIR analyzed operational year 2040 for the air quality analysis, however, it is not clear that year 2040 represents the proposed project’s peak operational emissions. For example, higher emission rates from vehicles, trucks, and equipment in earlier years may result in higher peak daily emissions in early phases of the proposed project. Emission rates of vehicles, trucks, and equipment are generally higher in earlier years as more stringent emission standards and technologies have not been fully implemented, and fleets have not fully turned over. Therefore, SCAQMD staff recommends that the lead agency include interim milestone years (i.e., year 2020, year 2025, and year 2030) in the air quality analysis to ensure the peak daily emissions are identified and adequately disclosed in the Final EIR. The interim milestone years will also help demonstrate progress over time from implementing air-quality-related mitigation measures and policies included in the Draft EIR.

Air Quality Analysis – Overlapping Construction and Operational Impacts
2. Based on a review of the air quality analysis, SCAQMD staff found that the lead agency did not analyze construction activity overlapping with operational activity. Since the proposed project is expected to occur over a multi-year timeframe of 21 years from 2019 to 2040, an overlapping construction and operation scenario is reasonably foreseeable, unless the proposed project includes requirement(s) that will prohibit overlapping construction and operational activities. To properly analyze a worst-case scenario that is reasonably foreseeable at the time the draft EIR is prepared, SCAQMD staff recommends that the lead agency revise the air quality analysis to identify the overlapping years by combining construction emissions (including emissions from demolitions) with operational emissions, and compare the combined emissions to SCAQMD’s air quality CEQA operational thresholds of significance to determine the level of significance in the final EIR. If upon revising the air quality analysis the lead agency determines that the proposed project’s air quality impacts would be significant, mitigation measures will be required pursuant to CEQA Guidelines Section 15126.4. For more information on suggested potential mitigation measures as guidance to the lead agency, please see Comment No. 5 below and visit SCAQMD’s CEQA Air Quality Handbook website.5

Air Quality Analysis – Localized Significance Thresholds (LST) Analysis
3. When specific development is reasonably foreseeable as a result of the goals, policies, and elements in the proposed project, the lead agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in a CEQA document. SCAQMD staff is concerned with this analysis. Please see detailed comments below.

Localized Significance Thresholds Analysis

To analyze and disclose a worst-case scenario that is reasonably foreseeable at the time the draft EIR is prepared, SCAQMD staff recommends that the lead agency use its best efforts, based on available project information (e.g., building dates, area, building footprints or sizes) to quantify the proposed project’s localized emissions and disclose the localized air quality impacts in the final EIR. SCAQMD guidance for performing a localized air quality analysis is available on the SCAQMD website.6 Alternatively, the lead agency should consider including a new air quality mitigation measure to require a project-level LST analysis prior to issuance of a grading permit as follows:

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5 Ibid.
Prior to the issuance of a grading permit for new development projects, the applicant/developer shall utilize the SCAQMD’s Localized Screening Thresholds (LST) methodology to analyze the localized air quality impacts to sensitive receptors resulting from the proposed project. If the analysis shows that emissions would exceed SCAQMD’s air quality criteria localized thresholds for the emissions, the maximum daily grading activities of the proposed project shall be limited to the extent that would occur without resulting in violations in excess of SCAQMD’s significance thresholds for those emissions.

This mitigation measure ensures that the lead agency has adequately analyzed the proposed project’s localized air quality impacts to justify deferring the LST analysis, that a project- or site-specific LSTs analysis will be completed in a later stage, and that any nearby sensitive receptors are not adversely affected by the proposed project’s construction activities that are occurring in close proximity.

Health Risk Assessment (HRA) Analysis for Sensitive Receptors Near I-10 or I-710 Freeways

4. To facilitate the purpose and goal of CEQA on public disclosure, SCAQMD staff recommends that the lead agency use applicable project information that is available in the draft EIR to conduct a HRA analysis and to disclose the potential health risks in the final EIR. Additionally, it is recommended that the lead agency implement a project-design feature prohibiting the siting of new sensitive receptors near I-10 and I-710, or implement a mitigation measure requiring project-level HRAs to be conducted prior to the approval of projects near I-10 or I-710. This ensures that the lead agency adequately considers the proposed project’s health impacts. Further, the lead agency should include a discussion regarding mitigation if a project-level HRA is found to exceed the SCAQMD’s HRA thresholds.

Additional Considerations for Sensitive Receptors

a) The lead agency should also consider requiring the use of enhanced filtration systems with maximum efficiency rating value (MERV) of 13 or better in residential units within 500 feet of I-10 and I-710 to ensure the maximum reduction of health risks from exposures to diesel particulate matter (DPM) emissions from vehicles and trucks traveling on the freeway.

b) If enhanced filtration systems are installed, it is important to consider the limitations. In a study that SCAQMD conducted to investigate filters,9 a cost burden is expected to be within the range of $120 to $240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail and disclosed to prospective residents prior to assuming that they will sufficiently alleviate exposures to DPM emissions.

c) SCAQMD staff recommends that the lead agency make the following disclosures to prospective residents and include them as requirements in the final EIR.

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City of Alhambra
Alhambra General Plan

Vanessa Reynolds  September 20, 2018

- Disclosure on potential health impacts to prospective residents from living in proximity to freeways and the reduced effectiveness of air filtration system when windows are open;
- Recommended schedules (e.g., once a year or every six months) for replacing the enhanced filtration units;
- Ongoing cost sharing strategies, if any, for replacing the enhanced filtration units;
- Identification of the responsible implementing and enforcement agency such as the lead agency for ensuring that enhanced filters are installed at residential units before a permit of occupancy is issued;
- Identification of the responsible entity such as Homeowners Association or property management for ensuring filters are replaced on time, if appropriate and feasible;
- Criteria for assessing progress in installing and replacing the enhanced filtration units; and
- Process for evaluating the effectiveness of the enhanced filtration units at the proposed project.

Additional Guidance for Siting Sensitive Receptors

a) SCAQMD staff recognizes that there are many factors lead agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between lead agencies and SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance document provides recommended policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. Therefore, it is recommended that the lead agency review this guidance document in addition to the California Air Resources Board’s Guidance document, Air Quality and Land Use Handbook: A Community Health Perspective, prior to approving the proposed project.

Additional Recommended Mitigation Measures

5. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. SCAQMD staff recommends that the lead agency incorporate the following mitigation measures in the Final EIR to further reduce emissions, particularly from NOx, N0x, and particulate matter. Additional information on potential mitigation measures as guidance to the lead agency is available on the SCAQMD CEQA Air Quality Handbook website.

a) Require all off-road diesel-powered construction equipment meet or exceed Tier 4 off-road emissions standards. A copy of the fleet’s tier compliance documentation, and CARB or SCAQMD operating permit shall be provided to the lead agency at the time of mobilization of each applicable unit of equipment. In the event that all construction equipment cannot meet the Tier 4 engine certification, the lead agency must demonstrate through future study with written findings supported by substantial evidence before using other technologies/strategies. Alternative strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the proposed project, and/or limiting the number of individual construction project phases occurring simultaneously. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provision of written documents by contractors to prove and ensure compliance.

b) Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction.

and if the lead agency determines that 2010 model year or newer diesel haul trucks are not feasible, the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provision of written documents by contractors to prove and ensure compliance.

c) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.

d) Limit parking supply and unbundle parking costs.

e) Maximize the planting of trees in landscaping and parking lots.

f) Use light colored paving and roofing materials.

g) Install light colored "cool" roofs and cool pavements.

h) Require use of electric or alternatively fueled sweepers with HEPA filters.

i) Require use of electric lawn mowers and leaf blowers.

j) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

k) Use of water-based or low VOC cleaning products.

To further reduce particulate matter from the proposed project, SCAQMD staff recommends that the lead agency include the following mitigation measures in the Final EIR.

a) Suspend all soil disturbance activities when winds exceed 25 mph as instantaneous gusts or when visible plumes emanate from the site and stabilize all disturbed areas.

b) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

c) Sweep all streets at least once a day using SCAQMD Rule 1186.1 certified street sweepers or roadway sweeping trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).

d) Apply water three times daily or non-toxic soil stabilizers according to manufacturers’ specifications to all unpaved parking or staging areas, unpaved road surfaces, or to areas where soil is disturbed. Reclaimed water should be used.
8.5 Letter 5

COMMENTER: Daniel Garcia, Program Supervisor, South Coast Air Quality Management District

DATE: September 20, 2018

Response 5.1
The commenter correctly summarizes the project that is the subject of the Draft EIR. No response is warranted.

Response 5.2
The comment summarizes the air quality analysis and suggests that the emissions included in Appendix D be summarized in the air quality section of the EIR. The commenter also notes that potential emissions exceed SCAQMD significance thresholds and states a concern about the Draft EIR finding regarding exposure of sensitive receptors to substantial pollutant concentrations or diesel particulate matter.

The CalEEMod worksheets included in Appendix D show overall air pollutant emissions associated with growth forecast under the draft General Plan. However, comparison of the citywide emissions to the SCAQMD’s project-level thresholds would serve no analytic purpose and, with no point of reference, the emissions estimates would not provide useful information to decision makers or the public. The calculations were done primarily in support of the greenhouse gas analysis since that analysis estimates per capita emissions to applicable per capita emission targets.

It is important to note that the Draft EIR is a Program EIR that is aimed at analyzing the broad, citywide impacts of General Plan implementation rather than the specific impacts of any individual future development that may be carried out under the guise of the General Plan. The finding of a less than significant impact with respect to regional air quality is based on the General Plan’s consistency with the Air Quality Management Plan while the finding of a less than significant impact with respect to localized pollutant concentrations and DPM exposure relies on policies contained in the General Plan aimed at evaluated and, as necessary, addressing such issues for individual projects as those projects are carried out.

The finding of a less than significant impact at the programmatic level does not necessarily mean that individual development projects in the City will not have project-specific significant effects. As required by CEQA, individual developments will continue to be evaluated on a case-by-case basis. Projects that are found not to have significant project-level impacts may be exempt from further CEQA review, but projects that may or would have significant project-level impacts would require a project-level environmental review under CEQA.

Response 5.3
The commenter notes that detailed comments regarding the methodology are provided and recommends adopting additional mitigation for NOx.

The comments regarding the analysis methodology are addressed in responses 5.6 through 5.10. With respect to NOx mitigation, the project being analyzed in the Draft EIR is a General Plan, not a specific development project. The General Plan is a policy document that provides overall guidance to City decision makers and the public. Adoption of the General Plan would not directly generate
any air pollutant emissions. As discussed further in Response 5.10, the General Plan includes a number of policies aimed generally at reducing air pollutant emissions, including NOx. However, mitigation is not warranted at this time given that the Draft EIR concludes that the General Plan’s regional air quality impact would not be significant at a programmatic level. Also, see Response 5.2.

Response 5.4
The commenter describes the 2016 Air Quality Management Plan and notes that a reduction in NOx emissions is a significant challenge in the South Coast Air Basin.

This comment is acknowledged. The draft General Plan includes various policies aimed at reducing emissions from both mobile and stationary sources through energy conservation, use of renewable energy sources, and reduction in per capita vehicle miles traveled. The City will continue to work cooperatively with the SCAQMD and other agencies to reduce emissions to the maximum degree feasible.

Response 5.5
The commenter requests receipt of responses to comments prior to EIR certification and describes the requirements for responses.

City staff is aware of CEQA’s requirements with respect to responding to comments and mitigation. Please see responses 5.1 through 5.4 and 5.6 through 5.10. Responses to all agency comments will be provided in advance of EIR certification.

Response 5.6
The commenter recommends analysis of interim years rather than focusing on the General Plan horizon year of 2040.

While the commenter is correct that emission rates are expected to decline over the life of the General Plan, the suggestion to calculate emissions during interim years as suggested would not provide any meaningful information for decision makers or the public. Emissions estimates are provided for informational purposes only since the analysis correctly does not attempt to relate emissions associated with citywide buildout to SCAQMD thresholds for individual development projects. Rather, the analysis compares growth forecasts under the General Plan to growth forecasts in the Air Quality Management Plan to determine significance and, as noted in Section 4.2, the General Plan would not accommodate growth beyond that forecast in the Air Quality Management Plan. Finally, contrary to what the commenter suggests, any interim year analysis would assuredly find lower overall emissions than were calculated for the 2040 horizon year because the amount of new development at any interim year would be a subset of the overall amount of new development in 2040.

Response 5.7
The commenter suggests that the Draft EIR should analyze the effects of overlapping construction and operational emissions.

As discussed in Response 5.2, the project analyzed in the Draft EIR is a citywide General Plan, not a specific development project. Of course, construction will occur over the 20+ year life of the General Plan and such construction activity will overlap with the operation of existing and future developments. However, no specific development project is proposed at this time so meaningful
quantification of the construction or operational emissions as suggested by the commenter would not only infeasible, but potentially misleading insofar as it would suggest a level of knowledge about the nature, size, and locations of individual developments that is not known at this time. Again, the current document is a programmatic review of the General Plan. The analysis suggested by the commenter would be more appropriate, and will be conducted by the City as necessary, on as part of project-level CEQA reviews of individual development projects.

**Response 5.8**

The commenter suggests conducting a local significance threshold (LST) analysis or requiring such an analysis as part of a mitigation measure.

As discussed in Response 5.2, the proposed project is a citywide General Plan, not a specific development project. Therefore, project-specific information that would be needed for an LST analysis is not available. Individual projects in Alhambra will continue to undergo project-level CEQA review and the City will continue to adhere to SCAQMD recommended methodologies for such analysis, including the LST methodology. Again, the fact that the General Plan has been found to have a less than significant impact at a programmatic level does not mean that individual development projects in the City will not have significant project-level impacts. Each project will be evaluated at the time it is proposed and, if significant project-level impacts are identified, appropriate mitigation will be considered. In response to this comment, the following policy has been added to the Resources chapter of the draft General Plan:

- **Policy R-4C**  
  Use South Coast Air Quality Management District recommended methodologies and mitigation strategies as appropriate to analyze and reduce the air quality impacts of individual development projects.

**Response 5.9**

The commenter suggests that the Draft EIR should include a health risk analysis (HRA), include a requirement for HRAs for projects near freeways, and include mitigation in the form of enhanced filtration for projects found to have significant health risks. The commenter also suggests that the City review SCAQMD’s *Guidance Document for Addressing Air Quality Issue in General Plans and Local Planning*.

This issue is discussed in Section 4.2 of the Draft EIR, under Impact AQ-3. Because no specific project is being contemplated at this time, project-specific parameters are not available and preparation of an HRA would not be appropriate or useful. Consequently, the Draft EIR considers the ARB’s recommended buffers between sensitive land uses and generators of toxic air contaminants. Although the General Plan could potentially accommodate sensitive land uses in proximity to toxic air contaminant generators, no new residential development is anticipated within 500 feet of the 10 or 710 Freeways. In addition, General Plan Policy R-4B states that, through land use decisions, the City will minimize to the degree feasible the generation of air pollution and exposure of sensitive populations to elevated air pollutant concentrations. Implementation Action R3 implements this policy by requiring health risks assessments and, as necessary, mitigation for sensitive land uses proposed near generators of toxic air contaminants (as listed in Table 12 of the draft General Plan). Mitigation may take the form of the filtration systems mentioned by the commenter, but given that the life of the General Plan is more than 20 years and the specific impacts associated with individual development projects are not known at this time, it would not be appropriate to prescribe the specific mitigation requirements for any individual project as part of the current Program EIR, particularly given that technologies in this area are rapidly changing. Rather, that determination will
need to be made on a case-by-case depending and would depend on the type and location of the project and the type and level of health risk exposure anticipated.

The referenced SCAQMD document was considered during the draft General Plan and Draft EIR preparation. Many of the suggested goals, policies, and analytical approaches in that document are more specific than is appropriate for the General Plan, which covers a wide array of issues and is intended to be a general policy guide for the City. In response to this letter, however, a new policy to follow SCAQMD guidance in the analysis and mitigation of air quality impacts for individual development projects in the City (see Response 5.8).

**Response 5.10**

The commenter recommends a range of mitigation measures related to energy conservation, use of low VOC products, and dust control.

The measures included in the commenter’s letter are project-specific measures that may be implemented as appropriate on a case-by-case basis for individual development projects in Alhambra. However, the proposed project is a citywide General Plan, a policy document that sets general goals and policies for the City. The Resources chapter of the draft General Plan include a number of policies aimed at reducing energy use and air pollutant emissions generally and, as discussed in Response 5.2, based on implementation of these policies and the fact that the General Plan is consistent with the growth forecasts upon which the Air Quality Management Plan is based, the Draft EIR concludes that the General Plan would not result in a significant air quality impact at a programmatic level. Thus, the project-specific measures suggested by the commenter are not necessary or even appropriate for the General Plan. Again, this does not mean that individual development projects necessarily will not have significant air quality impacts at a project-specific level and the suggested measures or others will be considered as part of future CEQA reviews for individual projects that would have significant impacts. The applicability of individual measures will depend on the specific characteristics and impacts of individual projects.
Ms. Vanessa Reynoso, Deputy Director
of Community Development
City of Alhambra
111 South First Street
Alhambra, CA 91801

Dear Ms. Reynoso:

DEIR Response to
Alhambra General Plan, Vision 2040 – A Community Mosaic

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report and Draft General Plan (DEIR) for the subject project on August 2, 2015. The City of Alhambra (City) is located within the jurisdictional boundaries of Districts Nos. 2 and 16. We offer the following comments:

1. Table 1 Summary of Impacts, Mitigation Measures, and Significance after Mitigation, page 12; Impact U-2 – Implementation of the Plan forecasts an increase wastewater generation of 1,042,541 gallons per day and states impacts would be less than significant. The Districts should review individual developments within the City in order to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts’ facilities will be affected by the project.

2. Impact HW Q-1, page 166, second paragraph – The wastewater generated by the City is treated at one or more of the following: the Whittier Narrows Water Reclamation Plant (WRP) located near the City of South El Monte, which has a capacity of 15 mgd and currently produces an average recycled water flow of 7.1 million gallons per day (mgd); the Los Coyotes WRP located in the City of Carson, which has a capacity of 37.5 mgd and currently produces an average recycled water flow of 20.6 mgd; or the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently produces an average flow of 252.7 mgd.

3. DMM No. 7, page 269, b, Wastewater – As specified in the introductory paragraph of this letter, the City is located within the jurisdictional boundaries of Districts Nos. 2 and 16.

4. Impact U-4, page 285, paragraphs 1 and 2 – Development facilitated by the Plan would add an estimated 360 single-family residential units, 2,040 multi-family residential units, 325,000 square feet of retail/restaurant space, 4.2 acres of automobile dealership space, 480,000 square feet of office space, 571 employees in industrial (business park) space, and 250 hotel rooms. It should be noted the Districts are empowered by the California Health and Safety Code to charge a fee for
Ms. Vanessa Reynoso

-2-

September 18, 2018

the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. In determining the impact to the Sewerage System and if connection fees are applicable, the Districts' Chief Engineer and General Manager will determine the user category (e.g., Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. If a connection fee is applicable, payment will be required before a permit to connect to the sewer is issued. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. For more information and a copy of the Connection Fee Information Sheet, go to www.lscwd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link.

5. All other information concerning Districts' facilities and sewerage service contained in the document is current.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR

DCC-103140.D0010

Final Environmental Impact Report
8.6 Letter 6

COMMENTER: Adriana Raza, Customer Service Specialist, County Sanitation Districts of Los Angeles County

DATE: September 18, 2018

Response 6.1

The commenter notes the forecast increase in wastewater generation and indicates that the Districts will need to review individual developments in the City.

This comment is acknowledged. Individual developments in the City will be subject to project-level CEQA review and the Districts will be consulted at that time, as deemed appropriate.

Response 6.2

The commenter provides minor corrections/clarifications regarding the Districts’ treatment facilities.

In response to this comment, the second full paragraph on page 166 of the Draft EIR is revised to read as follows:

In addition to stormwater runoff, polluted wastewater could be discharged by development facilitated by the Plan. Wastewater generated in the City is treated by the Sanitation Districts of Los Angeles County (LACSD). Wastewater generated in the City is treated at one or more of the following: the Whittier Narrows Reclamation Plant (WRP) located near the City of South El Monte, which has a capacity of 15 million gallons per day (mgd) and currently produces an average recycled water flow of 7.1 mgd; the Los Coyotes WRP located in the City of Cerritos, which has a capacity of 37.5 mgd and currently produces an average recycled water flow of 20.6 mgd; or the Joint Water Pollution Control Plan located in the City of Carson, which has a capacity of 400 mgd and currently produces an average flow of 252.7 mgd (County Sanitation Districts of Los Angeles County 2018). A majority of the wastewater from the City is treated and disposed of at LACSD’s Whittier Narrows Water Reclamation Plan and the San Jose Creek Water Reclamation Plant (Alhambra 2016a). The Whittier Narrows Water Reclamation Plant provides primary, secondary and tertiary treatment for 15 million gallons of wastewater per day, and the San Jose Creek Water Reclamation Plant provides primary, secondary and tertiary treatment for 100 million gallons of wastewater per day (Los Angeles County 2017). These plants are capable of treating the potential increase in wastewater associated with buildout under the Plan (see impact analysis U-2). Ultimately, treatment would produce a high quality tertiary effluent that can be used for a variety of industrial and irrigation purposes. Section 4.13, Utilities and Service Systems, contains a more detailed description of wastewater services for the City.

In addition, the following is added to the list of references in Section 7 of the EIR:

County Sanitation Districts of Los Angeles County. September 18, 2018. DEIR Response to Alhambra General Plan, Vision 2040 – A Community Mosaic.

Response 6.3

The commenter notes that Alhambra is located within the boundaries of Districts 2 and 16.
In response to this comment, the first sentence under subsection b on page 268 of the Draft EIR is revised to read as follows:

The Plan Area is located within the jurisdictional boundaries of Los Angeles County Sanitation Districts (LACSD) Districts 2 and 16.

Response 6.4
The commenter notes that the Districts charge a fee for connections to the Districts’ sewerage system.

This is understood. Developers in the City will continue to pay applicable fees for future connections to the Districts’ system.

Response 6.5
The commenter states that other information concerning the Districts’ facilities is current. No response is warranted.
From: Binquist, Jessica
Sent: Thursday, August 02, 2018 9:04 AM
To: Castagnola, Marc <mcastagnola@cityofalhambra.org>
Subject: FW: Public Comments on Draft General Plan and EIR

FYI

From: Binquist, Jessica
Sent: Thursday, August 02, 2018 9:03 AM
To: ‘Ranajit Sahu’
Cc: grassroostalhambroboard@gmail.com
Subject: RE: Public Comments on Draft General Plan and EIR

Hi Ran,
I received your email
Best,
Jessica

From: Ranajit Sahu [mailto:ropsahu@hotmail.com]
Sent: Wednesday, July 25, 2018 12:36 PM
To: Binquist, Jessica
Cc: grassroostalhambroboard@gmail.com
Subject: Public Comments on Draft General Plan and EIR

Hi Jessica

I understand from others that attended the CC Meeting last Monday that the draft GP and EIR will be available for public comment (via posting on the City’s website) on August 3 and that the comment period would run for
45 days. I also understand that the City has agreed to hold at least one public hearing during the comment period. Please confirm or correct my understanding on this.

Grassroots Alhambra intends to review both documents and make comments, as necessary. To that end, and recognizing that 45 days is not enough time to thoroughly analyze these complex documents, I am requesting that:

(i) when the draft GP and EIR are posted on the City’s website that ALL supporting documents including technical appendices, technical analyses, data sources relied upon, additional references relied upon, etc. be made available at the same time.

We want to avoid having to ask you separately for these additional documents as we begin our review and we want to also avoid having to request extensions of the public comment period (which we will be compelled to do) if these supporting documents are not provided from the get go. Please ask your consultants and staff to ensure that the record used to develop the draft GP and EIR is complete, well organized, and thus timely and fully available to the public.

(ii) you let us know when the public hearing will be scheduled so that we can appropriately arrange our schedules.

Happy to discuss if you have any questions. I am at 702.683.5466. As always, please confirm receipt of this email so I know that you received it.

Thanks

Ron Sahu
8.7 Letter 7

COMMENTER:  Ron Sahu

DATE:        August 2, 2018

The commenter states that Grassroots Alhambra intends to review the draft General Plan and EIR and requests that all materials related to both documents are made available to the public.

This request is noted. The draft General Plan and EIR, as well as supporting materials and appendices, were made available on the City’s website throughout the Draft EIR public review period.
Letter 8

From: Jason Chan <jchan.mail@gmail.com>
Sent: Tuesday, September 25, 2018 9:47 AM
To: Alhambra General Plan
Subject: Draft EIR comments
Attachments: LACExpo-TransitNP_4.11 Public Services.pdf

Community Development Department
Attn: Vanessa Reynoso, Deputy Director of Community Development

I am an Alhambra resident, and I work as a City Planner with the City of Los Angeles Department of City Planning. I have experience in both long range and current planning.

My family of 4 enjoy living in Alhambra. We appreciate the suburban lifestyle and unique historical neighborhoods that Alhambra offers. I’ve been a professional planner for 14 years and have conducted workshops and town halls just like the ones that Alhambra has completed for the General Plan Update.

I reviewed the Draft EIR, and the only issue I have is regarding Public Services - Recreational Services. I understand that the below-grade Union Pacific railroad corridor has been designated as open space for many years. But the Public Services chapter should include a table that lists all the City parks and open space by acreage, so that the true park inventory can be created. I’ve attached a sample from an EIR conducted for Los Angeles. It also may be found here: https://planning.lacity.org/eir/ExpositionCorridor/Eir/ECTNP%20Index.htm

Otherwise, park acreage could be found to be deficient, potentially creating an impact. Then the City should take the opportunity of re-designating the corridor as “right of way” instead of “open space.” Labeling the corridor in the same category as Granada or Almancor Park is disingenuous.

The same rail corridor runs through neighboring cities which designate it different than Alhambra: The City of Los Angeles designates the same corridor as public facilities, the City of Temple City designates it as industrial, and San Gabriel does not designate it with a land use at all. Also, the concept of placing parks and trails over the corridor is not realistic, as the City’s own draft plan acknowledges that Union Pacific does not support this concept. I recommend that the draft EIR remove the approximately 21 acres that encompass the corridor so residents have an accurate knowledge of our true open space resources.

Thanks
Jason
Alhambra Hills resident
City of Los Angeles General Plan Framework Element. The City of Los Angeles General Plan Framework, which is an element of the City of Los Angeles General Plan, was originally adopted in December 1996 and re-adapted in August 2001. The General Plan Framework provides guidance for long-term growth in the City and guides the update of community plans and Citywide elements. The General Plan Framework also contains purposes, policies, and programs for City development. Chapter 9 (Infrastructure and Public Services) of the Framework Element includes objectives, and policies applicable to library services (Table 4.11-11).

<table>
<thead>
<tr>
<th>Goal/Objective/Policy</th>
<th>Goal/Objective/Policy Description</th>
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<tr>
<td>FRAMEWORK ELEMENT — CHAPTER 9 INFRASTRUCTURE AND PUBLIC SERVICES</td>
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<tr>
<td>Policy 9.23.2</td>
<td>Prioritize the implementation of recreation and park projects in areas of the City with the greatest existing deficits.</td>
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<tr>
<td>Policy 9.23.3</td>
<td>Re-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public-private partnerships and so on.</td>
</tr>
<tr>
<td>Policy 9.23.7</td>
<td>Establish guidelines for developing non-traditional public park spaces like community gardens, farmer's markets and public places.</td>
</tr>
<tr>
<td>Policy 9.24.1</td>
<td>Phase the development of new programs and facilities to accommodate projected growth.</td>
</tr>
<tr>
<td>Objective 9.20</td>
<td>Adopt a citywide library service standard by the year 2020.</td>
</tr>
<tr>
<td>Objective 9.21</td>
<td>Ensure library services for current and future residents and businesses.</td>
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</tbody>
</table>

EXISTING SETTING

PUBLIC PARKS

The City of Los Angeles Department of Recreation and Parks (DRP) manages and provides parks and recreational services throughout the City. City park and recreation facilities include over 16,000 acres of parkland with over 444 park sites, including athletic fields, 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 33 senior centers, 36 skate parks, 13 golf courses, 12 museums, and 9 dog parks. In addition, the DRP also maintains 13 lakes, 92 miles of hiking trails, and operates 187 summer youth camps, and gang reduction and community intervention programs.

According to the City of Los Angeles Public Recreation Plan, parks can be classified as neighborhood, community, or regional. A neighborhood park should be a minimum of five acres in size (ideally 10 acres), with a service radius of a one-half mile. A community park should be a minimum of 15 acres in size (ideally 20 acres), with a service radius of two miles. Regional parks are generally over 50 acres in size and serve the city region. The Los Angeles County Department of Parks and Recreation manages regional parks, community parks, and golf courses that are available for all county residents to use.

There are currently 23 parks and recreational facilities providing service to the Project Area, including two regional parks, seven community parks, eight neighborhood parks, and six pocket parks. As a response to the need for additional park and recreational facilities, the DRP has implemented the 50 Parks Initiative which aims to better meet the park and recreational needs of the City's diverse communities by substantially increasing the number of citywide facilities, with a specific focus on densely-populated neighborhoods and communities lacking sufficient park space and recreational facilities. In total, one site has been secured.

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27City of Los Angeles, General Plan Public Recreation Plan, 1996.
Responses to Comments on the Draft EIR

and/or planned within two miles of the Project Area through the initiative. The city parks and recreational
facilities serving the Project Area are listed in Table 4.11-12. Figure 4.11-3 shows the locations of these
parks and recreational facilities.

<table>
<thead>
<tr>
<th>Name</th>
<th>Location</th>
<th>Facility Type</th>
<th>Acres</th>
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<tbody>
<tr>
<td>Baldwin Hills Recreation Center</td>
<td>6431 Highlight Pl.</td>
<td>Community Park</td>
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<tr>
<td>Culver Pepper Senior Center</td>
<td>1792 S La Cienega Blvd</td>
<td>Neighborhood Park</td>
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<td>Culver Civic Center</td>
<td>1793 S La Cienega Blvd</td>
<td>Neighborhood Park</td>
<td>0.3</td>
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<td>Palisades Park</td>
<td>13334 Santa Monica Blvd</td>
<td>Neighborhood Park</td>
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<tr>
<td>Cambridge Avenue Park</td>
<td>2350 S Gower Ave</td>
<td>Park</td>
<td>0.8</td>
</tr>
<tr>
<td>Inglewood Park</td>
<td>2550 Berwind Dr.</td>
<td>Park</td>
<td>0.3</td>
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<tr>
<td>Mar Vista Recreation Center</td>
<td>11400 Woodbine Ave.</td>
<td>Community Park</td>
<td>0.6</td>
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<tr>
<td>Rio Vista Recreation Center</td>
<td>1500 ½ Bundy Dr.</td>
<td>Park</td>
<td>2.22</td>
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<tr>
<td>Palisades Recreation Center</td>
<td>2552 Overland Ave.</td>
<td>Neighborhood Park</td>
<td>4.6</td>
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<tr>
<td>Palisades Golf Course</td>
<td>1341 Lake St.</td>
<td>Regional</td>
<td>0.7</td>
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<tr>
<td>Palisades Recreation Center</td>
<td>1341 Lake St.</td>
<td>Community Park</td>
<td>1.0</td>
</tr>
<tr>
<td>Palisades Golf Course</td>
<td>10400 Pico Blvd.</td>
<td>Regional</td>
<td>0.7</td>
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<td>Reseda Park</td>
<td>2800 Reseda Ave.</td>
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<td>1941 Reseda Blvd.</td>
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<td>Storer Recreational Center</td>
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<td>Westwood Memorial Park</td>
<td>1305 S Sepulveda Blvd</td>
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<td>Woodland Park</td>
<td>3459 Vinnet Ave.</td>
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<tr>
<td>Venice Recreation Site</td>
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<td>Cheviot Hills Park</td>
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<td>Westwood Gardens Park</td>
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<td>Westwood Neighborhood Park</td>
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<tr>
<td>Lomita Recreation Center</td>
<td>4031 West 26th St.</td>
<td>Community Park</td>
<td>0.4</td>
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</table>

SOURCE: City of Los Angeles Department of Recreation and Parks, 2013; TAPA, 2017.

As indicated previously, the City’s Public Recreation Plan states that in order to meet long-range local
recreational standards, a project must have a minimum of two acres of neighborhood facilities and two acres of
community recreational facilities for every 1,000 persons. Table 4.11-13 shows the existing demand for
neighborhood parks and community parks located in the Project Area. Currently, there is an insufficient
amount of available neighborhood parks. Based on the City’s recreational standards, deficits exist of
78.5 acres of neighborhood parks. The Project Area is sufficiently meeting the current demand for
community parks.

<table>
<thead>
<tr>
<th>Recreational Facility Type</th>
<th>Population (2015)</th>
<th>Demand per 1,000 residents</th>
<th>Demand for Recreational Facilities/a</th>
<th>Acres of Recreational Space Available</th>
<th>Acres of Deficit</th>
<th>Demand Not Met</th>
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<td>Pocket Parks</td>
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<tr>
<td>Neighborhood Parks</td>
<td>2</td>
<td>191.2</td>
<td>22.74</td>
<td>78.5</td>
<td>No</td>
<td>Yes</td>
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<tr>
<td>Community Parks</td>
<td>4</td>
<td>262.4</td>
<td>153.78</td>
<td>48.6</td>
<td>No</td>
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<tr>
<td>TOTAL</td>
<td>4</td>
<td>262.4</td>
<td>153.78</td>
<td>48.6</td>
<td>No</td>
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</tbody>
</table>

As existing demand is based on open space provisions as provided for each facility type for the City of Los Angeles Public Recreation Plan (2 acres per every 1,000 residents for neighborhood facilities; 4 acres for every 1,000 residents for community facilities. 2 acres per every 1,000 residents for regional parks).


1City of Los Angeles, General Plan Public Recreation Plan, 1980.
Exposition Corridor Transit Neighborhood Plan

Figure 4.1-3 Libraries, Parks, and Recreation Facilities

LEGEND:
- - - - ECTNP Boundary
 - - Expo LRT
 - Light Rail Station
 0.5-Mile Radius
 - Jurisdictional Boundary
- - Parks and Recreation Facilities

- Libraries
 1. West LA Regional
 2. Mar Vista
 3. Pico - Rancho Park
 4. Westwood
 5. Robertson

A project partially funded by the Los Angeles County Metropolitan Transportation Authority.

SOURCE: City of Los Angeles and TAHHA, 2017
2012-056
8.8 Letter 8

COMMENTER: Jason Chan

DATE: September 25, 2018

The commenter states a concern about feasibility of the linear park concept included in the draft General Plan and suggests that, without that facility, the recreation discussion in the Draft EIR would conclude that the City has a deficiency of park space.

A number of commenters have stated similar concerns and, based on the input from the community, the linear park concept will be removed from the draft General Plan. This has of course resulted in changes to the discussion of recreation in the Final EIR. It is true that without the linear park, meeting the City’s goals with respect to the provision of parks will be more challenging. However, a number of options for meeting local demand for recreational facilities will remain and the overall impact identified in the Draft EIR has not changed. It is important to note that, under CEQA, an environmental impact associated with recreation relates to the possible physical effects of providing parks (noise, for example), not to a deficiency of park space. Under CEQA, such a deficiency is a social impact rather than an environmental impact.
Letter 9

From: Tom Williams <ctwilliams2012@yahoo.com>
Sent: Wednesday, October 3, 2018 3:50 PM
To: Alhambra General Plan
Cc: Ywattson dalextreme.com; Paul Ferrazzi
Subject: Alhambra General Plan, Vision 2040, ENV-2018-yyy-xxx SCH# 2017051085
Attachments: NewPhEIRComs1003Fin.doc

DATE: October 3, 2018

TO: City of Alhambra Community Development Department

Attn: Vanessa Reynoso, Deputy Director of Community Development

111 S. First St., Alhambra, California, 91801

generalplan@cityofalhambra.org

cc:

FROM: Dr. Tom Williams Sr. Techn. Adviser, CCSC; Mbr.: SC-Env. Justice Comte.

4117 Barrett Rd. Los Angeles, CA 90032-1712 323-326-9682

SUBJECT: Alhambra General Plan, Vision 2040, Update Community Mosaic (Plan Update)

ENV-2018-yyy-xxx SCH# 2017051085

http://www.cityofalhambra.org/page/644/general_plan_update/

RE: Public Comments for Plan and Draft Environmental Impact Report (DEIR)

As indicated below, the current document (DEIR or DPEIR or DGPEIR) is totally inadequate and incomplete for purposes of CEQA and does not provide the Public with an objective, quantitative, full disclosure document. The current DEIR must be withdrawn, revised, and recirculated in an appropriate form, either DEIR or DPEIR or DGPEIR, not a combination of three.

I could provide a more complete comment review, another 20+ pages, but have clearly indicated the total lack of completeness, adequacy, and evidence based analyses. We will see you in later reviews in during settlement session.

DEIR is titled and submitted to the State as if a project DEIR, Draft EIR, which is appropriate for specific project requiring approval of a discretionary organization, e.g., rezoning. However, in only two sections of the DEIR, preparers claim that the DEIR is a draft program EIR (DPEIR) but do not consistently allege such status throughout the title nor footers. If no specific project is described and many potential projects are mentioned, the CEQA document is best described as a "Programmatic (or Program) Environment Impact Report" (article 11, Sec. 15168) with appropriate sections and description of future processes for "Project EIRs". However, no such claims were made for the CEQA
documents for the Housing Element, and a “project Negative Declaration” was circulated and certified for the “Project”. Furthermore the current CEQA preparers and City do not mention the EIR for a General Plan (D-GP-EIR) under CEQA Article 11, Sec. 15166. Such confusion leads has produced a lengthy but confused CEQA document without clear, objective, quantified setting, assessment, mitigation, and alternatives comparisons.

Revision of current zoning within and based on the General Plan (GP) can be considered the “project”, along with the total array of mitigation measures in the DEIR required of implementations of the GP changes.

No reference is made to earlier “EIRs” (1972-date) for the General Plan or its Elements, only a Negative Declaration for the 2008-2014 and 2013-2021 Housing Element(s). No relationships of the city’s 2013-2021 Housing Element with the other sectors of the city’s current GP therefore basic conflicts arise regarding populations and households which will not be updated currently.

The City and its preparers appear to have a basic process to avoid CEQA. No Alhambra CEQA documents are registered with SCH prior to 2005, and the first EIR was registered as an EIR + NOD, without NOP (2005071048 W Main Street Corridor Master Plan Project, NOD: 9/13/2006; EIR: 7/13/2006). As indicated, the current Housing Element must be considered inadequate as no record of Determination is available for the preceding 2008-14 Element. Furthermore, no records exists of preparation of CEQA documents for preceding plans back to 1980.

The entire consideration for the 2008-14 Housing Element appears suspect as no notice of determination was issued/circulated. Furthermore the current “Housing Element” is not included in the DEIR appendices although it forms an integral part of with widespread referral to housing in the General Plan population and households discussions, but without specific reference to section/page/paragraph in the current Housing Element. The City’s preparation of CEQA documents has been erratic at best as shown in Table 1. Many documents are not registered with the State Clearinghouse for CEQA. Review of the 2000-2018 records strongly suggest that the City has rejected the basic goals of CEQA and avoids preparation and closure of meaningful CEQA considerations of projects and their documents.

References, citations, and “bibliography” are totally useless for general Public review and meaningful comments as some are not cited to specific issues in text, others are incorrectly cited as to authors/dates, and generic citation to 50+ page documents render the citation totally inadequate and incomplete. Citations to personal communications are also totally incomplete as the Public has no access to such discussions.

See attached
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generalplan@cityofalhambra.org

cc: Dr. Tom Williams Sr. Tech. Adviser, CGSC; Mbr. SC-Env.Justice Comte.
4117 Barron Rd. Los Angeles, CA 90032-1712. 323-526-9332

SUBJECT: Alhambra General Plan, Version 2040. Upate Community Mosaic (Plan Update)

ENV-2018-yyy-xxx SCHR 2017051005
http://www.cityofalhambra.org/page/544/general_plan_update/

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Under the guise of being a generalized PA or GP-EIR the EIR text is so generalized as to render it totally incomplete and inadequate and must be thoroughly revised and quantified with appropriate citations and references, along with major new appendices and citations from EIR text.

Table 1. Online Records of CEQA Submittals to the California State Clearing House Number

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<th>St/Clear</th>
<th>Alhambra City Project</th>
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</table>

**SPECIFIC COMMENTS:**

14/2 Since..., any decision by a city affecting land use and development must be consistent with its adopted general plan... any future development projects proposed and approved, an action, program, or project would be considered consistent with the general plan if, considering all of its aspects, it further the objectives and policies outlined in the general plan or not obstruct their attainment. This text clearly indicates that all physical projects of the City are required to be compliant/consistent with the GP, and as such, the GP mitigates impacts of all projects which would otherwise occur.

14/5 This EIR fulfills the requirements for a program EIR... program EIRs are typically more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a project EIR... with the opportunity to consider broad policy alternatives and program-wide mitigation measures, and provides the City with greater flexibility to address environmental issues and/or cumulative impacts on a comprehensive basis.

14/6 Agencies... prepare program EIRs for... related actions... linked geographically... are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or are
individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways. By its nature, a program EIR considers the "macro" effects associated with implementing a program (such as a general plan or specific plan) and does not, and is not intended to, examine the specific environmental effects associated with particular projects...under general or specific plans.

14/7 Once a program EIR prepared, subsequent activities...must be examined in the light of that program EIR to determine what, if any, additional CEQA documentation needs to be prepared. If the program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the scope of the program EIR and additional environmental documents may not be required (CEQA Guidelines Section 15168(c)).

15/1 When a lead agency relies on a program EIR for a subsequent activity, it must incorporate applicable mitigation measures and alternatives developed in the program EIR into the subsequent activities (CEQA Guidelines Section 15168(c)(3)). If a subsequent activity would have effects not identified in the program EIR, the lead agency must prepare a new initial study leading to a "negative declaration" or a project-level EIR. In this case, the program EIR still serves a valuable purpose as the first-tier environmental analysis. The CEQA Guidelines (Section 15168(h)) encourage the use of program EIRs, citing five advantages:

1. Provision of a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR
2. Focus on cumulative impacts that might be slighted in a case-by-case analysis
3. Avoidance of continual reconsideration of recurring policy issues
4. Consideration of broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them
5. Reduction of paperwork by encouraging the reuse of data (through tiering)

15/2 As a "macro" level environmental document, the program EIR uses macro-level thresholds rather than the project-level thresholds that might be used for an EIR on a specific development project...determination that implementation of the Plan as a "program" would not have a significant environmental effect does not necessarily mean that an individual project would not have significant effects based on project-level CEQA thresholds...

No such statement was made for either versions of the Housing Elements or earlier General Plans and except for this and one later statement, no contention of use of "Program DEIR" is feasible and all references are for DEIR. Withdraw, revise, and re-circulate as a D-PEIR or a D-GPEIR.

The stated process is totally confused, unreasoned, and without quantification or required Mitigation/Monitoring/Report process.

31/1 Table 3 Quality of Life Maintain and enhance Alhambra's quality of life by supporting a strong local economy...recreational and cultural facilities...sustaining quality education opportunities, and ensuring access to quality housing. Goal QL-1 Attraction of...development types with...potential to create quality jobs

Goal QL-2 Attraction of...development types with...potential to create quality jobs

Goal QL-3 Capitalization on...proximity to...attract..."higher order" economic development (i.e., higher-paying jobs)

Goal QL-4 Reinvigoration of targeted sub-areas of the City to attract development to underutilized sites

Goal QL-5 Provision of adequate and accessible recreation and open space amenities...

Goal QL-6 Quality educational opportunities that maximize the use of school facilities

Define/greyload: maintain, enhance, strong, local economy, sustainability, ensuring, access, quality, attraction, usage and projections, and "would be" (vs "must" shall). Quality educational opportunities

Without clear definitions, revise all infrastructure analyses and separate water supplies/systems. Provide quantified listing of all such payments made since last GP.

Reference to local economy, access, quality jobs, sales tax revenues, capitalization, higher order or paying, etc., requires provisions of a thorough economic and financial setting/analyses of the City following the cessation of CRA and industrial area designations.

Provide maps and current/GP land use designations for all "targeted sub-areas" in the City.

102/3 The locations of some of the faults closest to Alhambra are shown in Figure 2A [source: ESRI, Licensor, and U.S. Geological Survey, 2010]. No active faults are known or suspected to traverse Alhambra and the City is not included in a special seismic zone established by the Alquist-Priolo Special Studies Zones Act of 1972. The East Montebello fault occurs into the City, but is not considered an active fault in Alhambra. Seismic activity from nearby faults...could cause substantial damage from ground shaking in the event of a major earthquake. Several major faults...have the potential for substantial damage in the event of a major earthquake. The San Andreas Fault is expected to be the source of major earthquakes within the next 30 years with a Richter magnitude exceeding 6.0. [No reference]
No reference sources provided.
No geologist is listed amongst preparers and geologic statements can not be considered credible and may be knowingly violate State law. Revise and reference speculations.

9.18

108/3 e. Regulatory Setting

The Environmental Management Element of the City's current General Plan (adopted in 1988) [30+ years ago]...examines existing resources and evaluates the potential for environmental and personal harm resulting from various hazards, including geologic hazards such as seismicity. No CEQA document has been associated with the 1988 GP which should have had an EIR. Define "attempt". Provide appendix for 1986 GP seismic hazards.

9.19

108/3 e. Regulatory Setting

... The Alhambra General Plan... City... amendments, and the City... Municipal Code attempt to safeguard life or limb, health, property, and public welfare. The Environmental Management Element of the City's current General Plan... concerned with both the man-made and natural environment of the City, and examines existing resources and evaluates the potential for environmental and personal harm resulting from various hazards, including geologic hazards such as seismicity... Alhambra uses the Los Angeles County Building Code, with City of Alhambra amendments, as well as the City of Alhambra Municipal Code, to control building design and construction... City of Alhambra... is in Seismic Zone 4, the area of greatest seismic risk, subject to the strictest building standards.

Provide definition/quantification: attempt, safeguard, examines, geologic hazards, seismicity (shaking, ground failures, landslides), greatest, and risks. No EME is used in the GP and the "current" GP was not reviewed under CEQA. Provide quantified analyses of current codes and most likely (1:50/100/1000years) Project Ground Acceleration for critical and hazardous facilities in Alhambra.

No search of SCEDC files was referenced and report of results was made, although "major" faults are referenced without reference to their earthquakes... Mention (312-313) as source is made to: "Southern California Earthquake Data Center. 2013a. "Elsinore Fault Zone." California Institute of Technology. Last modified: January 2013. Provide references in text and Bibliography.

9.20

122/2 Construction Emissions

... As stated in the CEQA and Climate Change white paper, "more study is needed to make this assessment or to develop separate thresholds for construction activity" (CAPCOA 2005). Nevertheless, air districts such as the SCAQMD (SCAQMD 2008) have recommended amortizing construction-related emissions over a 30-year period... Provide correct citations or references, including reference in Sec. 7.

9.21

164/3 The Plan also includes goals and policies designed to maximize stormwater infiltration, and to strengthen the City's maintenance program for stormwater detention basins and culverts, that would further improve water quality in the City.

Provide definition/quantification of maximize, strengthen, improve...

9.22

166/4 maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, detention and/or rainfall harvest and use. Plan goals and policies... regulations in the Alhambra Municipal Code, are designed to minimize operational stormwater impacts... Code Section 16.38.050 promotes LID to minimize urban runoff discharges from developed areas. Compliance... would reduce the risk of water contamination within the City from operation of new developments to the maximum extent practicable. Therefore, this impact would be less than significant. Provide definition/quantification of minimize, "operational stormwater impacts", promotes, LID, minimize, "urban runoff discharges", "reduce the risk of water contamination", and "maximum extent practicable" and incorporate into revised assessments and mitigation. Use of "practical" requires quantified, monetized analyses which must be provided.

9.23

The common phrase "this impact would be less than significant" cannot be justified as many issues relate to poorly or not defined mitigation to which the project or element must be consistent with or compliant to and therefore would be minimized/mitigated. Revise all such claims to "less than significant with mitigations".
169/3 This approach to stormwater management strives to restore a site's natural hydrologic features through the arrangement of buildings, roads, parking areas, site features and stormwater management plans. This more sustainable approach to site design helps to improve the quality of receiving waters and stabilizes the flow rates of nearby streams. LID site planning principles in the City's Municipal Code, with applicable NPDES regulations, would minimize changes resulting from drainage alterations. Resulting impacts would be less than significant.

169/4 Implementation of Plan policies and existing regulations would reduce impacts to a less than significant level. Therefore, mitigation is not required.

Provide definitions and quantification of strives, restore, "stormwater management plans", "more sustainable", "Site design", helps, improve, promotes, stabilize, nearby (vs downstream), "urban runoff discharges", "would", and "minimize" and incorporate into revised assessments and mitigation.

Provide references and appendix copies of appropriate Code and NPDES sections for LID.

The common phrase "this impact would be less than significant" cannot be justified as many issues relate to potable or not defined mitigation to which the project or element must be consistent with or compliant to and therefore would be minimized/mitigated. Revisit all such claims to "less than significant with mitigations".

170/2 Development facilitated by the Plan would be primarily infill in nature. Therefore, an incremental expansion in the quantity of net new impervious surfaces is expected as part of future development. Implementation of the following Plan goals and policies would help maximize stormwater infiltration, prevent increased runoff, and minimize potential flooding.

Provide definitions and quantifications of incremental, expansions, expansion, quantity, "net new impervious surfaces", expected, maximize, stormwater infiltration, prevent, increased runoff, and "minimize potential flooding".

As Plan goals and policies would help prevent and minimize potential flooding the goals and policies would be "mitigations".

215/1 Policy S1-58 Ensure development minimizes fire risk through application of appropriate fire code...

215/2 Implementation of these Plan policies and compliance with existing building and fire codes, would reduce potential fire hazards. Additionally, increases in population and intensification resulting from development facilitated by the Plan would require additional staff and support equipment, but not new or expanded fire facilities (Tom Phelps, Fire Chief, Personal Communication, 2017). Population growth that could occur under the Plan would not increase the need for fire and emergency medical services to a level where new or expanded facilities would be needed, and impacts would be less than significant.

Provide definitions/quantifications of incremental, expansions, expansion, quantity, "net new impervious surfaces", expected, maximize, stormwater infiltration, prevent, increased runoff, and "minimize", "appropriate fire code", implementation, compliance, "reduce potential fire hazards", "development facilitated", "additional staff and support equipment", and "not new or expanded fire facilities".

Citation: Tom Phelps, Fire Chief, Personal Communication, 2017 cannot be reviewed by the Public.

Provide text of PCs as an appendix for all personal communications used in this EIR.

217/5 The Quimby Act outlines...to assess new developments an impact fee for public development. Currently, Cal Trans requires that any person constructing...pay a $2,000 per and "new construction tax" to provide additional revenues to the City with which to finance public recreational facilities.

Provide copies in appendices and clearly define as to applying this fee to residential development and as to whether funds are limited only to property and purchases of physical facilities, vs. operations and maintenance.

Provide policy to expand requirements to all private land use development and allows for major maintenance of Public open space, not golf courses.

218/3 Policy QL-6F Encourage the development of quality commercial recreational facilities as privately held and City-owned land under long-term lease or concession agreements. Such agreements allow the City to provide a wider range of facilities...
Prohibit use of commercial/common/private recreational open space facilities from use in any mitigation or quantification of open space, recreational, or park spaces for the City.

218/3 Policy LIU-8E Investigate the potential for new parks, including in the I-710 right-of-way and an east-west park along the Union Pacific railroad. Both proposed parks are terrible projects and totally lack costs projections for the UPRR park, although at least three bridges (Westminister, Palm, and east edge of Golf Course/New Ave.) should be constructed for transportation planning. The I-710 property is largely inaccessible and subject to high noise levels; it far SW location renders it a Park for CSULA and NOT for the City. Eliminate all references to the UPRR Park without a signed MOA with the City and UPRR.

218/3 Policy QL-6F Encourage the development of quality commercial recreational facilities on privately held City-owned land under long-term lease or concession agreements. Such agreements allow the City to provide a wider range of facilities than it could on its own, without heavy financial risk.

218/3 Policy QL-6G Where feasible and desirable, utilize vacant properties to provide new open space and passive recreation opportunities in the form of pocket parks and/or community gardens.

218/3 Policy QL-6H Continue to charge park impact fees on new development. =Quimby Define/quantified: heavy, financial, feasible, desirable, pocket parks, vacant properties, community gardens.

Provide copies of Quimby related policies/requirements in appendices.

Provide a GP policy for expanding and applying Quimby requirements to all commercial and industrial land uses.

Provide GP policy to expand requirements to all private land use development and allowance for major maintenance of only for Public open space, not golf courses.

Provide GP policy for prohibition of inclusion of any commercial, common, or private "open spaces", recreational spaces in provisions for "PUBLIC open space or recreation facilities".

27/1 Quality of Life. This chapter addresses housing, environmental justice. Key goals include maintaining a strong local economy, ensuring access to quality housing, providing access to recreational and cultural facilities and activities, and maintaining quality educational opportunities.

218/3 Policy QL-6I Consider environmental justice issues as they relate to the equitable provision of desirable public amenities such as parks, recreational facilities, community gardens, and other beneficial uses that improve the quality of life.

The DEIR mentions EJ only in these two sections without elaborations.

Provide a thorough and complete review, setting, and analyses for Environmental Justice for all economic 10% groups for both individual and household incomes; similarly for ownerships and tenancies.

263/4 4.13 Utilities and Service Systems Section this evaluates potential Plan impacts to water, wastewater, and solid waste service, addresses potential impacts to storm drain infrastructure, and surface water quality.

Revise and provide Utility and Service Systems to include power and gas, not currently mentioned.

264/2 Imported Water The City receives direct delivery of imported water... developed to reduce a localized condition which exists in the western portion of the Main Basin. Alhambra Pumping Hole... receives little replenishment due to the hydropneumologic characteristics, produces extract water from the APH, which has resulted in declining water level elevation. To mitigate this condition, Alhambra would receive direct delivery of water from MWWD’s USG-5 service connection, and in exchange, the City would reduce its extraction of water from the APH. CWEA is cooperatively financed by the City and three of the parties to the agreement, excluding MWWD (Alhambra 2016a).


As this document has been a "Draft" after 2 years, and is not finalized, please revise throughout the DEIR.

265/2 The Area 3 Operable Unit... is located...on the west by the boundary of the Main Basin... EPA has...initiated a Remedial Investigation and Feasibility Study to identify the extent of the contamination and to evaluate appropriate cleanup remedies... all producers [including the City] to submit an application to 1) construct a new well, 2) modify an existing well, 3) destroy a well, or 4) construct a treatment facility. In 2006...to
construct a treatment facility to remove VOCs from wells. Operational in April 2006, but is necessary for Alhambra to receive a reliable source of supply from the groundwater basin. (Alhambra 2010a).

No relevance to General Plan is provided and is so generalized as to be totally inadequate for consideration of water supply or potential storage for LID infiltration. Provide a thorough geologic-groundwater models for the Alhambra groundwater rights and the potential benefit from 100% rain capture and infiltration.

Update this two year old Draft document.

9.35 Cont.

267/3 DMM NO. 3: CONSERVATION PRICING
The City has basic system operation fees. This tiered water rates structure effectively promotes water conservation by providing financial incentives. Those customers that conserve water will save money.

Provide quantified relevance to General Plan from Conservation Pricing.

9.36

268/2 DMM NO. 7: OTHER DEMAND MANAGEMENT MEASURES
The City also has additional DMM's such as a rain barrel and cisterns program, turf replacement program, high-efficiency toilet program, and residential plumbing retrofit (Alhambra 2015-UWMP).

Provide quantified relevance to General Plan from Conservation Pricing.

Provide current distribution and land area compliance for DMM and relevance to General Plan from DMM. Mis-cited/mis-referenced sources which are not available to public, provide in appendices.

9.37

128/  Table 14: Maximiz...Shading and Cooling. Expand urban tree forest. Increased tree plantings on public rights-of-way use cool roofs and surfaces to reduce electricity use.

Consistent Goal R-2 and Policy R-2A addresses the conservation and enhancement of open spaces, greenbelts, and natural areas and to preserve, maintain, and expand the number of trees in the urban forest. Also, Policy R-6C is to encourage the use of green building technology for building retrofits and pursue LEED-certification for new development.

Provide definitions and quantifications for maximize, expand, increased, public ROWs (vs public open spaces), addresses, encourage, and pursue.

Provide tree map for City.

9.38

149/2 Hazardous Materials Storage...California Building Code requirements prescribe safe accommodations...Compliance with all applicable federal and state laws related to the storage of hazardous materials would be implemented to maximize containment through safe handling and storage practices. Provide for prompt and effective cleanup.

Provide definitions and quantifications for above in revised EIR.

9.39

268/8 B. Wastewater
The Plan Area...All wastewater is treated on-site...No wastewater is treated or disposed of within the City boundaries...wastewater collection system for its water customers. The Sewer and Storm Drain Section of the Utilities Division maintains and operates the sewer collection system including storm drains, catch basins, and sewer lines (Alhambra 2015a). All wastewater collected...conveyed to the LACSD... (LACSD 2017d)

311/ Los Angeles County Flood Control District, 2013. Devil's Gate and Eaton Stormwater Flood....

Los Angeles Regional Water Quality Control Board (LARWQCB) 2016.

Los Angeles, County of, 2014. Tsunami Hazard Areas.

Los Angeles, County of, 2017. Information for Property Owners or Contractors.

Provide relevance to General Plan.

Sewers and storm drains are very different and stormdrains must not be combined to discharge to LACSD treatment and Storm flow are subject LID requirements which have General Plan implications.

Revise and quantify generalized statement.

Mis-cited/mis-referenced - Source not available to public.

9.40

275/4 The 2015 UWMP is an update... As described in Section 1.0, Introduction, this is a Program EIR, which will be used in the future for timing of project-level environmental review and CEQA documents.

No such statement was made for either versions of the Housing Elements or earlier General Plans and except for this and one later statement, no contention of use of "Program DEIR" is made and all references are for DEIR. Withdraw, revise, and recirculate as a D-PEIR or a D-GPEIR.

9.41
The DEIR does not provide the process, procedures, quantifications, and criteria required to tier down from a PG&EIR to a PJEIR. Provide thorough review of the required tiering efforts and a thorough MMRP in the revised EIR.

281/2. In summary, the Plan would demand a total water supply of 1.69 MGD (1,221 AFY). This increase would not exceed the UWMP’s projected available water supply... by 2040. Therefore, it is anticipated that water supplies will be sufficient to serve development facilitated by the Plan and impacts to water supplies would be less than significant.

281/3. The Plan... following goals and policies that aim to protect water resources and ensure that development that does not exceed infrastructure capabilities.

Provide definitions and quantifications for above in revised EIR.

281/4. Policy R-1E Encourage water conservation and, when feasible, use recycled water in residential, commercial, industrial, public, and other developments.

Policy R-1E Maximize stormwater infiltration through use of low-impact development methods. Provide definitions and quantifications for above in revised EIR.

282/1. Adherence to the policies in the Plan would serve to minimize impacts to water supplies and facilities. By limiting development in Alhambra to levels that are within the service capabilities... Implementation of the Plan’s goals and policies would ensure that water demand within the City does not exceed available supplies... new facilities or expansion of existing facilities... not be required to meet future demand. Developers would be required to pay for other water infrastructure required to operate proposed developments,...

Therefore, impacts related to water supplies and facilities would be less than significant.

Define/quantify: “within service capabilities”, limiting, ensure, available, maximize, future, demand (use and projections), and “would be” (vs “must”/”shall”). Without clear definitions, revise all infrastructure analyses and separate water supplies/systems. Provide quantified listing of all such payments made since last GP.

283/2. The Plan includes... following policies and actions relating to minimizing impacts associated with wastewater generation.

Provide “actions” added to all other such statements.

284/5. Resources Policy Maximize stormwater infiltration...

285/2. In the City, through its General Plan, encourages Low Impact Development... to limit excess water runoff and discharge into waterways. Stormwater policies in the 2040 General Plan would promote the mitigation of stormwater runoff through collection, drain age, and sustainable practices.

Mitigation Measure: Significant impacts have not been identified; therefore, mitigation is not required.

286/2. Policy SI-11B As feasible, emphasize source reduction and recycling... to maximize diversion of waste...

Policy SI-11C explore alternative strategies for minimizing waste... disposing... environmentally sensitive manner.

286/3. Compliance with... policies... other applicable regulatory requirements would further reduce the less than significant impacts to solid waste.

287/3. Services and Infrastructure Goals and Policies

Goal SI-II Solid waste services that meet the demands... operating in accord with applicable state requirements pertaining to solid waste diversion.

Policy SI-11A Provide an adequate... for collection and disposal of solid waste for... development.

Policy SI-11B As feasible, emphasize source reduction...recycling... to maximize diversion of waste...

Define/quantify: “adequate”, “feasible”, emphasize encourage, promote, alternative, strategies, explore, pertaining, minimizing, and maximize. Without clear definitions, revise all infrastructure analyses and separate wastewater (sewers) from stormwater (drains).

293/1. Policy R-5A Facilitate compact development patterns that minimize motor vehicles trips and VMT while maintaining community character.

Define/quantify: “facilitate, compact, minimize, maintaining, trips, and VMT. Clarify/Revise “Motor Vehicles” to exclude bus/ACT.

Revise to include PMT, passenger miles travelled.

307-14 7 References 7.1 Bibliography Not publicly accessible and not related to specific uses in text. Provide complete list of references in revised EIR.
9.49

9.50

9.51

370/3 Under the ownership of Republic Services, Allied Waste Services provides residential service and Consolidated Disposal provides commercial service to Alhambra (Aurora Environmental 2017).

274/2 Recyclables are collected in separate containers in Alhambra, at single family residences, some multi-family residences, businesses and agencies... achieve most of their waste diversion through mixed waste processing at MRFs... in 2016, the City of Alhambra disposed of 49,858 tons of waste... diversion rate of 65 percent... approximately 14,301 total gross tons of residual waste. In 2016, the City's contract hauler collected 1.40 tons of waste per single family household (Aurora Environmental 2017). [=2017a]

274/3 In 2016, the City's... haulers delivered recyclables and mixed waste for processing (i.e., recyclables recovery)... Republic Services processes an average of 4,800 tons of material daily using automated and manual sorting systems (Alhambra 2017b).

Rvise citations/references with page/paragraph and provide text in appendices as to the "personal communications".


Tignac, Scott. 2017. Title, Department, Simi Valley Landfill and Recycling Center... Personal Communication regarding with Rincon Consultants, Inc. July 28, 2017. Cited on pg. 274/1

Personal communications without description or content are not accessible for the general public and can not be used

314/ 7.2 List of Preparers Rincon Consultants, Inc.

No registered geologists, geotechnical engineers, traffic engineers, or other engineers are mentioned as involved in preparation of the DEIR, therefore the related DEIR statements must be considered as statements by those unqualified preparers listed without citation of any qualified specialist.
8.9 Letter 9

COMMENTER: Dr. Tom Williams

DATE: October 3, 2018

Response 9.1
The commenter states an opinion that the Draft EIR and should be redone and recirculated. The commenter also suggests that he could provide additional comments.
This opinion is noted. Please see responses 9.2 through 9.51 for responses to specific comments.

Response 9.2
The commenter suggests that the Draft EIR is titled a “Project EIR” and states that this is inappropriate.
This comment is inaccurate. The Draft EIR is described as a Program EIR. Please see page 14 of Section 1, Introduction, of the Draft EIR.

Response 9.3
The commenter mentions the Housing Element MND that the City previously prepared and states that the City does not mention the EIR for a General Plan.
The current Draft EIR does not tier from the MND previously prepared for the Housing Element so there is no reason to discuss that document in the Draft EIR. The draft General Plan does not conflict with any provision of the City’s adopted Housing Element.
The meaning of the comment regarding mentioning the EIR for the General Plan is not clear. The Draft EIR reviewed by the commenter is the EIR for the draft General Plan.

Response 9.4
The commenter states that revisions to the current zoning can be considered the “project”, along with mitigation measures in the Draft EIR.
The “project” analyzed in the Draft EIR is the draft General Plan. An update to the Zoning Code is expected to follow General Plan adoption, but is not part of the current project. Any update to the Zoning Code would be subject to its own environmental review under CEQA. Mitigation measures included in the Draft EIR are not part of the “project”, but any measures involving modifications or additions to the draft General Plan would become part of the General Plan if such modifications or additions are approved by the City Council in a certified Final EIR.

Response 9.5
The commenter states that the Draft EIR does not mention earlier CEQA documents, such as the Housing Element MND, and that for this reason there are conflicts between the draft General Plan and Housing Element.
As noted in Response 9.3, the Draft EIR does not tier from the Housing Element MND so there is no reason for the Draft EIR to discuss that document. The draft General Plan does not conflict with the...
adopted Housing Element. The preparer of the adopted Housing Element is part of the General Plan team and reviewed the draft General Plan to ensure that it does not create conflicts with the Housing Element. The commenter has provided no evidence of any specific conflicts.

Response 9.6

The commenter suggests that the City is trying to avoid CEQA because no documents are registered with the SCH prior to 2005. He also states that the current Housing Element is inadequate because no “record of determination” is available and because no records exist of CEQA documents for preceding plans.

The City clearly is not avoiding CEQA, as evidenced by the fact that it has prepared a Draft EIR for the draft General Plan. Whether other documents are registered with the SCH prior to 2005 is not relevant to the adequacy of current EIR. The lack of a determination on the SCH website does not render the City’s Housing Element inadequate. The current Housing Element was adopted in 2014. The City complied with CEQA, but is not required to submit a “Notice of Determination” (NOD) to the State Clearinghouse. Submittal of NODs reduces the statute of limitations on legal challenges for CEQA documents, but is not required under CEQA. Regardless, the statute of limitations on challenges to the referenced Housing Element MND has long since passed.

Response 9.7

The commenter again states a concern about the lack of reference to the Housing Element and past City practice with respect to preparation of CEQA documents.

The Housing Element, adopted in 2014, is available for review on the City’s website. Concerns about past CEQA documents is not relevant to the current Draft EIR. Please see responses 9.3, 9.5, and 9.6.

Response 9.8

The commenter suggests that references and citations in the Draft EIR are “useless.”

This opinion is noted, but a meaningful response to this general comment is not possible. The commenter’s concerns about specific citations are addressed in subsequent responses.

Response 9.9

The commenter again states an opinion that the Draft EIR and should be redone and recirculated. The commenter also suggests that he could provide additional comments.

This opinion is noted. Please see Response 9.1.

Response 9.10

The commenter again suggests that the Draft EIR is title a “Project EIR” and states that this is inappropriate.

This comment is inaccurate. Please see Response 9.2.

Response 9.11

The commenter again states that revisions to the current zoning can be considered the “project”, along with mitigation measures in the Draft EIR.
The “project” analyzed in the Draft EIR is the draft General Plan. Please see Response 9.4.

**Response 9.12**

The commenter again states that the Draft EIR does not mention earlier CEQA documents, such as the Housing Element MND, and that for this reason there are conflicts between the draft General Plan and Housing Element.

Please see Response 9.5. The commenter has provided no evidence of any specific conflicts.

**Response 9.13**

The commenter again suggests that the City is trying to avoid CEQA because no documents are registered with the SCH prior to 2005. He also states that the current Housing Element is inadequate because no “record of determination” is available and because no records exist of CEQA documents for preceding plans.

This statement is inaccurate. Please see Response 9.6.

**Response 9.14**

The commenter again states a concern about the lack of reference to the Housing Element and past City practice with respect to preparation of CEQA documents. The commenter also reiterates a concern about the references and citations, claims that the City’s preparation of CEQA documents is “erratic,” notes that some documents are not listed at the SCH, and lists number of CEQA documents from the SCH.

Please see responses 9.3, 9.5, 9.6, and 9.8 regarding the concerns about the Housing Element and references/citations. As discussed in Response 9.6, the City is not obligated to submit every CEQA document to the SCH. Only documents for which there is a state “responsible agency” must be sent to the SCH. Regardless, although not relevant to the adequacy of the current Draft EIR, the lengthy list of CEQA documents provided by the commenter belies the claim that the City’s preparation of CEQA documents is “erratic.”

**Response 9.15**

The commenter suggests that the Draft EIR states that the General Plan mitigates all impacts of projects that would otherwise occur.

This is not accurate. The Draft EIR does not state that the General Plan mitigates all impacts of future development projects in the City. To the contrary, the Draft EIR explicitly acknowledges that individual development projects could potentially have significant “project-level” impacts beyond what is and can be identified in the program-level EIR for the General Plan. The General Plan is aimed, in part, at addressing the potentially significant environmental effects of future actions in the City, but cannot guarantee that individual projects would not have significant effects. Future development projects that would or may have significant environmental effects beyond those identified in the Draft EIR for the General Plan would need to undergo project-level environmental review under CEQA.
Response 9.16

The commenter describes the purpose of program EIRs per the State CEQA Guidelines, suggests that previous CEQA documents do not describe this purpose, and suggests that the process is “confused, unreasoned, and without quantification.”

The description of the purpose of program EIRs is accurate and consistent with what is stated in the Draft EIR (see Response 9.2). The Draft EIR does not tier from or rely on previous CEQA documents so what is stated or not stated in other CEQA documents is not relevant to the current document. The opinion regarding the document is noted, but absent more specificity regarding the commenter’s concerns, a meaningful response to this general comment is not possible. The Draft EIR does quantify estimated growth in the City over the life of the General Plan as well as impacts of such growth.

Response 9.17

The commenter asks for definitions of various terms from the draft General Plan, suggests that more thorough economic and financial analysis is needed, and requests maps and current land use designations for “targeted sub-areas.”

The comments about terminology from the draft General Plan do not pertain to the Draft EIR’s adequacy. The draft General Plan attempts to include language that clearly states the intent of goals and policies, but of course, all goals and policies will ultimately subject to the interpretation of City decision makers. For example, terms like “quality jobs”, “quality housing,” and “quality education” will require use of discretion by decision makers, but are intended to provide general guidance regarding the thought process that decision makers should undertake when considering future actions.

The concern about economic and financial analysis is not relevant to the Draft EIR, which in accordance with CEQA, focuses on the draft General Plan’s environmental impacts. That said, the Quality of Life chapter of the draft General Plan includes information about the current fiscal situation in the City and an economic/market study conducted to inform the General Plan is included in Appendix C of the Draft EIR.

The land use map contained in the draft General Plan is included in Section 2, Project Description, of the Draft EIR. See Figure 5. The current General Plan land use map can be viewed at City Hall or online at [http://www.cityofalhambra.org/imagesfile/file/201311/general_plan_map.pdf](http://www.cityofalhambra.org/imagesfile/file/201311/general_plan_map.pdf). For the most part, the targeted sub-areas to which the commenter refers do not involve General Plan land use designation changes. One exception is the Garfield Avenue corridor, for which the General Plan includes a new Medical Office designation.

Response 9.18

The commenter states an opinion that several statements regarding the locations of fault lines are not credible, requests additional references, and suggests the statements may be in violation of state law.

In addition to the current General Plan, sources of the information provided in the passage in question in Section 4.4, Geology and Soils, of the Draft EIR, include:

The commenter has provided no evidence that any of the statements in the Draft EIR are incorrect or that any fault lines are incorrectly described. It is not clear what state law the commenter believes this discussion may violate so a meaningful response to this part of the comment is not possible.

**Response 9.19**

The commenter suggests that no EIR is associated with the current General Plan and requests an appendix for 1986 General Plan seismic hazards.

The fact that the commenter was unable to find the EIR for the 1986 General Plan on the SCH website does not mean that an EIR was not prepared. The SCH’s CEQAnet only contains key information from all CEQA documents submitted to the SCH for state review since 1990. Regardless, the reference in the Draft EIR to which the commenter refers is to the General Plan, not the General Plan EIR. The current General Plan, including the Safety Element, can be viewed at the Community Development Department at Alhambra City Hall.

**Response 9.20**

The commenter requests definitions and quantification, suggests that an Environmental Management Element was not used in the draft General Plan, and suggests that additional information sources should have been referenced.

Certain terms mentioned by the commenter (e.g., “attempt”, “examines,” “greatest”, “risks”) are common terms. The various geologic terms are described/defined in Section 4.4, Geology and Soils, of the Draft EIR. The draft General Plan follows a different layout/organization than the current General Plan and does not include an Environmental Management Element. Instead, geologic and seismic hazards are addressed in the Health & Safety chapter, which covers the same range of issues addressed in the current General Plan. The draft General Plan is a policy document that provides general guidance regarding how the City will develop through 2040 and the Draft EIR is an analytical document that addresses the potential environmental impacts of the draft General Plan. Neither document is intended to be an encyclopedic review of southern California geologic or seismic issues. The information provided in Section 4.4 of the Draft EIR is considered sufficient to understand the impacts of the draft General Plan with respect to geologic hazards.

**Response 9.21**

The commenter requests correct citations regarding statements pertaining to GHG construction emissions.

The referenced CAPCOA document is *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA)*. The referenced SCAQMD document was inadvertently left out the list of references in Section 7 of the Draft EIR. That reference, listed below, has been added to the Final EIR:

Response 9.22

The commenter requests definition/quantification of the terms maximize, strengthen, and improve. The terms strengthen and improve clearly relate to improving the stormwater maintenance program to reduce overall surface runoff and pollutants in runoff. The term maximize suggests that the City will improve these systems to the maximum degree feasible given physical, financial, and regulatory constraints. For all new developments, the City will continue to enforce applicable federal and state requirements pertaining to stormwater runoff. These limit peak runoff from new developments to no more than pre-project levels.

Response 9.23

The commenter again requests definitions for such terms as “maximum extent practicable” and “maximum extent feasible” and suggests that use of the term “practical” requires “quantified, monetarized analysis”

The federal Clean Water Act (CWA) provides that National Pollutant Discharge Elimination System (NPDES) permits for Municipal Separate Storm Sewer Systems (MS4) must require municipalities to reduce pollutants in their storm water discharges to the MEP. (CWA 402(p)(3)(B)) MS4 permits "shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and system, design and engineering methods." (Id.)

Per the federal Clean Water Act, the maximum extent practicable (MEP) standard involves applying best management practices (BMPs) that are effective in reducing the discharge of pollutants in storm water runoff. In discussing the MEP standard, the State Board has said the following: "There must be a serious attempt to comply, and practical solutions may not be lightly rejected. If, from the list of BMPs, a permittee chooses only a few of the least expensive methods, it is likely that MEP has not been met. On the other hand, if a permittee employs all applicable BMPs except those where it can show that they are not technically feasible in the locality, or whose cost would exceed any benefit to be derived, it would have met the standard. MEP requires permittees to choose effective BMPs, and to reject applicable BMPs only where other effective BMPs will serve the same purpose, the BMPs would not be technically feasible, or the cost would be prohibitive." (Order No. WQ 2000-11, at p.20, https://www.waterboards.ca.gov/water_issues/programs/stormwater/smallms4faq.shtml). MEP is the result of the cumulative effect of implementing, continuously evaluating, and making corresponding changes to a variety of technically and economically feasible BMPs that ensures the most appropriate controls are implemented in the most effective manner. The preamble to the Federal Register states: "EPA has intentionally not provided a precise definition of MEP to allow maximum flexibility in MS4 permitting. MS4s need the flexibility to optimize reductions in storm water pollutants on a location-by-location basis. EPA envisions that this evaluative process will consider such factors as conditions of receiving waters, specific local concerns, and other aspects included in a comprehensive watershed plan. Other factors may include MS4 size, climate, implementation schedules, current ability to finance the program, beneficial use of receiving water, hydrology, geology, and capacity to perform operation and maintenance." (Id.)

The commenter’s suggestion that the maximum extent practicable for feasible must be “monetarized” in CEQA documents is not correct. Costs for compliance with NPDES requirements may be a consideration for applicants and regulators in the selection of BMPs, but are not a CEQA consideration.
Response 9.24

The commenter states an opinion that the finding of a less than significant impact cannot be justified in some cases and should be changed to less than significant with mitigation.

This opinion is noted, but absent more specificity regarding which findings the commenter believes are incorrect, a meaningful response to this general comment is not possible. It should be noted that a finding of “less than significant with mitigation” would only apply when an impact is identified as potentially significant without mitigation measures, which are actions to be taken above and beyond what is proposed as part of the project or what is already required by existing regulations. In many instances, the Draft EIR concludes that impacts are less than significant based on compliance with proposed General Plan policies and/or other existing regulatory requirements.

Response 9.25

The commenter again asks for definitions of various terms and suggests that the conclusion that the conclusion that impacts would be less than significant cannot be justified.

The terms in question are discussed and defined in Section 4.7, Hydrology and Water Quality. The commenter continues to state confusion about the term “mitigation.” The National Pollutant Discharge Elimination System (NPDES) and Low Impact Development (LID) standards discussed in Section 4.7 are existing regulations implemented at the federal, state, and local levels. Given that developed nature of Alhambra, virtually any new development activity in the City would involve replacement of existing development with new development that meets current regulatory standards pertaining to surface runoff, which are stricter than the standards to which most existing development was subject and allow no net increase in peak surface runoff from individual sites. Based on these facts, the Draft EIR concludes that any redevelopment that occurs under the guise of the draft General Plan would not adversely affect local or regional hydrological conditions or water quality. Also, please see responses 9.23 and 9.24.

Response 9.26

The commenter again requests definitions for and quantification of stormwater-related items.

Please see responses 9.24, 9.25, and 9.26. The terms mentioned by the commenter are either discussed in Section 4.7 or common terms (e.g., prevent, minimize, expansion). Quantification of the overall change in surface runoff would be speculative since the size, nature, and locations of future developments in the City are not known at this time. Regardless, as discussed above, all development in the City would be subject to existing regulations, which do not allow an increase in peak surface runoff from pre-development levels.

Response 9.27

The commenter again requests definitions for various terms, requests additional information regarding fire service, and suggests documentation of a personal communication with the Fire Chief.

Again, the terms mentioned by the commenter are either defined in the Draft EIR or common terms such as prevent, implementation, and compliance.

With respect to fire service, the purpose of the Draft EIR analysis is to identify any potential physical environmental effects that may result from the provision of fire protection service. Impacts to service or the need for new staff or equipment would constitute any environmental effects only if such an impact creates a physical effect to the environment (such as through the construction of a
new or expanded fire station). The City Fire Department has indicated that growth under the General Plan would not create the need for new or expanded facilities; thus, it would not have a significant environmental effect related to fire service under CEQA. The Draft EIR analysis reflects items discussed with the City Fire Department as well as Fire Code requirements.

Response 9.28
The commenter requests additional information about how Quimby Act fees can be used and suggests inclusion of a policy to expand fees to all private land use development and use of fees for public open space, not golf courses.

Per the Quimby Act, Chapter 5.06 of the Alhambra Municipal Code requires that any person constructing any new dwelling unit, or trailer space, in the City pay a $2,000 per unit “new construction tax” to provide additional revenues to the City that can be used to finance public recreational facilities (see Section 4.11, Public Services, of the Draft EIR). The suggestion regarding new policy is noted, but does not pertain to a significant impact identified in the Draft EIR.

Response 9.29
The commenter suggests that the City should not consider the use of private recreational facilities as “mitigation or quantification” of parks or open space.

The policy referenced by the commenter is not “mitigation” under CEQA. It is a policy statement in the draft General Plan. Quantification of available parks/open space in the City does not include private recreational facilities. Nevertheless, City staff believe that the policy encouraging the development of private recreational facilities to help address local recreational demands is reasonable.

Response 9.30
The commenter states concerns about two possible recreational facilities mentioned in the draft General Plan and suggests that three bridges should be considered.

These are comments on the draft General Plan, not the Draft EIR. In response to this and other comments, the linear park concept is being removed from the draft General Plan, though the possible park at the northern 710 Freeway stub will remain for future consideration. The idea of bridges similar to what the commenter suggests was considered, but determined that they are not desirable since they would likely increase cut through traffic on nearby residential streets. This would be inconsistent with Policy M-1E of the Mobility chapter of the draft General Plan.

Response 9.31
The commenter restates suggestions regarding Quimby Act fees.

Please see responses 9.28 and 9.30. The comments about the General Plan rather than the Draft and will be considered by City decision makers.

Response 9.32
The commenter requests a more thorough discussion of environmental justice.
Environmental justice is not an environmental issue under CEQA. Issues relevant to environmental justice are discussed in various Draft EIR section, including but not limited to, 4.2, Air Quality, 4.6, Hazards and Hazardous Materials, and 4.9, Noise.

Response 9.33
The commenter suggests that the Utilities and Service Systems section of the Draft EIR should discuss power and gas.

Per the environmental checklist in Appendix G of the CEQA Guidelines, power (electricity) and gas are not topics to be considered under Utilities and Service Systems. Energy use is, however, discussed in the Resources chapter of the draft General Plan and the environmental effects associated with energy use are discussed in sections 4.2, Air Quality, and 4.5, Greenhouse Gas Emissions, of the Draft EIR.

Response 9.34
The commenter suggests that references to the draft Urban Water Management Plan (UWMP) in the Draft EIR should be revised to reflect that the fact that UWMP remains a draft document.

The references in the Draft EIR have been revised to note that the UWMP remains a draft plan. Data from the UWMP included in the Draft EIR remains accurate.

Response 9.35
The commenter states an opinion that the discussion of water supplies, including the UWMP, in the Draft EIR is not relevant to the General Plan and suggests that modeling of groundwater, rainfall, and infiltration.

The General Plan is not a water supply study, but a general policy guide for the City. The UWMP referenced in the draft EIR and this comment is the plan that provides the types of details requested by the commenter. The General Plan appropriately relies on data from the UWMP and references the UWMP with respect to water planning and policy in the City.

Response 9.36
The commenter requests explanation of the quantified relevance of conservation pricing to the General Plan.

It is not clear what the commenter means by “quantified relevance,” but, as discussed above, the General Plan is a general policy guide for the City. The conservative pricing mentioned by the commenter is existing policy in the City, not something new that is proposed as part of the General Plan. It is not the purpose of the General Plan or the General Plan EIR to justify existing City policies and programs.

Response 9.37
The commenter requests explanation of the quantified relevance of other existing water demand measures and suggests that a reference in the Draft EIR is incorrect.

Please see Response 9.36. It is not the purpose of the General Plan or General Plan EIR to justify existing City policies. The Community Profile referenced by the commenter is dated November 2015. It is not clear why the commenter believes the date is incorrect.
Response 9.38

The commenter requests definitions for several terms and also requests a tree map for the City.

Most of the terms mentioned by the commenter (e.g., expand, increase, expand, encourage) are common terms. The first three generally suggest an increase, while the term encourage suggests something that the City would like to see happen, but that is not mandatory. The term “right-of—way” refers to public roads and sidewalks (i.e., travel paths), not parks or open space.

Providing a map of all of the trees in Alhambra would serve little purpose and, at a scale that would fit into the Draft EIR, would provide no meaningful information about the number, size, or locations of trees in the City.

Response 9.39

The commenter again requests definitions and quantification for several terms.

The discussion cited by the commenter provides a general overview of how hazardous material storage is regulated. As noted in the Draft EIR, a myriad of state and federal regulations governs the use, storage, and transport of hazardous materials. The terms in questions cannot be quantified as requested, but terms such as “safe accommodations”, “maximize containment”, and “prompt and effective cleanup” simply relate to the goals of the various regulations to ensure that hazardous materials are appropriately contained and that if accidental releases occur, they are appropriately addressed. Of course, the applicable regulations also prescribe the techniques that must be followed to achieve these goals.

Response 9.40

The commenters asks for the relevance of the analysis of wastewater-related impacts to the General Plan, suggests that sewers and storm drains must be considered separately, requests quantification, and suggests that a reference is mis-cited.

The environmental checklist in Appendix G of the CEQA Guidelines includes specific questions related to wastewater generation and treatment that must be addressed under CEQA. The purpose of the Draft EIR analysis is to determine whether or not wastewater generated by development under the draft General Plan would exceed wastewater treatment capabilities.

While sewers and storm drains generally serve different purposes, they are connected and storm drain runoff in some cases flows to wastewater treatment facilities. The passage referenced by the commenter merely references this fact and the fact that the City’s Utilities Division maintains and operates both sewers and storm drains. This statement has no bearing on the determination regarding the impact of the General Plan with respect to wastewater treatment.

It is not clear what quantification the commenter is requesting, but the analysis of wastewater-related impacts under Impact U-2 in Section 4.13, Utilities and Service Systems, of the Draft EIR quantifies wastewater generation under the General Plan and compares forecast wastewater to treatment system capacity.

The documents to which the commenter refers are not mis-cited. Both documents are available online as indicated in Section 7, References.
Response 9.41
The commenter states that neither the Housing Element nor earlier General Plans mention a Program EIR and suggests that for this reason the Draft EIR should be recirculated.

This opinion is noted, but it is not clear why the commenter believes that the content of CEQA documents on other projects invalidates the current EIR, which is clearly described as a Program EIR. The commenter has provided no factual basis to support the contention that the Draft EIR needs to be recirculated.

Response 9.42
The commenter requests definitions and quantification to support the policy that development should not exceed the capacity of infrastructure.

It is not clear what definitions the commenter believes are unclear, but the policy in question simply states that development that the City will not approve development that exceeds the infrastructure capacity. Section 4.13, Utilities and Services Systems, of the Draft EIR quantifies water demand and wastewater and solid wastewater generation, and compares forecasts of water, wastewater, and solid waste to the capacity of water, wastewater, and solid waste infrastructure.

Response 9.43
The commenter again requests definitions and quantification.

It is not clear what definitions the commenter is seeking. The policy statement in question merely suggests that the City will practice water conservation and use recycled water where feasible. Again, it should be noted that the General Plan is a policy document that provides general direction. It is not intended to address all of the specific technical approaches regarding how water conservation is to be achieved and recycled water is to be used.

Response 9.44
The commenter again requests definition/quantification, suggests that more definitive statements are needed, and requests a quantified listing of payments made since the last General Plan.

Again, it is not clear what definitions the commenter is seeking. Water demand and wastewater generation are quantified in Draft EIR Section 4.13, Utilities and Service Systems, and compared to system capacities. It is also not clear what payments the commenter is referring to, but regardless, payments made since the last General Plan was adopted in 1986 have no relevance to the current General Plan.

With respect to the concern about the use of “would” versus “must” or “shall”, the commenter is confused by the purpose of the statement to which he is referring. The passage in question is analytical in nature, as is the Draft EIR generally. The term “would” suggests what would happen if the General Plan is implemented. Obviously, it would make no sense to suggest that the General Plan “must” have an impact, for example.

Response 9.45
The commenter suggests providing actions to other statements.
Again, the meaning of this suggestion is not clear. Absent more specificity regarding what actions the commenter believe should be added and what they should be added to, a meaningful response to this comment is not possible.

Response 9.46

The commenter again requests definitions of various terms and suggests that all infrastructure analysis should be revised.

Again, the commenter is simply asking for definitions of common terms from the draft General Plan. These comments relate to draft General Plan policies, not the Draft EIR analysis. City decision makers interpret these and all other terms as they relate to future actions under consideration and their applicability to the General Plan. Also, see Response 9.40.

Response 9.47

The commenter again requests definitions of various terms and suggests that a draft General Plan policy should include a reference to passenger miles traveled (PMT).

Again, this is a comment on the draft General Plan rather than the Draft EIR analysis. The purpose of the policy is to reduce overall motor vehicle trips and vehicle miles traveled (VMT). This includes bus trips, but the overall reduction in motor vehicle trips may be reduced in part by replacing drive alone automobile trips with bus trips that carry multiple passengers.

Response 9.48

The commenter suggests that the references list is not complete.

Please see prior responses for discussion of specific references that the commenter has suggested are missing or erroneous. A meaningful response to this general comment is not possible.

Response 9.49

The commenter again requests clarification regarding a personal communication.

The content of the personal communication in question is reflected in the Draft EIR text and the individual contacted is listed in the Draft EIR references.

Response 9.50

The commenter suggests that a personal communication with the Sanitation Districts cannot be used without a description of the content of the communication.

The Draft EIR text on the page cited by the commenter reflects the content of the communication with the Sanitation Districts. This is a legitimate source and citation. Also, please note that the Sanitation Districts provided a comment letter on the Draft EIR (see Letter 6) and raised no specific concerns about the passage cited by the commenter.

Response 9.51

The commenter states an opinion that because no registered geologists or engineers are among the EIR preparers, the preparers are “unqualified.”
This opinion is noted, though CEQA does not require that EIRs be prepared by engineers. Although engineers are frequently consulted for certain topics, they rarely prepare CEQA documents. For program level analysis such as the General Plan EIR, specialized individuals such as engineers are less frequently consulted or needed than for project-level EIRs, where specific engineering issues may arise.
Comments Regarding Draft General Plan Update and Accompanying Environmental Impact Report

I apologize for the length of this communication, but it is an important topic and the Draft General Plan Update and accompanying Environmental Impact Report are rather lengthy documents. Sorry.

First, and foremost, I feel that you cannot have a “plan” to guide a city’s development and growth without including Housing as one of the primary components. Housing is an integral part of all other elements of a truly comprehensive plan. I realize that the city’s Housing Plan does not need to be updated at this time, but it will need to be updated soon. I suggest that either the update to the Housing element be advanced, or that this General Plan Update be delayed (it’s already been over thirty years, what’s another year or two?) so that the Housing element can be aligned with, and become an integral part of the overall General Plan. This would be the only way to have a complete and comprehensive Plan to guide the city in the years to come.

Overall, I was very disappointed after reading the Draft General Plan Update and accompanying Environmental Impact Report, as there was very little “plan” to it. After reading, it is easy to see why Rincon Consultants were so insistent on keeping the “linear park” and hotel development in their plan, even after such negative public reaction at the Community Workshops. There isn’t much else to the plan other than some suggestions to improve street-view aesthetics. The Open Space and the proposed bicycle path network mentioned in the Plan are primarily dependent on the unrealistic linear park and the highly unpopular East Valley Hospitality and Entertainment District, which after much negative public comment, still remain as core components of the Plan.

If you were to remove the phrase “cross-town parkway along the existing rail corridor that enhances recreational opportunities while improving opportunities for walking and biking to a variety of destinations” from the Plan’s stated goals, all that would remain is

“The goal of the Plan is to maintain stable residential neighborhoods, enhance commercial corridors, establish industrial and commercial districts that meet local demand, and continue to beautify the community with improved streetscapes, gateways, and parks.”

Not much of a “Plan” to guide the city for the next 20+ years. And certainly not much different from the Plan that has been guiding the city for over the past three decades.

Let me list some of my specific comments and concerns.

General
Responses to Comments on the Draft EIR

- Specific Plans: The draft Plan states that a Specific Plan serves as a link between the General Plan Policies and proposed development in a particular area. It has been my observation, however, that in the past, Specific Plans have often been used as exceptions to the General Plan, rather than links to its policies. With an approved comprehensive General Plan as a guide, Specific Plans should not be necessary.

- There are a number of inconsistencies throughout the Plan, such as the percentage of Open Space within the city, which ranges anywhere from 5% to 9%, depending on the table or description viewed.

Land Use and Community Design

- The Plan and EIR, as written, seem to anticipate "normal" use and development along and near the Fremont Avenue corridor. Two major developments in this area have already been given tentative approval by the city, including a 1,081 unit condo/apartment mixed use development, which by itself would nearly meet the projected 2040 housing need. Projects of this size and scope already given tentative approval should be included in the General Plan and EIR, since those developments will seriously compound impacts on the city, its infrastructure, and mobility issues.

- The Plan defines "Industrial" Land Use as comprising a large variety of uses including laboratories, lumberyards, adult businesses, and automotive service stations. It also includes residences, with the approval of a conditional use permit. This definition on page 20 of the Plan is the only reference to residences being part of an Industrial area, with no density limitations listed. Residential areas within industrial zones need to be more prominently identified throughout the Plan, such as on Land Use Maps, tables and other descriptions, as well as a more specific definition of residential density. The way it is presented (or rather, not presented) makes this residential area look "hidden" from the public. Additionally, this seems to be a very risky and unpredictable combination of land uses within an area and should be avoided.

- I suggest that the city require mobility issues or deficits to be addressed or mitigated before any new development is approved. Example: If a development is planned near an already impacted area, or an area that is shown by an EIR that it will be impacted by the project, the City should require that any mobility mitigation measures be in place and successful, including additionally needed public transit or alternative transit plans, prior to development.

- EIR, Impact PH-2: Referring to the Garfield Medical Corridor and other areas of residential redevelopment, "The number of existing housing units that could be displaced would be less than the projected number of new housing units developed, and therefore no significant housing or population displacement would occur, making this impact less than significant." While there may be no significant difference in number of housing units, families that would be displaced are currently living in relatively low cost housing and likely would not be able to afford the cost of new replacement housing. This would certainly be significant to them!

- EIR, Impact PS-4: The need for additional parks and open space for the projected 1,878 new residents is deemed less than significant only because of the Plan's dependence on the linear park and land from the 710 stub. The linear park solution is unfeasible and the 710 stub solution unlikely.

- Page 206 of the EIR notes that, State Housing Elements statute mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community." "As a result, state housing policy rests largely upon the effective implementation of local General Plans, and in particular, housing elements." (This reinforces my argument that the General Plan and Housing Elements should be developed in concert.) In citing the 2008 SCAG RCP Land Use Policies, the EIR notes that "there are adequate vacant and underutilized sites to accommodate the RHNA allocation of 1,492 units
by 2021," with 604 of these units needed for lower income households and 248 needed for moderate income households. The EIR also notes that there are no proposed projects to add more lower or moderate income housing. This Plan, as well as SCAG RCP Policies, recommends that the city convert “vacant or aging commercial, office, and some industrial properties to housing and mixed-use with housing.” While this may increase the overall number of housing units available, it would dramatically decrease the number of units available to lower and moderate income households.

- The EIR also notes that the SCAG 2016 RCP/SCS has foundational policies, which are intended to guide the development of member jurisdictions’ land use strategies. The General Plan states that it does not conflict with these policies. I question, however, strategy number 6, stating that the city should “Plan for changing demand in types of housing.” By following policies in this General Plan, such as those noted above, will there be a change in demand for housing, or will it be a change in availability?

- The East Valley Boulevard Hospitality/Entertainment District is one of the core elements of this Plan, despite the public sentiment against it, as demonstrated at all public workshops. Of the (few) specific projects recommended in the Plan, this is the one that generates the most negative impact on the city, as reported in the EIR. To justify this impact on the city residents and visitors, the Plan cites a possible new source of income to the city from potential hotel “leakage” from adjoining cities. While the Plan states there is a need for a hotel, it does not present any evidence of that need, nor show any evidence that a hotel at that location might be successful and worth the disruption of current businesses and residents. The Plan also neglects to mention that there is already an established large chain hotel, a newly opened hotel, and five other hotels currently under construction or development within ½ mile of Alhambra’s city limits.

Mobility

- As noted in the EIR, SCAG’s 2016 RTP/SCS Land Use Policies and Alhambra’s EECAP Implementation Policies, along with this General Plan Update, encourage the use of alternative modes of transportation for short trips. Public transportation options are currently very limited, especially in some parts of the city. Other alternative modes of transportation are almost nonexistent. The city should require that any needed mobility improvements for, or near an area under development, should be in place before any construction begins, demonstrating that planned mitigation measures would be successful. This would include any traffic mitigation measures needed, alternative transportation options, and public transportation.

- I suggest expansion of the Alhambra Community Transit system; additional lines to cover more of the geographic area of the city and increased hours and days of operation.

- I suggest the addition of a shuttle line, either ACT or Metro, along Fremont Avenue from an East Los Angeles Gold Line station to the South Pasadena Gold Line Station, giving residents additional extended public transportation options around and within Alhambra.

EIR, Impact T-1: “Traffic generated as a result of development facilitated by the Plan would degrade operations at 21 intersections to below identified significant thresholds. Because feasible mitigation is not available at 20 of 21 intersections, impacts would be significant and unavoidable.” Similar “significant and unavoidable” impacts would occur near I-10 off-ramps and the intersection of Valley Blvd. and Fremont Ave. “Significant and unavoidable” is not acceptable! Lessen or mitigate the significance of these impacts before any new project is approved! This is what the Plan should be doing, finding alternatives to “significant and unavoidable” impacts. It is avoidable if we don’t purposely worsen the problem.

- The Plan and EIR, as written, do not include additional traffic and congestion impacts that would be generated by potential development along and near the Fremont Ave. corridor. The
city has already given tentative approval for at least two major developments in this area, so this compounded impact should be included as part of the study and report.

Quality of Life

- Implementation Actions (QL5) suggest to “Revisit the linear park concept with Union Pacific and, if determined feasible, further investigate and pursue possible funding for construction of linear park over the railroad trench…” Rincon as much as admits that the linear park idea is not feasible, yet they still base much of their Plan on it. But I agree, IF at some point in the future, it looks like the idea is agreeable with Union Pacific, and the City has funds to do so, it might be worth further investigation.

- New development to generate job growth, and developments where people can live, work, and find food, entertainment and available transportation all in an inclusive community are themes repeated throughout the plan. However, no evidence or information is given in the Plan regarding the types of jobs that might be available to support these types of communities. Most mention is of commercial, retail, or hospitality jobs, but can these jobs support current housing prices in Alhambra, let alone new housing prices? The Plan lists current number of jobs by category, but there is no mention of how many of these workers live in Alhambra. There are also projected numbers of jobs by category, but with the types of jobs projected, will these future workers be able to afford to live in Alhambra? Do residents in current mixed-use housing developments in Alhambra actually work in offices or commercial/retail in or near their mixed-use community? Can a worker’s salary from the first-floor restaurant where s/he works pay the rent on a third-floor apartment in that building? Data in the Plan states that the median income in Alhambra is lower than the county average, but the housing costs in Alhambra are higher than the county average. This has huge implications in planning for a city’s growth, but it is not addressed at all in this Plan. It needs to be included.

My Conclusions

While this Plan may technically be considered an update to the current General Plan (updated wording and nomenclature, more recent data and statistics), it is depressingly weak in its content. Very few specifics are offered other than aesthetic suggestions to improve the “look” of the city- signage, streetscape design, bus shelters, etc. The specific suggestions that are presented, such as the linear park over the railroad trench and the East Valley Blvd.

Hospitality/Entertainment District, are either not feasible or would cause significant negative impact on the city. Compounded effects of major developments tentatively approved by the city are not included in the EIR, and there is no study of how future jobs and job growth within the city may, or may not, align with the housing market and availability. There are no plans of how to solve significant current problems of traffic congestion and the lack of affordable housing, and most of the realistic suggested Implementation Actions seem to be merely the natural continuation of policies under the current General Plan.

Of the Alternatives to the proposed project, according to the EIR, “No Project” would meet most of the same goals of the Update and would cause the least amount of negative impact to the city in the areas of population and housing and transportation and traffic. The “Relocated Focus Area” Alternative (Hotel/Hospitality District) might lessen the impact on one part of the city, but simply relocate it to another part, causing additional traffic flow from the I-10 to drive through the city to reach its destination. I found no traffic study of this option and there is still
no evidence that a project of this sort would be economically practical, considering competition in neighboring cities.

My recommendation would be for the City to adopt the No Project Alternative and simply continue to use the current General Plan as a guide until a complete and comprehensive General Plan can be written, which would also include the essential Housing Element. The proposed General Plan Update offers very little beyond the current General Plan. “No Project” would meet most of the goals of the suggested Plan, but would have less negative impact on population and housing and mobility issues. Delay the adoption of a General Plan Update until it can be fully integrated with the Housing Elements update to create a truly comprehensive and complete General Plan. We’ve waited this long for an update to the General Plan, we can wait a little longer to ensure that sure it’s done right.

Cliff Bender
2516 Midwickhill Dr.
Alhambra, CA 91803
cbender99@sbcglobal.net
8.10 Letter 10

COMMENTER: Cliff Bender, Alhambra resident

DATE: October 1, 2018

Response 10.1
The commenter expresses disappointment in the draft General Plan and suggests that it is not much different from the current General Plan. The commenter also suggests that the General Plan update should be delayed or that preparation of a new Housing Element should be advanced.

These comments are noted, but do not pertain to the Draft EIR. Although the draft General Plan includes new policy language for a variety of topics and incorporates new legal requirements, it is true that the land use map for the City contained in the draft General Plan is largely the same as the current map. As has been noted throughout the process, the draft General Plan does not conflict with the current Housing Element and, when the Housing Element is updated, the City will verify consistency of the update with other General Plan chapters/elements.

Specific comments are addressed in responses 10.2 through 10.19.

Response 10.2
The commenter suggests that with a comprehensive General Plan, existing specific plans should not be necessary.

The General Plan and specific plans serve different purposes. The General Plan is intended to provide broad, citywide policy direction, while specific plans are intended to provide much more specific direction with respect to land use, design, and other issues for a particular area of the City where the community.

Response 10.3
The commenter suggests that there are inconsistencies in the draft General Plan, noting a discrepancy regarding how much open space there is in the City.

City staff will review the draft General Plan again prior to submittal of the final draft to City decision makers in order to address any identified discrepancies. Such minor corrections would not change the overall policy direction of the General Plan.

Response 10.4
The commenter notes that the draft General Plan anticipates “normal” development along Fremont Avenue and suggests that two major developments in the City that have received tentative approval should be included in the General Plan and EIR.

It is true that the draft General Plan does not anticipate any specific changes to the character of or development allowed along the Fremont Avenue corridor. Developments that are currently being contemplated in the City are considered generally as part of the growth forecast for the City considered in the Draft EIR, but would be subject to their own project-level CEQA review to address any project-specific impacts. Growth forecasts in the Draft EIR are based on Southern California Association of Governments growth forecasts developed as part of the regional Sustainable
Communities Strategy/Regional Transportation Plan. Also, although it is not entirely clear to which projects the commenter is referring, but the Ratkovich project proposed along the Fremont Avenue corridor has not been granted any tentative approval from the City.

Response 10.5

The commenter believes that the fact that residences can be allowed in Industrial areas needs to be made more apparent and suggests that allowing residences in industrial areas should be avoided.

These suggestions are noted. The Industrial designation is not primarily aimed at accommodating residential uses, though residences may be allowed in certain circumstances. The draft General Plan policy of conditionally allowing residences in the Industrial designation is not a change from current City zoning. This is allowed only in instances where it has been aptly demonstrated that the proximity of residential and industrial uses will not create significant land use conflicts or hazardous conditions. The City retains the discretion to require conditions for residential development in Industrial areas to ensure the compatibility of uses.

Response 10.6

The commenter suggests that mobility issues should be addressed before any new development is approved in the City.

This opinion is noted. The City will continue to require developers to implement transportation system improvements needed to address the impacts of individual development projects. The draft General Plan Mobility chapter includes a range of policies aimed at improving circulation. Nevertheless, as noted in Section 4.12, Transportation/Traffic, of the Draft EIR, forecast growth through 2040 would have a significant and unavoidable impact to the local circulation system. This is largely due to the high levels of congestion already experienced in the City.

Response 10.7

The commenter states that residents in housing along Garfield Avenue may have difficulty finding new affordable housing if such housing is removed.

This concern is noted. Of course, individual residents may have difficulty finding replacement housing if their housing is removed or replaced. However, with respect to CEQA, the environmental issue relates to environmental impacts associated with the possible construction of replacement housing. Because the draft General Plan could accommodate more than enough new housing to replace any units that could be displaced, it would not create the potential for environmental impacts beyond those of the General Plan itself due to the construction of replacement housing.

Response 10.8

The commenter suggests that the Draft EIR states that the need for new parks is less than significant.

As required by CEQA, the analysis of recreation-related impacts actually focuses the potential environmental impacts of providing new parks, not impacts to parks. Based on several comments on the draft General Plan, the linear park concept has been removed from the General Plan. The 710 Freeway stub park concept will, however, remain. Removal of the linear park concept from the General Plan will further reduce options for providing potential additional parkland in the City, but a
number of options remain. The Draft EIR text has been revised to remove the linear park, but the environmental impact conclusion related to recreation has not changed.

Response 10.9
The commenter notes that the draft General Plan does not include projects to add lower or moderate income housing and suggests that converting non-residential properties to housing and mixed-use would reduce the number of units available to lower and moderate income households.

It is true that the draft General Plan, which does not include an updated Housing Element, does not include policies or projects that would specifically add lower or moderate income housing. Housing issues are addressed in the Housing Element, which will be updated in 2021. The land use map and policies contained in the draft General Plan would, however, continue to accommodate sufficient housing to meet the City’s RHNA allocation for lower and moderate income housing. It is not clear why the commenter believes that allowing residential or mixed use development in areas would reduce the supply of lower or moderate income housing, but it should be noted that residential and mixed use development is already allowed in certain non-residential areas under certain conditions so this policy is not new to the draft General Plan.

Response 10.10
The commenter questions whether strategy number 6 relates to a change in demand for housing or a change in the availability of housing.

The strategy relates to responding to changes in the housing types that individuals may be seeking in the future. For example, the strategy encourages cities to accommodate more multi-family housing if that is the type of housing for which there is unmet demand. The draft General Plan is consistent with this general concept.

Response 10.11
The commenter suggests that the East Valley Boulevard hospitality/entertainment district is not favored by the public, states various reasons that he objects to hotel development, and questions whether a new hotel is needed or would be successful.

The commenter’s skepticism regarding the desirability and feasibility of a hotel is noted. While some members of the public have expressed similar sentiments, others have been supportive of the idea.

An economic/market study conducted as part of the General Plan (The Natelson Dale Group, Inc. 2015) concludes that hotel development in the City could be viable, but this does not mean that a hotel is “needed.” The draft General Plan merely includes hotels as an allowed use in certain commercial designations, but the City would not develop a hotel and such a project would presumably move forward only if a private developer decided that it is economically viable and if a landowner decided to redevelop his/her property. The fact that other hotels are present in the area was known to The Natelson Dale Group, Inc. when they conducted their study.

Response 10.12
The commenter suggests that mobility improvements in the vicinity of future development projects should be in place before construction begins.

This opinion is noted, but does not pertain directly to the draft General Plan. The City requires developers to make necessary mobility and other infrastructure improvements in conjunction with
new development projects. Typically, needed improvements must be in place before project occupancy so that they are in place when the project is operational.

Response 10.13

The commenter suggests expansion of the Alhambra Community Transit System.

The Mobility chapter of the draft General Plan includes several policies aimed at improving the local transit system, including M-2B, M-2C, M-2D, and M2-E. These relate to improving infrastructure and services, improving system connectivity, creating transit stop amenities, and implementing first-mile/last-mile supportive measures.

Response 10.14

The commenter suggests the addition of a shuttle line along Fremont Avenue.

Although the draft General Plan does not include a specific policy regarding a shuttle line along Fremont Avenue, it includes a range of policies (discussed in Response 10.13) to enhance transit generally. Determination of which specific system improvements are of highest priority will involve future coordination between the City and transit providers.

Response 10.15

The commenter states an opinion that the draft General Plan’s significant and unavoidable transportation impacts are unacceptable.

The Mobility chapter includes general policy direction aimed at improving mobility in the City and addresses impacts related to increased traffic to the degree feasible. Nevertheless, as discussed in Section 4.12, Transportation/Traffic, of the Draft EIR, the impacts associated with forecast growth in Alhambra would be unavoidably significant. City decision-makers would need to adopt a statement of overriding considerations setting forth the reasons the draft General Plan’s benefits outweigh this significant impact if they elect to approve the General Plan. It should be noted that the impacts identified for the General Plan relate to growth forecast by the Southern California Association of Governments and that forecast growth under the draft General Plan is the same as what could potentially occur under the current General Plan.

Response 10.16

The commenter suggests that the draft General Plan and Draft EIR do not account for potential development along and near Fremont Avenue.

The draft General Plan sets forth the City’s vision for Alhambra’s development through 2040. The Draft EIR does not specifically discuss developments currently being contemplated, but does account for such development through consideration of growth forecast for the City through 2040. The vision for the area in question, which is designated Industrial, does not focus on residential development. However, the draft General Plan acknowledges that residential development may be allowed with a Conditional Use Permit under certain circumstances. The Draft EIR for the draft General Plan focuses on the overall intent of the draft General Plan and the level of growth/development expected to occur in accordance with that vision. As the commenter acknowledges, the specific development project in question is subject to its own CEQA review, which addresses the specific impacts associated with that proposal.
Response 10.17

The commenter suggests that the linear park concept is infeasible, but states that it might be worth further investigation in the future.

In response to a number of comments on the linear park concept, that feature has been removed from the General Plan. The City may re-visit that idea at some point in the future if it appears to be potentially feasible.

Response 10.18

The commenter states a concern about the affordability of housing for Alhambra workers.

Although economic considerations are not the subject of the Draft EIR, housing affordability in Alhambra is a concern as it is throughout the Los Angeles region. The Quality of Life chapter of the draft General Plan includes specific policies (e.g., policies QL-1B, QL-4A, and QL-4B) aimed at bringing in high wage jobs and the City will continue to work toward meetings its affordable housing goals through implementation of the current Housing Element. The mixed use and higher density multi-family residences that the General Plan would primarily accommodate are typically more affordable than single family residences. Nevertheless, housing costs remain a substantial concern.

Response 10.19

The commenter states that the draft General Plan offers few specifics regarding solving key issues and suggests not adopting a new General Plan until the Housing Element is also updated.

The General Plan is intended to provide general policy direction for the City rather than to provide specific solutions to every issue. Based on the general policy direction, it is anticipated that the City will develop specific solutions to issues over the life of the plan. The Mobility Element includes policies aimed at improving circulation while the existing Housing Element includes policies aimed at developing and maintaining affordable housing. Nevertheless, those two items remain significant challenges due to Alhambra’s location in a major metropolitan area with substantial traffic congestion and high housing prices. It is not clear why the commenter believes the draft General Plan would have a negative impact on mobility and housing prices. The draft General Plan would not accommodate more overall development than the current General Plan and it would continue to be supportive of current Housing Element policies and programs aimed at providing affordable housing.
Letter 11

Lam, Paul

From: Melissa <melmamichelson@gmail.com>
Sent: Monday, October 1, 2018 11:43 PM
To: Alhambra General Plan
Subject: public comment about D-EIR General Plan

Oct. 1, 2018

Dear City of Alhambra

Re: Draft EIR General Plan Vision 2040

I begin my comments and questions with general topics, but the 2nd half of this email focuses on the hotel.

- In all the community meetings, including the one from Sep. 11, residents were vehemently opposed to building a "linear park" on top of the Mission street train tracks. Residents as cited in the telephone survey results as well as at those meetings, want REAL parks with large shady trees, picnic tables, a skateboard park, tranquil spots to do Tai Chi -- not a rumbly snoggy overpass to the existing train.  

- A ‘tree master plan’ is referred to various places, -like Policy LU-8A - what is that? where can we read that plan? Please update the GP draft to include the new tree ordinance passed by the City Council in 2018.

- If the city wants to satisfy (Goal QL-3) "improve the City’s position as a destination for entertainment and overnight visits” why not transform the Victorian structure from at least 1888 at 403 S. Garfield into a Bed and Breakfast? It is within walking distance of downtown Alhambra Main/Garfield.

- We should **not be transitioning out aged multi family housing** as the General Plan proposes. That can be affordable housing as an alternative to the expensive condos. **403 S. Garfield** is currently multi-family housing and can and should be renovated. It is our heritage from at least 1888.
• Goal SI-12 is to provide a high-quality and consistently reliable telecommunications system accessible. We need the City to implement municipal internet as part of that. Currently, we only have two choices: Charter or ATT. With the removal of Internet Neutrality in this country, cities are looking at treating the Internet as a utility.

• We don't need Auto Row to grow. What is the statistical data for determining this need?

• The General Plan D-EIR suggests to "promote media-related and high-technology industries along Palm Avenue, and transition select areas to a mix of industrial, office, retail, and residential uses." As of over a year, there’s already been an EIR developed for the mega-development of condos and apartments in the Braun "Alhambra" facility, but the General Plan D-EIR does not mention this or include any data from it. It basically pretends like it doesn’t exist. It uses outdated information in this area, as well as other areas in the D-EIR (see below about the hotel), and should incorporate the information from the D-EIR of the development into the General Plan's D-EIR.

• The Draft EIR does not support the need for another hotel in the City of Alhambra and therefore it needs to be removed. Missing from the D-EIR is analysis that would anticipate the many new hotel developments that have already broken ground just a few blocks from Alhambra’s "border," which when included in the numerical analysis would severely depress the projected occupancy rate. Lacking this accurate and current data, including at least over a thousand new rooms being currently built in the area or already built since 2014 when the D-EIR data stops, Alhambra will be forced to sustain a hotel glut for decades to come, and therefore I demand that mention of a hotel be removed from the current General Plan.

Questions About the Hotel:

The proposal to build a hotel is neither one that surveyed residents want or feel are necessary nor one that the Draft Environmental Impact Report (D-EIR) for the General Plan proves is necessary.

Questions about location:

1. In Table 1.1 "Land Usage" in the D-EIR suggests that 8.33 acres would be needed to build a 250-room hotel. What location is available currently or being looked at for demolition for such a construction? The GP calls Alhambra a 'built-out' community. So there is therefore no empty space right now.

2. In another section of the D-EIR, the General Plan suggests that on the three-mile long Valley Boulevard, "West Valley businesses that cater to the City's large Asian population would have the capacity to support a hotel." What businesses exactly would have the capacity? What is that 'capacity' (in #s of shoppers) and which businesses (please list all, as well as their annual consumer use that would require overnight stays)?
3. The Plan also refers to "Several major Asian bank headquarters" are in a supposed "Financial District". How many, which ones, how big are they, and how many employees do those branches employ that would need overnight accommodation?

4. The language describing the 'financial district' was copied from the City's site: http://www.cityofalhambra.org/page/355/valley_boulevard_corridor/ Where does this area begin and end exactly? How many financial enterprises does it include?

**Questions about the absent supporting data to build a hotel:**

1. Why would a hotel need to be built a few blocks from the 222-room Hilton San Gabriel?

2. Why would a hotel need to be built a few blocks from the 288-room Sheraton San Gabriel and the Hyatt (being built now) just 10 blocks away across from the AMC theaters on Atlantic and Heilman?

3. What data is present in the D-EIR that demonstrates the 10 existing hotels in Alhambra (http://www.cityofalhambra.org/page/193/hotel_motel_accommodations/) cannot accommodate tourists to Alhambra?

4. How many tourists come to Alhambra annually? What is the occupancy/vacancy rate of the current hotels?

**Outdated and lacking data conflicts with support to build hotel:**

Please conduct a more contemporary analysis for 2018, or remove the hotel idea until there is sound, valid data.

I am not referring to market-share "Catch up' demand that Alhambra may be able to do compared to the neighboring city's building of hotels or based on recapturing possible future market demand nor do I refer to an "Incremental demand", representing Alhambra's "fair share" of future hotel demand within the overall West SGV hotel market. This kind of demand is based on market share projections and not actual real or projected occupancies or hotel vacancys in Alhambra or in the area, because the D-EIR uses 5 cities as a comparison and stops at 2014. There are now 4 mega-hotels built or being built within the 1-mile radius of the target location in Alhambra that's mentioned in the D-EIR. In the D-EIR, the real data number of hotel rooms in the San Gabriel Valley and the percentage of occupancy levels in the four cities stops at 2014 and then continues with projections into 2035, so this data is invalid to support the rationale for building another hotel.

The D-EIR projects the demand through to 2035, while failing to project the supply beyond 2014. The actual data stops at 2014 in Table C-1: "Potential Demand for New Hotel Development in SGV..." It shows that in 2014, there was a 20% vacancy in all four cities in the 967 reported rooms. However, in reality, with the four nearby mega-hotels (Sheraton, Hyatt, Hilton, Marriott: refer to this article July 2017 https://www.sgvtribune.com/2017/07/23/4-new-san-gabriel-valley-hotels-set-their-sights-on-chinese-tourists/ being built or recently completed, if we take the Sheraton at 288 rooms and assume the others are similarly sized, that would bring in approximately 1152 rooms added to the local hotel inventory in the 4-city zone. The data in the D-EIR is outdated and does not reflect what is current.

Furthermore, using the table's own Room Demand estimate for 2020 (301,693 room-days in a year), the above-mentioned 1152 new rooms added to Smith Travel Research's estimate from back in 2014 of 967 rooms, it would result in about 2118 (967 rooms + 1152 rooms) to the area (which yields 773,435 room-days available in a year).

According to the statements made in the D-EIR from the Smith Travel Research, when the overall occupancy rate exceeds 70%, then there is sufficient demand to support adding additional room inventory.
Using that logic, then, according to the more accurate contemporary calculations above, which include the four mega-hotels in the area, the overall occupancy rate drops to 39%, thus resulting in a hotel-room glut according to the referenced projections into the year 2035. 70% seems to be the rationale for building hotels, but the reality is that currently the actual rate is 39% and thus a hotel should NOT be built.

Questions about the lack of Alhambra resident and tax-payer interest in building a new hotel

I do not see any information in the 928-page appendix, nor the D-EIR itself, is there information about residents’ desire for a new hotel, so where is this idea coming from?

1. In 2013, according to Table A-2, Alhambra had 83,778 residents. For the purposes of the General Plan, only 400 Alhambrans were called. 360 people submitted open-ended written surveys stated on the survey results because they were self-selected rather than randomly selected, they are not considered statistically reliable. What data about Alhambran’s preferences is statistically reliable in the D-EIR as it relates to the hotel in particular? 400 is only 0.5% of the Alhambra population?

2. 50% (200) on the telephone survey when asked about hotels, felt we have too many or about the right number of hotels in Alhambra. Why isn’t that referred to? Where is this idea of building a hotel coming from if people don’t think it’s needed?

3. Is building a 250-room hotel conducive to the top 2 responses from telephone surveyed residents that it appreciates its parks and Alhambra’s small-town feel? If so, how?

4. Where is the qualitative data collected from the several community input sessions at the library over the last few years of over 200 participants? Where are the notes written down on the poster boards that the consultants happily jotted down when they heard residents make suggestions? How many times did they write down “hotel”?

5. How many Alhambrans actually see a need for a hotel in Alhambra’s city limits?

6. At the Sep. 11, 2018 meeting, the consultant told the audience that an economist suggested a hotel. What is the name of the economist, and were we see his/her data?

7. Table D-5 in the D-EIR compares the taxes collected historically from the neighboring cities. What, if any, is Alhambra’s budget shortfall is, compared to other cities?

8. What does Alhambra spend its $141 million annual revenue on (2017-2018)?

9. How much will an actual occupancy rate taking the current hotels in the area into account (for example, 38%) bring to the City and how much will it cost the city to prepare for and build a new hotel?

10. What data proves that the transient tax income is worth the impact upon the city?

11. What is the actual occupancy-vacancy rate?

I look forward to getting clarification to my questions and concerns before the final draft of the EIR goes before the City Council.

Sincerely,

Melissa Michelson

Alhambra resident
8.11 Letter 11

COMMENTER: Melissa Michelson, Alhambra resident

DATE: October 1, 2018

Response 11.1

The commenter states that the community is against the linear park concept and that the community wants “real” parks.

In response to this and other concerns, the linear park concept has been removed. Although options for other parks in the City are limited, the draft General Plan includes a range of ideas for providing new parks and recreational opportunities.

Response 11.2

The commenter asks about the City’s tree master plan and suggests that the new tree ordinance should be included in the General Plan.

The tree master plan is a Public Works Department document related to street tree maintenance. A reference to the newly adopted tree ordinance has been added to the final General Plan.

Response 11.3

The commenter suggests converting a Victorian structure at 403 S. Garfield Avenue into a bed and breakfast.

This suggestion is noted and will be considered by City decision makers as they review the draft General Plan. That site is currently designated Office Professional under the draft General Plan (similar to the current General Plan designation). This designation does not accommodate hotels, but the General Commercial designation does. Height and massing restrictions for these two designations are similar.

Response 11.4

The commenter suggests that aging multi-family housing should not be phased out and states that the building at 403 S. Garfield should be renovated.

This comment is noted. The only area where the draft General Plan envisions potential gradual phase out of the multi-family residential development is along the portion of Garfield Avenue where the Medical Office designation is proposed. This area does not include 403 S. Garfield Avenue. There is nothing to prevent the owner of that property from renovating the existing building.

Response 11.5

The commenter notes that internet service should be treated as a utility and suggests that the City should implement municipal internet.

City staff have not suggested the development of municipal internet service. This comment does not pertain to the Draft EIR.
Responses to Comments on the Draft EIR

Response 11.6
The commenter states an opinion that the Auto Row does not need to grow.

Certainly, the Auto Row does not “need” to grow. An economic/market study conducted in conjunction with the preparation of the draft General Plan (The Natelson Dale Group, Inc. 2015) concludes that demand for auto sales will grow gradually over the life of the General Plan. Based on this conclusion, the draft General Plan accommodates limited managed growth of auto sales through 2040.

Response 11.7
The commenter suggests that the draft General Plan ignores the Braun Alhambran facility that has been proposed.

The draft General Plan sets forth the City’s vision for Alhambra’s development through 2040. The vision for the area in question, which is designated Industrial, does not focus on residential development. However, the draft General Plan acknowledges that residential development may be allowed with a Conditional Use Permit under certain circumstances. The Draft EIR for the draft General Plan focuses on the overall intent of the draft General Plan and the level of growth/development expected to occur in accordance with that vision. As the commenter acknowledges, the specific development project in question is subject to its own CEQA review, which addresses the specific impacts associated with that proposal.

Response 11.8
The commenter suggests that the Draft EIR analysis does not consider other hotels being developed in the area and that the Draft EIR does not support the need for another hotel.

It is not the EIR’s purpose to determine the feasibility of any particular use (including hotels) or to justify inclusion of any particular use in the draft General Plan. The EIR’s purpose is merely to identify the potential environmental impacts that may result from implementation of the draft General Plan.

As noted above, an economic/market study conducted as part of the General Plan preparation concludes that the City could likely accommodate limited hotel development. The preparer of this study was aware of other hotel proposals/developments in the area. That said, there is no “need” for new hotels in Alhambra. City decision makers will consider the hotel issue as they review the draft General Plan and make a final determination regarding whether hotels are desirable.

Response 11.9
The commenter suggests that residents do not want a hotel and that the Draft EIR does not demonstrate the need for one.

The opinion is noted. Some commenters have stated that they do not support the idea of allowing hotels, but others have expressed support for the idea. As noted in Response 11.8, it is not the EIR’s purpose to justify accommodation of hotels in the City. A hotel is not “needed.” City decision makers will need to decide whether accommodating hotels is desirable.

Response 11.10
The commenter asks where a hotel could be accommodated since the City is built out.
As with any development in Alhambra, a new hotel would involve redevelopment of an already developed property so would entail demolition or reuse of existing structure(s). Any redevelopment would be initiated by a private developer and would be at the discretion of the property owner. The draft General Plan would only accommodate such development.

Response 11.11

The commenter questions whether Valley Boulevard has the capacity to accommodate hotels.

The commenter misunderstands the meaning of the statements in the draft General Plan. The statement regarding capacity merely means that properties along the eastern end of Valley Boulevard in the City have the physical capacity to accommodate hotels. As noted previously, a market study indicates that hotel development in the City would likely be viable, but this does not mean that the City “needs” hotels. City decision makers will make a final determination of whether allowing hotels is desirable.

Response 11.12

The commenter requests data regarding major Asian bank headquarters in the area.

The requested data is not readily available, but as noted in previous responses, a market study prepared in conjunction with the draft General Plan concludes that Alhambra could support additional hotels.

Response 11.13

The commenter again questions whether hotels are “needed” and requests data regarding tourists.

Again, neither the draft General Plan nor the Draft EIR suggest that hotels are “needed,” though a market analysis conducted in conjunction with the draft General Plan suggests that the local economy could support hotels. The preparer of that analysis (The Natelson Dale Group, Inc.) considered overall demand for hotel rooms as well as the current supply of hotel rooms in the area. Other cities in the area are attempting to attract Asian tourists (see https://www.sgvtribune.com/2017/07/23/4-new-san-gabriel-valley-hotels-set-their-sights-on-chinese-tourists/) and one of the purposes behind providing hotels in Alhambra would be to try to capture some of those tourist dollars. However, this is an option for the City, not a need.

Response 11.14

The commenter reiterates concerns about the viability of hotels in Alhambra.

The concerns about the viability of hotels are addressed in previous responses. It should be noted that it is not the Draft EIR’s purpose to justify any particular land use. Rather, the Draft EIR’s purpose is to study the possible environmental effects of the land uses considered in the draft General Plan.

Response 11.15

The commenter reiterates a number of questions about the viability of hotels, poses questions about City revenues and expenditures, and suggests that the community does not see the need for a hotel.
Please see previous responses regarding the viability of hotels. As previously noted, the market study prepared in conjunction with the draft General Plan was prepared by The Natelson Dale Group, Inc. The study is available for review in Appendix C of the Draft EIR.

Responses to the community survey conducted in conjunction with the draft General Plan indicated that 43.3 percent of Alhambra residents believe the City has too few hotels, 50.3 percent believes the number of hotels is about right, and 6.4 percent believe the City as too many hotels. While this indicates that the majority of residents do not believe new hotels are needed, the only land uses for which residents more strongly felt more is needed are entertainment uses (65.7 percent) and retail stores (44.1 percent).

Alhambra’s General Fund revenues and expenditures are shown on figures 15 and 16 of the draft General Plan. The largest expenditures are for police (42 percent), fire (27 percent), and community services (10 percent). There is no evidence to “prove” that transient income tax is worth its impact upon the City. This is a value judgment that cannot be “proven.” As for the question about the occupancy rate, calodging.com suggests that hotel occupancy in the San Gabriel Valley was about 79 percent in 2016. (https://www.calodging.com/images/uploads/general/LAMay%20ETrends.pdf)
Letter 12

Alhambra Preservation Group

www.AlhambraPreservation.org
(626) 755-3467

October 3, 2018

Community Development Department
Attention: Vanessa Reynoso, Deputy Director of Community Development
City of Alhambra
111 South 1st Street
Alhambra, CA 91801

SUBJECT: ALHAMBRA PRESERVATION GROUP RESPONSE TO THE DRAFT ALHAMBRA GENERAL PLAN, DRAFT ENVIRONMENTAL IMPACT REPORT AND RELATED IMPLEMENTATION ACTIONS FOR THE DRAFT GENERAL PLAN

Dear Ms. Reynoso,

On behalf of Alhambra Preservation Group, we are submitting these timely comments in response to the City of Alhambra’s draft General Plan, draft Environmental Impact Report (EIR) and Implementation Actions for the General Plan released for public review in August.

As you may be aware, Alhambra Preservation Group (APG) is an Alhambra-based non-profit organization committed to the protection and preservation of historical, architectural and cultural resources in Alhambra. APG’s mission is to ensure that the historical, architectural and cultural resources of our city are identified, protected and celebrated for their contributions to Alhambra’s heritage, economy and environment.

Overview

APG is pleased that the preservation of historical, architectural and cultural resources and the need for a comprehensive historic preservation program is finally included in the public discourse here in Alhambra.

APG is pleased to see a listing of historic neighborhoods in the Land Use and Community Design section of the report.

The goals and policies stated in both the Land Use and Community Design and the Cultural Resources sections of the draft General Plan include goals that attempt to preserve Alhambra’s historical, architectural and cultural resources but only in general, non-actionable terms.
The draft EIR identifies potentially designated historic districts and properties. It also includes recommended goals, policies and implementation actions that have the potential to guide the City of Alhambra towards the development and implementation of a comprehensive historic preservation program.

However, the Alhambra Preservation Group finds the City of Alhambra’s draft General Plan, and related Implementation Actions for the General Plan deficient in specific, tangible elements, policies and goals required to guide Alhambra towards the adoption of a comprehensive historic preservation program.

We are very dissatisfied with the tepid policies and goals in the draft General Plan and Implementation Actions for the General Plan. Namely:

- Alhambra’s failure to include a separate Preservation Element in the draft General Plan, despite requests from Alhambra residents to do so, demonstrates a disregard for the voices of Alhambra’s citizens regarding a comprehensive historic preservation program.

- The inconsistencies, errors and omissions throughout the three documents suggest city leaders’ lack of awareness, or disregard for, Alhambra’s significant history.

- The failure by the draft General Plan, draft EIR and Implementation Action for the General Plan to acknowledge the need for a citywide survey of Alhambra’s historical, architectural and cultural resources invalidates the draft EIR and its impacts.

- The non-committal language in the proposed policies and goals of the draft General Plan and Implementation Actions for the General Plan paired with the removal of vital implementation actions in the Implementation Actions for the General Plan recommended by the draft EIR demonstrates a deliberate effort by Alhambra’s leaders to weaken the implementation of a comprehensive historic preservation program.

- The ineffectual language in the draft General Plan provides city leaders with an “easy out” to reject and dismiss the establishment of a local regulatory framework for the designation and protection of significant historic and cultural resources.

In reviewing Alhambra’s draft General Plan as it relates to historic preservation, APG compared Alhambra’s draft General Plan to General Plans from three surrounding cities (San Gabriel, Arcadia and South Pasadena) with similar demographics. All three of these cities include either a dedicated preservation element or cultural resources section in their General Plans and utilize language that demonstrates an appreciation for and a firm commitment to protect their historical, architectural and cultural resources. Alhambra’s draft General Plan goals and policies related to historic preservation are impotent and devalue Alhambra’s architectural diversity and noteworthy history.

The Alhambra Preservation Group believes that the goals and policies in the draft General Plan need to be strengthened and obligate the City of Alhambra, unequivocally, to develop and implement a comprehensive historic preservation program.
To that end, Alhambra Preservation Group's response focuses on these six key areas:

1. Background and history
2. Alhambra’s need for a citywide survey of historical, architectural and cultural resources and a historic preservation ordinance.
3. The impacts of the city's negligence in not conducting a citywide survey of its historical, architectural and cultural resources and not adopting a historic preservation ordinance.
4. Recommendations for strengthening Alhambra’s draft General Plan goals and policies regarding historic preservation to reflect the opinions expressed by a majority of surveyed Alhambrians.
5. Mistakes, omissions, and discrepancies in Alhambra’s draft General Plan, draft EIR and Implementation Actions for the General Plan.
6. Questions created by Alhambra’s draft General Plan, draft EIR and Implementation Actions for the General Plan.

1. Background and History

Alhambra Preservation Group was founded in 2003 by a group of citizens concerned about the razing of historically significant homes. To educate Alhambrians about the historical and architectural significance of Alhambra’s many homes, APG hosted five successful home tours in 2004, 2005, 2006, 2011 and 2013. It has hosted countless workshops and educational talks and pioneered a "Meet the Candidates" Forum in 2006. Our Heritage Award program has honored more than 25 historic homes, and in 2016, APG conducted a windshield survey of Alhambra’s historic structures, which resulted in an interactive online map of Alhambra’s architecture.

Throughout its history, APG has met with and lobbied city council members regarding the need for a citywide survey and historic preservation ordinance. APG representatives have participated in Alhambra’s strategic planning meetings, made informational presentations at city council meetings, and presented city leaders with educational materials. In May 2015 more than 100 Alhambrians attended a city council meeting to "Stand Up for Preservation."

Unfortunately, city leaders have ignored demands for historic preservation policies for decades and have demonstrated a clear disregard for the wishes and opinions of Alhambra’s residents.

When Alhambra began updating its General Plan in 2015, Alhambra Preservation Group vigorously participated in the process. APG members attended all community meetings and participated in the survey that the city conducted to solicit input from residents. APG was present at community meetings and heard the residents of Alhambra express their voices in strong support for a citywide survey of historic structures, adoption of a preservation ordinance, creation of a historic resources commission and establishment of an incentives program.

When the results of that survey were released in late 2015, the key findings echoed those voices, stating:

- "The citizens of Alhambra prioritize historic preservation of old homes and buildings."

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12.5 Cont.

- "52% of those surveyed indicated that preserving historic areas and buildings in the City was a priority."

The final survey report prepared by Veronica Tam and Associates in December 2015 stated in the introduction that, "Community input is essential in creating the vision for the Alhambra General Update."

In the accompanying survey report prepared by True North Research, Inc., the introduction states,

"Like all cities in California, the City of Alhambra relies on its General Plan to guide decisions with respect to land use, development and related policy matters. Often referred to as a ‘blueprint’ for achieving residents’ vision for the future, the General Plan addresses a variety of topics that affect the quality of life in the City, including circulation, community design, conservation and open space, land use, safety, parks and recreation, and sustainability."

APG members and Alhambra residents participated in the survey and community outreach process with the understanding that the community’s voices regarding the historic preservation would be acknowledged and respected in this process. However, based on the City’s proposed General Plan, it’s clear these voices have been ignored.

As the draft General Plan moved through its development and draft EIR phase, APG reached out to the City of Alhambra to advocate for the development of a comprehensive historic preservation program. In late 2016 and early 2017, APG met with newly elected City Councilmember Jeff Maloney and interim Community Development Services Director Marc Castagnola to advocate for its development. In the summer of 2017, Councilmember Jeff Maloney announced at APG’s summer event Coffee with a Councilmember that the City of Alhambra would pursue the adoption of a historic preservation ordinance. Soon after, APG met with Mr. Castagnola, and he outlined the concrete steps Alhambra would take to develop this. In December 2017 the City hosted a historic preservation community meeting where attendees provided input into what elements should be included. Following that meeting, both Mr. Castagnola and Councilman Maloney reached out to Marcello Vavala of the LA Conservancy to discuss the various elements of a comprehensive historic preservation program.

With so much movement and coordination between APG and the City taking place, APG believed that the draft General Plan would include concrete policies and tangible goals to guide the City of Alhambra towards those efforts.

Instead, the draft General Plan includes weak, nebulous and ultimately empty language and does not include a single goal or policy related to the need for a citywide historic resources survey. The implementation Actions for the General Plan removes important and specific recommendations included in the draft EIR related to (1) the need for a citywide historic resources survey, (2) the establishment of a Cultural Resources Commission, and (3) the recommendation that the City of Alhambra apply for designation as a Certified Local Government. This is unacceptable.
APG supports the five implementation actions (R-4 – R-8) listed on pages 94 and 95 of the draft EIR. Those specific and concrete implementation actions need to be included in Alhambra's final General Plan and Implementation Actions for the General Plan.

2. Alhambra's Need for a Citywide Survey and Historic Preservation Ordinance

Alhambra has never conducted a citywide survey of historical, architectural and cultural resources; therefore, Alhambra has no baseline listing of these resources. The completion of a citywide inventory of historical, architectural and cultural resources needs to be the first policy adopted by the City of Alhambra in regards to its historic preservation program and the draft General Plan needs to be amended to include a related policy.

The draft Environmental Impact Report for Alhambra's General Plan is incorrect in stating in Section 4.3.1.b. that "A number of previous cultural resources investigations have been completed in Alhambra, including a citywide historic resources survey conducted in the 1980s."

This is incorrect. A citywide historic resources survey was not conducted in the 1980s.

In 1984 the City of Alhambra used $15,000 in grant funding from the California Office of Historic Preservation to hire Johnson Huemann Research Associates to conduct an inventory of historic structures in two neighborhoods, the Ramona Park Tract in southern Alhambra and the Wuest Tract in northwestern Alhambra. Hundreds of residences in these two neighborhoods were documented. Additionally, the City of Alhambra, the Alhambra Historical Society and the hired consultants selected 34 at-large sites to be inventoried. The 1984-85 Alhambra Historic and Cultural Resources Survey focused solely on structures built prior to World War II. Thirty-four years have now passed since Alhambra's last survey, which means that homes and structures built through 1968 now pass the 50-year threshold and may be eligible for historic evaluation.

The Alhambra Preservation Group believes this erroneous statement – that a citywide historic resources survey was conducted in the 1980s – invalidates the entire section of the draft EIR that addresses the impact of the draft General Plan on Alhambra's historical resources. This section needs to be re-written acknowledging that there has never been a citywide survey conducted in Alhambra. The draft EIR needs to explore the cumulative impacts of Alhambra's draft General Plan from that baseline.

Because a citywide survey of Alhambra's historical, architectural and cultural resources has never been conducted and the impact that new homes and development could have on those resources is unknown, Alhambra needs to place a moratorium on the razing of buildings. Alhambra also needs to make the completion of a citywide survey and adoption of a historic preservation ordinance an immediate priority.

Policy R-8F in the Cultural Resources Section of the draft Alhambra General Plan states: "Investigate the possible establishment of a local regulatory framework for the designation and protection of significant historic and cultural resources." Policy R-8F is a feasible attempt by the City of Alhambra to include a policy related to the adoption of a historic preservation ordinance in its General Plan. This policy is inadequate in ensuring that Alhambra enacts legislation to preserve and protect its cultural, architectural and historical resources. It commits the City of Alhambra to
do nothing towards the adoption of a historic preservation ordinance. The language in this policy needs to be strengthened to reflect the adamant voices of 52% of surveyed Alhambrans who feel that the preservation of our city's historic resources needs to be prioritized.

The draft EIR states on page 92 that:

"Although the City of Alhambra does not have a historic preservation ordinance, Chapter 23.44.040, Residential Design Standards in the Alhambra Municipal Code, states that a property in an area 'designated as having historic and cultural significance in the Historic and Cultural Resources Survey shall be designed and constructed to reflect the neighborhood theme (through the use of horizontal shiplap siding or wood shake, mission tile, or concrete tile roof materials)."

Alhambra's current Residential Design Standards only serve to provide voluntary design guidelines for residents wishing to (1) make modifications to their home or (2) build a new home. These Residential Design Standards do not protect or preserve current historically, architecturally or culturally significant homes. Without a historic preservation ordinance, it is incorrect to state that present homes are protected. They are not. It is a well-known fact that many historic single-family residences continue to violate Alhambra's Residential Design Standards as they contain no consequences for residents who don't adhere to them.

APG and a significant number of Alhambrans want to understand Alhambra's resources and their historical, architectural and/or cultural significance to our city, the state of California and our nation as a whole. A citywide survey conducted to identify Alhambra's historical, architectural and cultural resources would achieve that and unequivocal language to that effect must be included in Alhambra's General Plan.

3. Impact of Alhambra's Negligence in Not Conducting a Citywide Survey of Historical, Architectural and Cultural Resources and Not Adopting a Historic Preservation Ordinance

The City of Alhambra's failure to conduct a citywide survey of historical, architectural and cultural resources and to adopt a historic preservation ordinance has negatively impacted Alhambra's resources.

As previously stated, in 1984-85 the City of Alhambra conducted the Alhambra Historic and Cultural Resources Survey, which inventoried two neighborhoods and 24 at-large sites. This survey included 637 buildings and community design features in the final inventory with 36 buildings evaluated as potentially eligible for listing on the National Register of Historic Places and/or potentially eligible as a contributor to a historic district. This 1984-85 partial survey also identified several additional neighborhoods of merit and well over 100 additionally potentially significant sites eligible for either local, state or national landmark consideration.

The 1984-85 partial survey identified 17 sites as potentially eligible for listing on the National Register of Historic Places. The current status of those 17 sites is as follows:

<table>
<thead>
<tr>
<th>Building/Home Location</th>
<th>Current Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1801 South 4th Street</td>
<td>Still standing but significantly modified</td>
</tr>
</tbody>
</table>
As indicated above, five of the sites listed as potentially eligible for listing on the National Register of Historic Places have been destroyed and two (the 1924 Egyptian Theater building and the home at 1601 South 4th Street) have been so significantly modified that they no longer qualify for the NRHP.

The 1984-85 partial survey concludes with a listing of 109 public buildings, homes, community design features, educational, religious, institutional, commercial and industrial buildings, apartments, single-family residences and neighborhoods identified for further surveys. The full listing is in Appendix A.

Of those buildings listed in Appendix A, APG has been able to identify 20 that have been destroyed. This list in Appendix A was hardly comprehensive and it only identified buildings constructed prior to World War II. It contained some important structures but failed to include many others.

The City's of Alhambra's negligence in not conducting a citywide survey and adopting legislation to protect its historical, architectural and cultural resources enabled the loss of these resources. APG finds this unacceptable.

The future negative impacts of Alhambra having no citywide survey of historical, architectural and cultural resources could be substantial.

In 2016, APG conducted an unofficial windshield survey of Alhambra and identified several hundred residences, commercial buildings, churches and schools of significance using a 50-year threshold, i.e. structures built prior to 1966.

The following is a list of just a few of the sites that will be negatively impacted in the future if the City of Alhambra does not conduct an immediate citywide survey and adopt a historic preservation ordinance that preserves and protects its identified resources:

<table>
<thead>
<tr>
<th>Address</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>801 East Alhambra Road</td>
<td>Standing</td>
</tr>
<tr>
<td>601 East Alhambra Road</td>
<td>Standing</td>
</tr>
<tr>
<td>9 North Almansor Street</td>
<td>Standing</td>
</tr>
<tr>
<td>509 North Atlantic Blvd.</td>
<td>Standing</td>
</tr>
<tr>
<td>50 South Palmdale</td>
<td>Standing</td>
</tr>
<tr>
<td>1-93 E. Valley Blvd.</td>
<td>Standing</td>
</tr>
<tr>
<td>9 East Grand Blvd.</td>
<td>Standing</td>
</tr>
<tr>
<td>601 East Main Street</td>
<td>Standing</td>
</tr>
<tr>
<td>1700 Grandview Drive</td>
<td>Standing</td>
</tr>
<tr>
<td>12-20 South Mariposa</td>
<td>Standing</td>
</tr>
<tr>
<td>111 North Stoneman</td>
<td>Standing</td>
</tr>
<tr>
<td>2nd South 27th Street</td>
<td>Standing</td>
</tr>
<tr>
<td>1215 South 6th Street</td>
<td>Standing</td>
</tr>
<tr>
<td>612 North Avenue</td>
<td>Standing</td>
</tr>
<tr>
<td>639 North Bussinall Avenue</td>
<td>Standing</td>
</tr>
</tbody>
</table>
**Victorian Home at 403 South Garfield** — This two-story Victorian home was built circa 1885. It is one of the oldest homes in Alhambra and is one of Alhambra's last remaining examples of Queen Anne Victorian architecture. This Victorian home needs to be identified and celebrated as a local landmark. It is of the same era as the homes in the 200 block of East Beacon Street, which are listed in the draft EIR as a potential historic district. The site of this home is currently for sale and is being advertised as a potential site for a medical office building. It is at risk of being razed.

**Crawford's Corner** — Crawford's Corner is a retail shopping center located at the northwest corner of Valley Boulevard and New Avenue. It is located in the area of Valley Boulevard that the City of Alhambra has identified as a future potential entertainment center in its current draft General Plan. Crawford's Corner was built in the early 1960s and was opened in 1964. The architecture of Crawford's Corner is significant both for its ability to convey the principals of mid-twentieth century storefront design, as well as the Western theme that was utilized as part of their marketing plan. Covered walkways, false front parapet walls, elaborate turned wood detailing and rustic signage all expressed an Old West Style. It is an excellent example of vernacular architecture. Crawford's Corner has never been identified and recognized for its architectural significance. Because of this and its location, Crawford's Corner is in jeopardy and is at risk of being razed.

**Clyde Forsythe's Home (Orange Blossom Manor) and Norman Rockwell's Studio** — The Mid-Atlantic Colonial Revival-styled home at 520 North Almansor Street was designed by Alhambra architect Scott Quinn and built in 1923 for the prominent artist and illustrator Victor Clyde Forsythe. Clyde and Cotta Forsythe lived in this home, which they named Orange Blossom Manor, during the early 20th century and were part of a colony of artists who lived in Alhambra on Champion Place. Renowned American artist Norman Rockwell often wintered in Alhambra and painted in the second story garage studio of the Forsythe home. While this home is located in Alhambra's Lindaraxa Park Tract and is not currently in jeopardy, Alhambra has no laws protecting this historically significant residence from destruction.

**Mark Keppel High School** — Mark Keppel High School, located at 501 East Hollman Avenue in Alhambra, was designed and built in the Streamline Moderne style, a variant of the earlier Art Deco style. Mark Keppel High School was finished in 1939 and is an exceptional example of the Streamline Moderne style. Additionally, famed muralist Millard Sheets created a series of three exterior murals on Mark Keppel High School. Mr. Sheets received national and international recognition for his painting, and was recognized in Southern California as the leading figure and driving force behind the Californite Style watercolor movement. Because it was built in 1939, Mark Keppel High School is scheduled to be razed. However, this significant historical structure should be identified and protected.
Keppel High School did not meet the 50-year threshold when the 1984 survey was completed; however, it now meets the required 50-year threshold. While MKHS is not currently in jeopardy, Alhambra has no laws protecting this historically and architecturally significant school from destruction.

**Homes, Commercial Buildings, Schools and Churches Built in Alhambra Between 1934 and 1968** – Alhambra has a significant number of homes and structures built between 1934 and 1968 that have never been surveyed or evaluated. Figure 6 in the draft General Plan identifies Alhambra’s neighborhoods; however, the Ramona Park Tract and the Wuest Tract are the only two tracts inventoried in the 1984-85 partial survey. The other remaining 25 neighborhoods feature homes and structures built between the 1850s and 1960s with architectural styles including Victorian, Arts and Crafts, Colonial Revival, Art Deco, Spanish, and Mid-Century Modern. In fact, APG identified more than 20 architectural styles and sub-styles in its 1986 windshield survey, making the claim that Alhambra is one of the most architecturally diverse cities in the County of Los Angeles.

Ultimately, without a citywide survey and historic preservation ordinance that would identify, protect and preserve Alhambra’s historical, architectural and cultural resources, **every single historically, architecturally or culturally significant home, business, school, or church in Alhambra is in jeopardy.**

4. **Recommendations for strengthening Alhambra’s draft General Plan goals and policies related to historic preservation**

The policies set forth in Goal R-6 of Alhambra’s draft General Plan are weak and ineffectual. APG recommends modifying Goal R-6 and its related policies to strengthen it.

Goal R-6 in the draft General Plan states:

"Preservation of the cultural identity of Alhambra as a diverse residential and commercial city with distinct single-family neighborhoods."

Modify the language of Goal R-6 as follows:

Preservation of the historical, architectural and cultural identity of Alhambra as a diverse residential and commercial city with distinct single-family neighborhoods.

**Current Policy R-6A states:**

"Promote and encourage the preservation of Alhambra’s significant historic, cultural, archaeological, and paleontological resources."

**Modify Policy R-6A to:**

Promote and encourage the preservation of Alhambra’s significant historic, architectural, cultural, archaeological, and paleontological resources.

**Current Policy R-6B states:**

"Promote the formation and maintenance of neighborhood associations to foster neighborhood preservation."

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Modify Policy R-6B to: Promote and maintain the unique history and architectural character by establishing neighborhood associations.

Current Policy R-6C states: "Promote and maintain the unique history and architectural character of individual neighborhoods."

Modify Policy R-6C to read: No modification needed. This policy is acceptable.

Current Policy R-6D states: "Develop and implement design standards that maintain the character of established residential neighborhoods, as discussed in the Land Use and Community Design chapter."

Modify Policy R-6D to read: Residential Design Standards currently exist. This policy is unnecessary and should be deleted.

The City of Alhambra needs to include enforcement language of these standards in its draft General Plan either through penalties or fines for non-compliance and include the training of code enforcement personnel to recognize inappropriate residential modifications.

Replace Policy R-6D with: Fund and conduct a citywide survey to identify all historically, architecturally and culturally significant residential and commercial structures.

Current Policy R-6E states: "Enforce applicable historic preservation laws to preserve state or federally designated historic resources and other resources (e.g. archaeological and paleontological) eligible for such designation."

Modify Policy R-6E to read: No modification necessary. This policy is acceptable.

Current Policy R-6F states: "Investigate the possible establishment of a local regulatory framework for the designation and protection of significant historic and cultural resources."

Modify Policy R-6F to read: Develop and implement a comprehensive historic preservation program, including but not limited to: (1) adoption of a historic preservation ordinance, (2) establishment of a local landmark designation program, (3) creation of a historic resources commission, and (4) establishment of a local Mills Act program for owners of historically significant homes and commercial structures.

Add Policy R-6G to read: Apply for official certification under the State Certified Local Government (CLG) Program.
5. Mistakes, Omissions, Discrepancies in Alhambra's draft General Plan, draft EIR and Implementation Actions for the General Plan

The following is a listing of mistakes, omissions, and discrepancies identified by APG in the draft General Plan, draft EIR and Implementation Actions for the General Plan:

A. Draft General Plan, Cultural Resources Section, Page 75: The paragraph at the bottom of the page states,

"Alhambra recognizes the need to maintain an attractive and aesthetically pleasing environment that considers historic context. In 2009, the City adopted the Single Family Residential Design Guidelines for R-1 (Single Family Residential) zoned neighborhoods, which consider the historic context of Alhambra's neighborhoods by providing guidance for renovation and development appropriate for Alhambra's eight predominant architectural styles. The City's zoning code also serves to preserve the character and integrity of existing neighborhoods."

This is inaccurate. The City's current zoning code does not preserve the character and integrity of existing neighborhoods because the City of Alhambra currently has no legal authority to protect and/or preserve historically, culturally or architecturally significant structures. The current Single Family Residential Design Guidelines for R-1 (Single Family Residential) only provide suggestions and rely on voluntary adherence to these guidelines for the renovation and construction of new residences. There is nothing in the City of Alhambra's municipal code regulating the designation and protection of existing historical, architectural and cultural resources.

B. Draft General Plan, Cultural Resources Section, Page 77: Under Cultural Resources, the paragraph reads, "Alhambra recognizes that the identification and preservation of the community's cultural resources are important to improve the quality of the built environment and encourage appreciation of the City's history and culture." APG agrees with this statement and believes that creating Goal R-6 and Policies R-6A through R-6F should concretely reflect this statement; however, there is a discrepancy between the statement that "Alhambra recognizes that the identification and preservation of the community's cultural resources are important..." and the policies, which are weak and noncommital. Please explain why Goal R-6 does not include concrete policies that would reflect the statement on page 77.

C. Draft General Plan, Cultural Resources Section, Page 77: The photograph on the bottom of the page is of a house located in the city of South Pasadena at 2032 Pine Street. A photograph of a Craftsman-style historic residence in Alhambra needs to replace it.

D. Draft General Plan, Cultural Resources Section, Page 80: The photograph on the top of the page is (again) of a house located in the city of South Pasadena at 3027 Fletcher Street. This photograph needs to be replaced with a photograph of a Craftsman-style historic residence in Alhambra.
E. Draft Environmental Impact Analysis, Page 85, Section 4.3.1.b: This section states, "A number of previous cultural resources investigations have been completed in Alhambra, including a citywide historic resource survey in the 1980s." This is incorrect. A citywide inventory of historic resources has never been conducted in the city of Alhambra. This statement needs to be corrected. As stated earlier, only two neighborhoods in Alhambra were surveyed in the 1984-85 partial survey.

F. The draft General Plan and the draft EIR both refer to the existence of the 2009 Single Family Residential Design Guidelines; however, Policy R-6D in the draft General Plan states the need to "develop and implement design standards that maintain the character of established residential neighborhoods..." This discrepancy needs to be rectified. Policy R-6D needs to be deleted and replaced with a policy that commits the City of Alhambra to conduct a citywide survey of its historical, architectural and cultural resources.

These mistakes, omissions and discrepancies must be revised or corrected before Alhambra’s final General Plan and EIR are presented to the City Council for approval.

6. Questions created by Alhambra’s draft General Plan, draft EIR and Implementation Actions for the General Plan

A. This draft General Plan does not include the mandated Housing Element and that could have significant consequences to the development of a historic preservation program. Why isn’t the required Housing Element included?

B. Why doesn’t the draft General Plan include a dedicated preservation element as was suggested by the Alhambra Preservation Group and numerous residents who were present at the community input meetings?

C. If 52% of surveyed Alhambrans stated that the preservation of historic structures should be prioritized and this was a common theme throughout every General Plan community meeting conducted by the City of Alhambra and its consultants, why doesn’t the City of Alhambra include policies and goals that would unequivocally commit Alhambra to adopt a historic preservation ordinance?

D. Implementation Action R4 on page 94 of the draft EIR recommends the creation of a Cultural Resources Commission and a design review process administered by said Cultural Resources Commission; however, the creation of a Cultural Resources Commission is deleted from the Implementation Actions for the General Plan document. Why was this deleted?

E. The EIR identifies five implementation actions in the draft EIR – Implementation Action R4 – R8. However, two of these goals, Implementation Action R5, which calls for cultural resources survey of Alhambra’s neighborhoods and the incorporation of findings into the City’s cultural resources inventory, and Implementation Action R8, which states that Alhambra should consider application for official certification under the State Certified Local Government (CLG) Program, are deleted in the City’s Implementation Actions for the General Plan. Why were they deleted?
F. Alhambrians deserve to first understand what resources are within our city before developing a program to protect those resources. Why is there no policy in the Resources section of the draft General Plan that directly addresses the need for a citywide survey of Alhambra’s historical, architectural and cultural resources?

Alhambra’s draft General Plan is deeply flawed. It does not reflect the voices of Alhambrians demanding a comprehensive historic preservation program. Nor does it reflect the promises made by city leaders to community members regarding stronger historic preservation measures and policies to protect Alhambra’s historic resources.

In providing these comments, it is APG’s goal to provide direction and recommendations for concrete policies and goals to guide Alhambra unequivocally towards developing and implementing a comprehensive historic preservation program. We welcome and are open to the opportunity to meet with city leaders to realize that goal.

We thank you for the opportunity to respond to the draft Alhambra General Plan, draft EIR and Implementation Actions for the General Plan. We look forward to receiving written responses and answers to the submitted comments and questions so that we may communicate that to our membership.

If you should have any questions or need additional information, we may be reached at info@alhambrapreservation.org.

Sincerely,

Board of Directors
Alhambra Preservation Group

[Signatures]

cc: State of California, Office of Historic Preservation
Los Angeles Conservancy
U.S. National Park Service, National Register of Historic Places

October 3, 2018
Appendix A

The 1994-95 Alhambra Historic and Cultural Resources Survey concludes with a listing of buildings and neighborhoods identified for further surveys, which included:

**Public Buildings**
Post Office at 10 West Bay State
Engine Company #4 at 2505 Norwood
Ramona Substation at 7th Street and Helman Avenue

**Community Design Features**
Reservoir at the Pyrenees Castle
Water Tower
Streetlights on Valley Blvd. and Commonwealth

**Educational Buildings**
Mark Keppel High School, 501 East Helman
Marguerita School, 1603 South Marguerita
Emery Park School, 2821 West Commonwealth
Ramona School, 509 West Norwood

**Religious Buildings**
Latter Day Saints, 1212 South 8th Street
Bethany, 21 North Olive
Grace Lutheran, 433 North Atlantic
Baptist, 101 South Atlantic
Methodist (former), Acacia and Marengo
Saints Simon and Jude (Episcopal Home), 1428 South Marengo
Christian Science, 200 West Commonwealth
St. Thomas More, 2510 South Fremont
All Souls, 1712 West Main Street
Alhambra Community, Commonwealth and 2nd

**Institutional Buildings**
Sale of the Square, 113 South Main Street
Sigma Nu, 2611 Ramona
American Legion, 24 North Stoneman

**Commercial Buildings**
Alhambra United Church, 503 East Main Street
200 West Main Street
1-11 South 2nd Street

**Industrial Buildings**
Turner and Stevens, 555 East Main Street
Ocean Sea Food Restaurant, 25 West Valley Blvd.

C.F. Braun Co., 1000 South Fremont
Southern California Edison, 501 South Marengo
Bungalow Courts/Courtyard Housing/Apartments
1500 Fremont
2548-54 San Clemente
Hellman Avenue, between La Paloma and Meridian
1515 Sierra Vista
410 South 4th
South 8th Street and Washington
105 South Olive
111 South Olive
127 South Olive
204 South Olive
234 South Marguerita
Palm Villa Court, 110-120 North Marengo
Bushnell Court, 36 North Bushnell Avenue
315 Chapel
Polynesian Apartments, 109 South Almansor
Polynesian Apartments, 805 South Chapel

Residential
Two-story, turn of the century home, 1501 South Campbell
Two-story, American Foursquare, 1510 South Campbell
One-story Queen Anne Victorian, 816 South Edith
One-story Craftsman, 18 East Eighth
One-story, Turn-of-the-Century, Craftsman, 2300 El Paseo
Streamline Moderne (1937), Linda Vista and 2nd Street
Victorian Cottage, 24-24 ½ Olive
Tudor, 3008 Pyrenees Drive
1 ½-story, turn of the century, 2114 San Clemente
1 ½-story, turn of the century, 2118 San Clemente
Two-story Queen Anne (behind Art Deco commercial), 243 West Valley
Two-story Queen Anne, 2003 West Valley

Potential Survey Areas
Atlantic, eastern city limits, northern city limits, Commonwealth
Koida residence (Spanish), 414 East Alhambra Road
Donahue residence, 418 North Almansor
Olson residence, 423 North Almansor
J. Stuart residence, 500 North Almansor
North Almansor, 247 North Almansor, 300 North Almansor
One-story Queen Anne, 219 North Chapel
Two-story Prairie, 226 Commonwealth
Two-story Classical Revival, 31 North Granada
Two-story Craftsman, 101 North Granada
Two-story Georgian Revival, 300 North Granada
Two-story Tudor, 1909 North Granada
Two-story Tudor, 1909 North Granada
One-story Spanish, 314 West Grand Avenue
1 ½-story Spanish, 10 Helsteed Circle
226 North Hidalgo
Clay residence, 717 North Hidalgo
Craftsman grouping, 25 North Hidalgo
Craftsman grouping, 31-33 North Hidalgo
Craftsman grouping, 164 North Hidalgo
Craftsman grouping, 108 North Hidalgo
Gooswin residence, 108 North Hidalgo
Craftsman grouping, 111 North Hidalgo
Craftsman grouping, 117 North Hidalgo
Craftsman grouping, 132 North Hidalgo

Tanner residence, 620 Lincarosa Park
Two-story Craftsman, 25 North Hidalgo
Two-story Craftsman, 31-33 North Hidalgo
Two-story Craftsman, 108 North Hidalgo
Two-story Craftsman, 111 North Hidalgo
Two-story Craftsman, 117 North Hidalgo
Two-story Craftsman, 132 North Hidalgo

Two-story Monterey, 1117 North Story Place

Two-story Colonial Revival, 415 North Vega Street
Two-story Art Deco commercial, 10 South 1st Street

1 ½ story Craftsman, Sweet residence, 119 North 5th Street
Clapp residence, 301 South 5th Street
2-story farmhouse, 212 South 6th Street
1-story Craftsman, 326 South 6th Street
8.12 Letter 12

COMMENTER: Joyce Amaro, President, Alhambra Preservation Group

DATE: October 3, 2018

Response 12.1
The commenter describes the Alhambra Preservation Group (APG) and its mission. No response is warranted.

Response 12.2
The commenter is pleased that historic, architectural, and cultural resources are being discussed, but suggests that the draft General Plan goals and policies do not provide actionable direction for the preservation of such resources.

This general concern is noted. Specific concerns are addressed in responses 12.3 through 12.21.

Response 12.3
The commenter states disappointment with what she describes as “tepid” goals and policies in the draft General Plan, believes that the draft General Plan and Draft EIR are invalid due to errors, omissions, and inconsistencies, and suggests that implementation actions mentioned in the Draft EIR should be included in the General Plan.

The opinions regarding the draft General Plan and Draft EIR are noted. City staff have attempted to address local concerns regarding cultural resources while balancing such concerns against other community goals. Again, specific concerns are addressed in responses 12.4 through 12.21. With respect to implementation actions mentioned in the Draft EIR that are not in the draft General Plan, this was an error. Certain actions mentioned in the Draft EIR Cultural Resources section reflect an earlier version of the draft General Plan rather than the version that was made available for public review in August 2018. Internal discussions between the preparation of the Draft EIR and the final draft of the General Plan resulted in changes to policy and implementation action language that the EIR preparers failed to reflect in the Draft EIR. These items have been corrected in the Final EIR and to reflect additional language changes made in response to suggestions included in the commenter’s letter.

Response 12.4
The commenter notes that other nearby cities have entire elements or chapters dedicated to cultural resources and suggests that draft General Plan goals and policies need to be strengthened. The commenter also notes that subsequent comments focus on six key areas.

This opinion and the six key areas of discussion are noted. Again, specific suggestions are addressed in subsequent responses. It is acknowledged that the general plans of several neighboring cities have entire chapters/elements regarding cultural resources.

Response 12.5
The commenter provides an overview of APG’s role in the development of the draft General Plan, notes that many residents have expressed support for preserving historic areas, and suggests that
actions mentioned in the Draft EIR (e.g., historic resources survey, Cultural Resources Commission, and application for designation as a Certified Local Government) should be included in the General Plan.

APG’s role in the development of the draft General Plan and the fact that many residents are concerned about historic resource preservation are noted. As noted above, City staff have attempted to address such concerns. As noted in Response 12.3, the Draft EIR erroneously cites outdated draft language from an earlier version of the draft General Plan. However, it should be noted that General Plan Implementation Action R4 directs the City to investigate the adoption of a preservation ordinance. Although the language requiring a survey and Cultural Resources Commission was not ultimately included in the draft General Plan in order to provide more flexibility for decision makers in terms of how to structure a preservation ordinance, such an ordinance would typically include these items or similar.

The specific support for items R4-R8 listed in the Draft EIR is noted. These items include:

**Implementation Action R4**
Investigate adoption of a preservation ordinance that creates a Cultural Resources Commission and a design review process administered by the Cultural Resources Commission that uses the Secretary of the Interior's Standards for the Treatment of Historic Properties and other adopted design guidelines as the basis for the protection of buildings, structures, and archaeological sites that are more than 50 years old and have demonstrated cultural, historical, and/or architectural significance. The ordinance shall also establish a cultural resources inventory that catalogs all properties in the City, existing designations, and eligible resources.

**Implementation Action R5**
Conduct cultural resources surveys of the City's neighborhoods. As part of this effort, prepare and adopt a historic context statement that identifies significant themes and associated property types, and include registration requirements for eligible resources. Surveys will be completed by persons meeting the Secretary of the Interior's Professional Qualification Standards and using the adopted historic context statement. Surveyors should consult with the Alhambra Preservation Group and Alhambra Historical Museum to identify potentially significant properties. Findings from surveys and other cultural resources studies conducted in the City will be incorporated into the City's cultural resources inventory.

**Implementation Action R6**
Investigate the potential for incentive programs (such as Mills Act program) for the preservation of identified historic properties.

**Implementation Action R7**
Seek private and public foundation grants following the guidance of the Office of Historic Preservation's Incentives for Historic Preservation. Grants would assist in funding historic preservation activities in the City, such as cultural resources surveys and the rehabilitation of City-owned historic properties.

**Implementation Action R8**
Consider application for official certification under the State Certified Local Government (CLG) Program. The CLG program allows qualified local governments to have more direct participation in the federal and statewide historic preservation programs. CLGs are eligible for special
matching grants for projects that further local historic preservation objectives.

City decision makers may elect to include these in the final list of General Plan implementation actions. Inclusion of these items would provide more specificity and certainty with respect to the City’s intent to preserve historic resources and would not alter the conclusions of the Draft EIR.

Response 12.6

The commenter states that a citywide historic resources survey has never been conducted, indicates that the statement suggesting that such a study was conducted invalidates the Draft EIR historic resources analysis, indicates that a moratorium on razing of buildings is needed, states that Alhambra’s residential design standards are voluntary, and opines that a citywide survey must be included in the General Plan.

As discussed on the commenter acknowledges and the Draft EIR states, a historic resources survey was conducted in 1984-85. As the commenter notes, this survey focused on two key City neighborhoods. In order to clarify this point, the first sentence in subsection b on page 88 of the Draft EIR is revised to read as follows:

A number of previous cultural resources investigations have been completed in Alhambra, including a citywide historic resources survey of pre-World War II buildings in two city neighborhoods conducted in the 1980s.

This clarification has no bearing on the validity of the Draft EIR’s analysis of historic resource impacts.

The opinion regarding the moratorium for the razing of buildings is noted, but is not relevant to the draft General Plan. The draft General Plan, even in its current state, strengthens historic resource protection relative to the current General Plan. In addition, the City will continue the current practice of addressing and, as necessary, mitigate historic resource impacts on a case-by-case basis until the General Plan and any historic resource protection ordinance is adopted.

As discussed on page 95 of the Draft EIR, the City’s Residential Design Standards in Chapter 23.44.040 of the Alhambra Municipal Code, state that a property in an area “designated as having historic and cultural significance in the Historic and Cultural Resources Survey shall be designed and constructed to reflect the neighborhood theme (through the use of horizontal wood shiplap siding or wood shake, mission tile or concrete tile roof materials).” The term “shall” indicates that these standards are mandatory, not voluntary.

The opinion regarding the need for an inventory is noted. Please see Response 12.6. City decision makers may elect to include such a requirement in the final list of General Plan implementation actions.

Response 12.7

The commenter suggests that the past failure to adopt a historic preservation ordinance has resulted in the loss of some resources (providing a list of such resources) and suggesting that failing to adopt an ordinance now may result in future additional losses, again providing descriptions of some resources that could potentially be altered. The commenter again reiterates the need for a citywide survey and preservation ordinance.
The concern about the past loss of resources is noted, but is not relevant to the current draft General Plan or the Draft EIR. The Resources chapter of the draft General Plan includes Goal R-6 and related policies aimed at the preservation of cultural resources. As discussed in previous responses, implementation actions have been identified to implement this goal and related policies. These would improve cultural resource protection in the City and reduce programmatic cultural impacts under CEQA to a less than significant level. Nevertheless, it is true that individual developments in the City could potentially adversely affect local historic resources. Such impacts would need to be addressed as part of a project-level CEQA review. As noted above, it is agreed that the implementation actions recommended by the commenter would further strengthen cultural resource protection in the City. City decision makers will need to decide whether or not these stronger provisions should be included.

Response 12.8

The commenter recommends several changes to the language of draft General Plan policies.

The suggested addition to Policy R-6A will be made in the final General Plan. Although staff does not agree that Policy R-6D should be deleted, it will be modified as follows:

*Policy R-6D Update as appropriate and continue to implement design standards that maintain the character of established residential neighborhoods, as discussed in the Land Use and Community Design chapter.*

City staff does not recommend the suggested changes to policies R-6B or R-6F or the addition of R-6G. Staff believe that the recommended change to R-6B inappropriately suggests that the City will form neighborhood associations. With respect to R-6F, staff believes that the current language lays out the intent of the policy while giving decision makers flexibility in how that intent is achieved. Staff believe that R-6G is unnecessary.

City staff will, however, share the commenter’s recommendations with decision makers, who will make a final decision regarding their inclusion in the General Plan.

Response 12.9

The commenter states an opinion that a passage in the draft General Plan is inaccurate.

Staff disagree with this opinion. The statement in question does not state that the City has adopted a specific historic preservation ordinance, but merely describes mechanisms currently in place that contribute to such preservation. Staff believe that the statement is accurate. This does not, however, mean that the City cannot do more to protect historic resources if it chooses to do so.

Response 12.10

The commenter suggests that goals and policies related to cultural resource preservation are inconsistent with the statement regarding the importance of such resources.

This opinion is noted. Staff believe that the policies as proposed (and revised per the commenter’s suggestions) are consistent with the statement in question. As noted in previous responses, inclusion of even stronger policies and actions would achieve cultural resource preservation to an even greater degree. City decision makers will make a final determination regarding whether to include the policies and implementation actions recommended by the commenter.
Response 12.11
The commenter suggests replacing a photo of a house at 2032 Pine Street with a Craftsman-style house in Alhambra.
This photograph will be replaced in the final General Plan.

Response 12.12
The commenter suggests replacing a photo of a house at 3027 Fletcher Street with a Craftsman-style house in Alhambra.
This photograph will be replaced in the final General Plan.

Response 12.13
The commenter reiterates a concern about a statement regarding a historic resources inventory.
Please see Response 12.6.

Response 12.14
The commenter again suggests that Policy R-6D needs to be replaced. With a policy committing to a cultural resource survey.
Please see Response 12.8.

Response 12.15
The commenter asks why the Housing Element is not included in the draft General Plan.
The current Housing Element is valid through 2021 so does not need to be updated at this time. Although not included in the current update, the current Housing Element will remain part of the General Plan.

Response 12.16
The commenter asks why a dedicated preservation element has not been included.
Staff does not believe that a separate preservation element is necessary to achieve City goals related to historic resource preservation so did not include such an element in the scope of work for the General Plan update. Goal R-6 and related policies in the Resources chapter of the draft General Plan are aimed at preserving the City’s historic resources.

Response 12.17
The commenter again asks why the draft General Plan does not include more definitive policies for historic resource preservation.
This question is addressed in previous responses. Please see responses 12.3, 12.5, and 12.6.

Response 12.18
The commenter again notes that an implementation action mentioned in the Draft EIR is not included in the implementation actions for the draft General Plan.
As discussed in Response 12.5, the implementation action in question was erroneously included in the Draft EIR.

Response 12.19
The commenter again asks about implementation actions mentioned in the Draft EIR that are not included in the draft General Plan implementation actions.
Please see responses 12.5 and 12.18.

Response 12.20
The commenter again asks why there is no policy requiring a citywide cultural resource survey.
Please see Response 12.5. Again, although current policies do not specify a citywide inventory, such an inventory would typically be part of the ordinance discussed in Implementation Action R4.

Response 12.21
The commenter states an opinion that the draft General Plan is “deeply flawed” and suggests that it does not reflect promises made by City leaders.
This opinion is noted. The draft General Plan considers public comments received during the public involvement process and attempts to balance the sometimes competing interests of various community members.
Dear Sirs/Mmes,

Since the last opportunity for written public input in June of 2017, little, if any, inputs from myself and others I have spoken to have been seriously considered. This was further evidenced by the way in which the last city-sponsored public input meeting on September 11, 2018 was handled. Once again, the meeting was poorly facilitated.

Past efforts by the city to engage with residents has been quick to focus on specific concerns without broader engagement to facilitate policy-level discussions. The result has been a draft General Plan that dangles appealing carrots without the underlying commitment and cohesion necessary to bring them to fruition. Talk of pathways over active railroad tracks to solve park space shortages, the ridesharing economy as a solution for traffic congestion, and motherhood statements on the need for a healthy environment and neighborhood character range from ignorance to appeasement to, arguably, subterfuge. Without a feasible plan, it's a fantasy that detracts from honest conversations about the sustainable outlook for the city.

Furthermore, the document fails to adequately address key concerns within each of its elements. Glaring omissions regarding the Environmental, Housing, Transportation/Circulation, Land Use elements, for example, are astonishing. Even with regard to Economic Development, clearly a focus of this document, it falls miserably with regard to the effects on household economic development.

But the most disappointing aspect of the city’s process in developing these documents has been its lack of honesty with the public that goes beyond the disregard of public input. Instead of treating the public as true stakeholders in the city’s future, the city obfuscates any discussion of fiscal matters from public view. For the past two years of General Plan development, with all the money spent on the consulting firm and city resources, and more importantly the time and effort of the public, it is an abomination that the city wasted the opportunity to be honest with the public on the trade-offs regarding revenues with respect to costs. Instead, the draft General Plan springs upon us items that do not originate from public input (as confessed by the facilitator during last month’s public input meeting) in an effort to generate sales tax revenues without balanced discussion on their costs to people’s lives.
This invokes a serious lack of trust with the community. And it is not unwarranted, especially when the city allows those who profit from associated transactions to have access far beyond what most residents are allowed. For example, the attached emails between a Mr. Mark Paulson (a real estate broker and developer’s consultant for projects that include those detailed in the emails) and city staff show him choreographing city/developer presentations to the public, ghost writing a letter on behalf of the mayor that is addressed to a developer for which Mr. Paulson consults, and making disparaging references to public engagement. As such, the draft General Plan is viewed as a hunting license for those interests that profit from what it allows. Note that I would like the attached emails to be part of the record for my input.

Both the city and its consultant must take responsibility for this. Do you really want to be associated with such a general plan? One that, as a policy statement, allows for Grade F traffic at major intersections? One that ignores the problem of our time, affordable housing, by waving away the need to address it just because you can delay and dilute the discussion despite the fact that you’ve delayed the General Plan update beyond the cycle of the Housing Element? All of the above renders the EIR invalid, as there is there is a fair argument that the General Plan in its current form will have significant impacts that are not avoided altogether or adequately mitigated to a level of insignificance on the subject of traffic, environmental degradation, air quality, fair housing, and land use compatibility.

Sincerely,

Eric Sunada
Resident of Alhambra
The commenter states various concerns about the General Plan process and the draft General Plan, suggesting a lack of honesty and stating concerns about traffic levels and the fact that the draft General Plan does not address affordable housing. The commenter goes on to suggest that his concerns render the EIR invalid because the General Plan would have significant impacts that are avoided or not mitigated.

The concerns about the General Plan and process are noted. These issues do not pertain directly to the EIR, but it should be noted that the City staff and consultants have attempted to be responsive to the range of concerns and issues raised by the community during the preparation of the draft General Plan while balancing sometimes competing interests.

The grade F traffic levels referenced by the commenter are actually part of the baseline condition experienced in Alhambra. As noted in the Draft EIR, growth forecast under the General Plan would further exacerbate this condition, but traffic congestion in Alhambra is more a function of regional traffic and growth than growth in Alhambra itself.

With respect to affordable housing, the City’s Housing Element remains valid through 2021 so is not part of the current update. However, the preparer of the Housing Element is a member of the current General Plan team and has confirmed that no provision of the current General Plan update would conflict with the Housing Element. Moreover, various other goals and policies contained in the draft General Plan are specifically aimed at improving the quality of life for Alhambra residents through, among other things, developing housing that is affordable to a range of income levels, providing high wage jobs, and minimizing residents’ exposure to environmental hazards.

The opinion regarding the validity of the EIR is noted. However, absent more specificity regarding what the commenter believes is invalid, a meaningful response to this general comment is not possible.
Letter 14

From: Bernice Ortega <goshnana@yahoo.com>
Sent: Tuesday, October 2, 2018 1:41 PM
To: Melissa
Cc: Alhambra General Plan
Subject: Re: public comment about D-EIR General Plan

Melissa

Melissa good job and you mention about that park being on mission street isn't mission st. in san Gabriel? And I think there going through it they are survey (Edison Co) are going yard to yard accessing the lines and put and the city boundaries are changing. I think the city should be included all residents and general plan should hold off till after the election my take. Is that they want to push it through before a new council comes in, nothing this city does is what the residents and need I have no trust in this city anymore they will sell us out to the highest bidder in my opinion.

Bernice
Excuse my punation

Bernice sent this from her
iPhone

On Oct 1, 2018, at 11:42 PM, Melissa <melmiamichele@email.com> wrote:

Oct. 1, 2018

Dear City of Alhambra

Re: Draft EIR General Plan Vision 2040

I begin my comments and questions with general topics, but the 2nd half of this email focuses on the hotel.

- In all the community meetings, including the one from Sep. 11, residents were vehemently opposed to building a "linear park" on top of the Mission street train tracks. Residents as cited in the telephone survey results as well as at those meetings, want REAL parks with large shady trees, picnic tables, a skateboard park, tranquil spots to do Tai Chi – not a rumbly smoggy overpass to the existing train.

- A ‘tree master plan’ is referred to various places, -like Policy LU-8A - what is that? Where can we read that plan? Please update the GP draft to include the new tree ordinance passed by the City Council in 2018.

- If the city wants to satisfy (Goal QL-3) “improve the City’s position as a destination for entertainment and overnight visits” why not transform the Victorian structure from at least 1888 at 403 S. Garfield into a Bed and Breakfast? It is within walking distance of downtown Alhambra Main/Garfield.
8.14 Letter 14

COMMENTER: Bernice Ortega

DATE: October 2, 2018

The commenter states agreement with comments from Melissa Michelson, makes comments about a park on Mission Street and an Edison survey, and suggests that the General Plan should not move forward until after the election.

Ms. Michelson’s comments are addressed in the responses to Letter 11. It is not clear what park and survey the commenter is referring to, but the linear park idea included in the draft General Plan is being removed from consideration. The Planning Commission and City Council will not consider the General Plan until after the November 2018 election.
October 3, 2018

Community Development Department
Attn: Vanessa Reynoso, Deputy Director of Community Development
City of Alhambra
111 South First Street
Alhambra, CA 91801

Dear Ms. Reynoso:

Thank you for the opportunity to submit my comments to the documentary record associated with Alhambra’s Draft General Plan (7/31/18), Draft Implementations Actions Document (7/03/18), Draft Environmental Impact Report (August 2018), and Draft EIR Appendices (7/30/18).

I have been a resident of Alhambra for the past 30 years. For nearly half that time, I have been actively involved as an educator and advocate for the preservation of Alhambra’s historic architectural and cultural resources. I am honored to have been among the founding board members of Alhambra Preservation Group, and to have served as that organization’s President. In that capacity, I have participated in most of the activities related to the update of Alhambra’s General Plan since the project commenced in Spring, 2015. On May 5, 2015 I met with consultants hired by the City, in what was described as an interview with community stakeholders for a review of the General Plan update process and identification of important issues to be addressed. I attended three of the community meetings hosted by the City and conducted by project consultants at the Alhambra Public Library (May 20, 2015; January 13, 2016; and June 14, 2017). I helped to facilitate three additional, well-attended community meetings on the subject of the General Plan update during the Summer of 2015, hosted by Alhambra Preservation Group and located in diverse neighborhoods throughout the city. I encouraged my fellow APG members, friends and neighbors to complete and submit the half-sheet General Plan Comment Cards and nine-page General Plan Surveys (prepared by True North Research). I collected and submitted scores of these documents to the Development Services Department at City Hall, completed by residents who earnestly believed their input would be incorporated into the General Plan that would guide Alhambra’s policy development over the next two decades. The Draft documents now under review suggest that this was not the case.

Throughout this three-year process, my colleagues in Alhambra Preservation Group and I have been clear in articulating one key goal at every opportunity that was provided for feedback, and at every planning meeting: the establishment of Historic Preservation as a separate element in Alhambra’s General Plan. The inclusion of this optional element, in addition to those that are required under California law, would provide equal status for this
important land use and public policy concern, as well as internal consistency within the
General Plan document itself. It also would offer a clear pathway to the achievement of other
important goals frequently discussed during public meetings throughout the General Plan
update process: the completion of a comprehensive Historic Resources Inventory/Survey for
the identification of significant local buildings and sites; the adoption of an Alhambra Historic
Preservation Ordinance, including the establishment of an Historic Preservation Commission;
and application for Certified Local Government (CLG) designation, enabling Alhambra to
compete for federal and state funds for preservation efforts.

Rather than incorporate this valuable community input into the Draft General Plan, the
documents now under review contain material errors and misstatements of fact, nebulous
language, as well as inconsistent and contradictory policies. There are frequent references
to the important of "neighborhood preservation" (a concept that is never clearly defined
here), and comparatively few references to the issue of historic preservation. At every public
meeting that I attended, historic preservation was addressed by a clear and vocal majority of
participants, as well as in every small discussion group facilitated by a Rincon consultant
taking notes on wall-mounted posters. Curiously, page 9 of the Draft General Plan omits
historic preservation as one of the key community desires identified in the outreach effort.
Photos on pages 77 and 80 of the Draft General Plan identify "historic Alhambra residences" that are, in fact, located within the City of South Pasadena. Policy R6-A addresses a
commitment to the promotion and encouragement of historic preservation. The City may
"promote and encourage" historic preservation, as well as the formation of neighborhood
associations to foster "neighborhood preservation" (Policy R6-B) for the next twenty years or
more, but absent the adoption of a local regulatory framework for the preservation of
historic architectural resources, Alhambra will lose many hundreds of significant
historic buildings over that term. In fact, Policy R6-F refers to the investigation of the
possible establishment of a regulatory framework; if this is intended as a statement that
guides future decision-making and specifies the intended level of commitment on the subject
of historic preservation, Alhambrans should expect at least another 20 years of deliberation
and discussion, without resolution.

It is my assertion that the Draft General Plan is fatally flawed, in that it either ignores or
willfully misinterprets significant public input. To correct the deficiencies that I and other
community members have identified will require a substantial amount of revision and
rewriting, as well as additional public meetings, before this can truly be said to be a citizen-
based statement of Alhambrans' long-term vision for community values and concerns. I urge
the City and its leaders to invest the time and resources to get it right.

Sincerely,

Christine Olson
8.15  Letter 15

COMMENTER:  Christine Olson

DATE:  October 3, 2018

The commenter notes that Alhambra Preservation Group has been involved throughout the General Plan process, states disappointment with the proposed goal and policies related to historic preservation, suggests that many historic properties will be lost without a local regulatory framework, and states an opinion that the draft General Plan is fatally flawed.

These comments do not pertain directly to the Draft EIR, but will be considered by City decision makers as they review the draft General Plan. City staff has attempted to incorporate the input and concerns of the Alhambra Preservation Group, while balancing their concerns against other community objectives. Staff believes that the proposed historic preservation goal and policies, along with other goals such as those related to maintaining stable residential neighborhoods, will generally achieve the Alhambra Preservation Group’s goals related to historic resource preservation while providing City decision makers flexibility with respect to future land use decisions. Nevertheless, City decision makers may elect to include stronger policy language, as suggested in Letter 12 herein, in the final General Plan.

With respect to identifying historic preservation as a key desire of the community, staff believe that the reference to “stable residential neighborhoods” on page 2 of the draft General Plan encompasses this notion generally given that the majority of the community’s potential historic resources are in residential neighborhoods.
To
Community Development Department
Attention: Vanessa Reynoso, Deputy Director of Community Development
City of Alhambra
111 South First Street
Alhambra, CA 91801

October 3, 2018

Dear Ms. Reynoso

Grassroots Alhambra (GRA) hereby timely submits comments on the three related documents pertaining to the General Plan Update.1 These are the Draft General Plan (July 2018) (hereafter “DGP”); the Draft Environmental Impact Report (August 2018) (hereafter “DEIR”); and Draft Implementation Actions (no date) (hereafter “DIA”).

Grassroots Alhambra is a community-based nonprofit organization, whose mission is: To make Alhambra a better place to live, work and grow; to foster local government transparency/accountability and positive change through education and community participation.2

We note at the start that the DGP is less of a Plan than simply a set of concepts.

Setting aside for a moment that even at a conceptual level, many of the key ideas in the DGP are unworkable, we had a reasonable expectation that after more than three years of work, and the expenditure of considerable sums of scarce resources,3 the City and its many consultants would have produced a far better product – an

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1 All of the documents for which comments are being submitted were obtained from the City of Alhambra’s website located at http://www.cityofalhambra.org/page/544/general_plan_update.

2 For more information, please visit the GRA website at https://www.grassrootsalhambra.org/.

3 Data gathered from the City indicates that expenditures have exceeded $700,000 without accounting for all of the consultants or staff time.

Grassroots Community Group of Alhambra
10 West Temple Street, #133
Alhambra, CA 91802
actual Plan, with timelines to achieve actual outcomes and resources identified to do so. Clearly, the DGP fails in that regard.

To the extent that the DIA, as named, is the implementation of at least some of the ideas in the DGP, it too fails. After carefully noting that the DIA is not part of the DGP, and therefore escaping any binding implementation of any of its "actions," it is manifestly thin. For example, in its six substantive pages (the ones with the tables containing the numbered strategy items), it identifies 41 strategies (including duplicates, such as R1 and S13) and assigns priority levels and timeframes to each. The DIA does not discuss how the priority levels or timeframes were arrived at, or how community input, if any, was part of arriving at the stated priority levels and timeframes. In any case, the qualitative timeframes, with no resource discussions, make actual realizations of these "strategies" meaningless. We note that of the 41 strategies, there were 10 identified as "High Priority." Of these, 7 are ongoing items.

Finally, as to the DEIR, given that the purpose of the EIR is to provide an analysis of the impacts of the GP (in effect, the GP is the "Project" whose impacts are analyzed in the EIR), without a better definition of the "Project/DP," the EIR's analysis cannot even begin. One cannot analyze a concept or set of concepts; and, in trying to do so, the DEIR simply makes assumption after assumption, most without support or factual basis. While the baseline discussions in the DEIR are useful, they too suffer from inconsistencies and contradictions.

For the reasons stated above and our comments stated later, GRA's comments do not address each and every deficiency or ask for clarifications for each and every issue in the DGP, DEIR, or DIA. As such, these comments only address the major structural flaws in these three documents. It is GRA's opinion, based on our collective review of these documents, that until the major flaws in these documents

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4 DIA, page 1. "This stand-alone document was developed concurrently with the 2018 General Plan but is not part of the General Plan."
are addressed, the documents themselves are currently un-approvers under any reasonable standard, including applicable legal standards. Further, it is our opinion that when such structural flaws are addressed, all three documents are likely to be substantially different, making detailed comments at this stage inefficient and moot.

In simple terms, all three of these documents require substantial revisions. Merely cosmetic changes cannot overcome the many fatal flaws, some of which we have identified in our comments attached.

Lastly, a comment about process: While we appreciate the few meetings and hearings that the City and its consultants have held over the last 3 years leading up to the Draft documents at issue, we believe that the level of community engagement has not been adequate. General Plan updates (and there are many examples, including in surrounding cities) typically involve many more meetings – both focused and general – with all stakeholders in the City. In fact, as an example, we point to the City of Calabasas, where Rincon, the same consultant used by Alhambra, assisted that City in its GP update in 2008. We counted 17 meetings and 3 workshops in over a 18-month period. (This is but one example, cited only because the same consultant was involved. Frankly, it confirms that the problem is less the consultant and more the direction given to the consultant by the City.)

We look forward to working with the City, other stakeholders, and all of Alhambra’s residents in making sure that the final result of this General Plan Update process, which began in 2015, results in a meaningful and practical, updated General Plan which addresses the actual challenges faced by the City and helps improve the quality of life for all Alhambra’s citizens.

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3 http://www.cityofalhambra.com/general-plan.html

Grassroots Community Group of Alhambra
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We specifically ask that the City address each and every one of our comments.

If you have any questions, please contact me.

Sincerely,

Jose Aguayo, President

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#1235
Alhambra, CA 91802
GRA Comments on the Draft General Plan (DGP), Draft Environmental Impact Report (DEIR), and Draft Implementation Actions (DIA)

GRA’s comments below address only the major issues we have identified in these three documents. It is our opinion that, when addressed, these documents will likely undergo material changes – thus making comprehensive comments, at this stage, moot.

1. Vision 2040 or Vision 2035.

Each of the three documents references “Vision 2040” throughout. As such, the projected future addressed by the DGP/DEIR/DIA seems to be up to the year 2040. Yet, on the webpage of the General Plan Update, the very first sentence states, “The City of Alhambra has kicked off its Comprehensive General Plan Update branded as Vision 2035 – A Community’s Mosaic.” There is even a graphic with the 2035 year on the webpage. The discrepancy between the website year (2035) and the year referenced in the documents themselves (2040) seems to us to be a material error. Please clarify.

2. Lack of Housing Element.

As noted in the documents, and as confirmed in the most recent public hearing held on September 11, 2018, the DGP/DEIR do not address the mandated Housing Element because that is subject of a separate update stated to occur sometime around 2020/2021. While the consultant (Rincón) noted at the September 11, 2018 meeting that the DGP/DEIR had been reviewed “for consistency” by one of its staff with the City’s current Housing Plan, we do not believe that this vague assurance (which is not documented in any detail that we could find) is enough. It is our opinion that omitting the Housing Element in the DGP/DEIR/DIA is a fatal flaw. As is clear, the citizens of Alhambra have waited roughly 30 years since that last update of the GP. As such, we believe that waiting a bit longer to assure that the Housing Element is completely addressed within the DGP/DEIR in a comprehensive manner, is the only path forward. Without that, for the reasons stated below, the

concepts presented in the DGP and the “analyses” presented in the DFR, setting aside their other problematic issues, are not meaningful.

We note that Housing is a Required Element that must be addressed in the GP and its accompanying EIR. This is clear in the General Plan Guidelines issued by the Governor’s Office of Planning and Research (“OPR”). The reason that the Housing Element is a Required Element is obvious and clear from the OPR Guidelines:

“Housing element updates must be consistent with other general plan elements, including the land use element and diagrams. Integrating considerations of general plan goals and policies through the housing element and each update may improve efficiency by ensuring consistency. Additionally, incorporating a holistic view of the document will allow the housing element to complement other elements in addressing challenges such as climate change mitigation and adaptation, and working towards local goals, such as promoting infill development, Transit Oriented Developments, and healthy, safe, and equitable communities.”

The OPR Guidelines show how intimately the Housing Element correlates with the other elements of the GP:

<table>
<thead>
<tr>
<th>CORRELATIONS AMONG ELEMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing</td>
</tr>
<tr>
<td>---</td>
</tr>
</tbody>
</table>

- Identified in statute
- Closely related to statutory requirements

As seen above, the OPR Guidelines simply state the obvious — namely, that without the inclusion of the Housing Element, there can be no meaningful consideration of the statutory elements (Land Use and Environmental Justice) or the five other elements (Circulation, Conservation, Open Space, Noise, and Safety) which are closely related to statutory requirements.

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2. Ibid., p. 89.
3. Ibid., p. 89.

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Thus, we believe the failure to collectively address the housing element within the DGP is a fatal flaw, with legal ramifications. It is so glaring that it renders all three of the Draft documents meaningless.

3. Mission Road Linear Park/Open Space.

The Open Space discussions in the DGP are simply confusing. First, on page 53 of the DGP, it is stated that the city has “more than 200 acres” of parks. However, no breakdown of how this number was arrived at is provided in the DGP. We note that the Los Angeles County survey of Alhambra Park Space, which does include a detailed breakdown of the various parks in Alhambra (and Moor Field, which is not a publicly-accessible park), shows a total of 77.9 acres. Excluding Moor Field drops the acreage down to closer to 60 acres. Thus, the DGP’s data are simply unreliable.

In the same discussion, the DGP also notes that there is 270 acres of open space. Yet, it provides no breakdown and, importantly, whether “open space” is accessible and usable by the public.

The simple fact is that, by any metric, usable open space in the City is highly deficient. The County summary referenced above notes that while Alhambra has 0.9 park acres per 1000 population, the County average is 3.3 acres/1000 population.

In an attempt to bridge the large open space deficit, the DGP includes a conceptual idea of an elevated linear park over the existing and in- use rail lines adjoining Mission Avenue. It is noted under the “Mobility” (or Circulation) element, as shown in Figure 1 of the DGP. It is also noted as the “Railroad Cap Park” on page 43 of the DGP and briefly discussed on page 54 of the DGP. There are additional references to it in the DEIR and DIA as well.

It is GRA’s opinion, based on the professional experiences of our members, that this Linear Park idea (which, on paper only, “adds” acreage to the meagre open space in the City) is a non-starter.

We are not aware of any such Park (and none of the three documents provides any support) over existing and in-use rail lines anywhere over the world, much less of the length proposed in the DGP. The legal, engineering, safety, and other related challenges in ever implementing such a concept are so great that they simply cannot be overcome, even with vast expenditures, which are not discussed at all in the GP.

In effect, to address the chronic shortfall in the open space acreage in the City, the DGP simply suggests this “shiny object” which can never be realized — thereby misdirecting and diverting attention from the much more difficult task of actually dealing with the chronic open-space deficiency in the City. Tellingly, neither the City nor the consultant have had a meaningful conversation with the owners/operators of the railroad about this idea. We strongly doubt that there would be interest by the railroad to even entertain such an idea. On a process note, it is not clear whose idea this Linear Park was — whether the City’s or the consultant’s.\(^1\) Regardless who came up with it, simply on practical grounds, it has no place in the DGP.\(^2\)

As such, since at least the Open Space and Mobility/Circulation elements of the GP are directly affected by this Linear Park, per the earlier references in the DGP, its removal will drastically affect at least these aspects of the DGP.

We note that it is universally acknowledged that there is insufficient open space (whether on an absolute or a per-capita basis) in the City. In fact, some of the open space that is so designated does not properly qualify because it cannot be accessed by residents. We believe that the DGP (and DEIR) needs to provide a thorough and fact-based accounting of: (a) all potential open space that is available in the City; (b) the accessible/useable portion of (a); (c) benchmark metrics of the amount of per-capita useable open space needed (such as required by the County of Los Angeles and other authorities); (d) how the gap between what we have and what we need can be meaningfully addressed over time. We believe that the idea of “pocket parks,” as noted in the DGP

\(^1\) The discussion at the September 11, 2018 meeting seemed to confirm that the idea was never vetted by any engineer.

\(^2\) It is even more impractical than suggesting a cover or top deck on the portion of the 10 Freeway located within City limits to solve open-space and mobility issues.

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on page 54, is a good one. We disagree, however, that further exploration of this idea (Item QL7 in the DIA) should have only a "Medium" priority level.

In summary, the Linear Park concept should be removed from all of the documents. Affected sections and analyses should be redone. Accurate baseline data on total and accessible open space should be provided. Ideas to close the gap between current and needed open space, such as land acquisition (and funding) should be discussed more thoroughly. For these reasons, we find that the current DGP/DEIR/DIA to be fatally flawed.


The DGP, on page 4, states that, "By 2040, Alhambra is projected to add about 4,800 residents, 5,500 jobs, and 2,600 households" (referencing SCAG, 2016). However, as the DEIR in Section 2.3.6 makes clear, this 4,800 increase in population is from a 2012 estimated baseline. The DEIR makes clear that the population increase from the current (2017) baseline is 1,878 through 2040.\(^{13}\)

The DGP is misleading, given the use of the 2012 baseline.

It is our opinion that the projected increase in population of less than 2,000 residents is not grounded in reality. For example, we are aware of at least one proposed development which projects the addition of 1,100 residential units in just the next few years. Thus, this single development alone, with a reasonable two persons per residential unit assumption, would account for more residents than the projected 1,878 persons through 2040.

The DGP also notes that the 2016 population of Alhambra is 86,000. Additional population estimates are noted in Section 2.3.6 of the DEIR. We believe that these data (i.e., baseline population and anticipated growth) need more thorough support and vetting, given their critical impact on all of assumptions and analyses in the DGP/DEIR. Anecdotal data suggest that the current (2017) population of the City is significantly greater than 86,922 persons.

\(^{13}\) DEIR Section 2.3.6 and throughout.

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Since a proper estimate of current and projected population increases (along with Housing, previously discussed) is fundamental to any meaningful analysis, we view these poorly vetted and thinly supported assumptions as unrealistic and therefore fatal to the DGP/DEIR and the impacts discussed in the DEIR. This is yet another reason to go back to the drawing board.


Greenhouse gas emissions and climate impacts are addressed starting on Page 72 of the DGP and the next couple of pages. The DEIR discusses this topic in Section 4.5. Table 13 in the DEIR states that the projected increase in greenhouse gas emissions is 60,845 tons, from “forecast growth.” While the DEIR concludes that this increase, as normalized on a per-capita basis of 4.0 metric tons of CO2e/person, does not exceed the CEQA threshold (also, not-so-coincidentally, also 4.0 metric tons/person), and that therefore there is no exceedance of the threshold, we believe that the analysis relies largely on unsupported or inconsistent assumptions and indicates a forced arrival at a predetermined result.

We do not believe that the greenhouse gas analysis reflects direction from the OPR which requires a reduction in greenhouse gases, including enforceable mitigation measures to achieve this. We did not find any enforceable measures to overcome the projected 60,845 tons of increase in greenhouse gases in either the DGP or the DEIR or the DIA.

For more discussion on this, we point the City of comments provided by the California Attorney General’s office in relation to the Martinez Valley West Specific Plan EIR, dated September 6, 2016, Section D. While the directly applicable comments by the state Department of Justice/AG are too numerous to include here, they are directly pertinent to the very thin “analysis” of greenhouse gas emissions in the DEIR, especially dealing with the lack of identification of all potential

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14 As an example of inconsistent assumptions, this greenhouse gas analysis notes (DEIR, Table 12) that there will be 2040 multi-family dwelling units added, along with 360 additional single-family dwellings by 2040. However, in Appendix C to the DEIR, Table 1 indicates the addition of 500 single-family and 3020 multi-family units by 2035.

15 Available at https://opg.co.gov/sites/default/files/attachment/environmentalcomments/martinez-valley.pdf

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Final Environmental Impact Report
mitigation measures and the lack of enforceability of mitigation measures which are identified. It is our view that, unless significantly modified to be consistent with state law, this aspect of the DGP poses considerable potential legal risk.

6. Traffic/Mobility.16

In discussions with both GRA members and the community at large, adverse traffic impacts are perhaps the most vexing of all issues affecting residents. There is simply no doubt that traffic conditions today are bad17 and have deteriorated in most parts of the City and especially so towards the south-western portion of the City. It is therefore distressing to see that the traffic analysis presented in the DEIR simply accepts as fact that currently unacceptable traffic conditions in many of the areas of the City will not only not be improved, but will in fact simply deteriorate further,18 with no possible mitigation.

The DIA identifies 9 strategies dealing with traffic (numbered M1 through M9). All are vague and none are actionable in our opinion. We ask the City to demonstrate how any of these are actionable. Except for M1, dealing with identifying grant funding to improve the existing traffic signal system, which is shown as a High priority and ongoing item, the rest are all “Medium” priority. The City should clarify how these priority assignments were arrived at.

Digging a bit deeper, the DEIR discusses the Traffic Impact Analysis (TIA) in Section 4.12. We have the following specific questions and seek clarification:

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16 We understand that the DGP, DEIR, and DIA also use the term “mobility” but we choose to use the more reliable term traffic to discuss what is an issue in this regard.

17 See, for example, Table 30 of the DEIR with many intersections with Level of Service (LOS) at E or F, indicating close to capacity or over-capacity. We do not agree that only the 9 intersections and 4 roadway segments noted on page 230 of the DEIR represent the only LOS F and G intersections/roadway segments in the City. There is no statement in the DEIR that suggests that there are many additional such intersections and roadway segments recognizing the limited data collected for current/baseline conditions. We ask the City to prove us wrong in this regard.

18 See, for example the discussion of the 14 intersections identified on page 241 of the DEIR, the 21 intersections identified on page 243 of the DEIR, and the roadway segments identified on page 249 of the DEIR.

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430
(a) Section 4.12.1 states that a total of 45 intersections and 34 road segments were identified by the consultants for the TIA. Yet, there is no discussion of how these intersections and roadway segments were selected to begin with and whether or not these are representative of baseline conditions, especially in the more impacted areas in the south-west portion of the City. An excerpt from DEIR Figure 40, shown below, confirms that there is a general void in the identified intersections and road segments from the south-west portion of the City, shown in the red circle.

(b) Section 4.12.1(b) in the DEIR states: “The analysis of operations at the study intersections was conducted for weekday a.m. and p.m. peak-hour conditions. Traffic counts were conducted for this study on May 21, 2015, and the year 2017 was defined for existing conditions.” (emphasis added) We do not believe that data collected in 2015 can magically represent conditions in 2017. We ask the City to explain how data collected on just one day in May, 2015 (with no explanation as to
how representative even this one day was in 2015) can represent existing conditions in 2017. We believe that this “assumption” is another of the many fatal flaws in the DEIR’s impact analysis.

(c) We ask the City to clarify the following underlined statements in Section 4.12 of the DEIR:

“While analysis of peak-hour LOS was used in this impact analysis, the Plan would generally not increase per-capita vehicle miles travelled (VMT) because it would focus future development in focus areas emphasizing walkability and a mix of uses to connect neighborhoods and reduce vehicle use in those areas, while maintaining the City’s other established neighborhoods (for further discussion of this topic see Impact A(1)). The Plan also includes policies intended to increase the use of alternative transportation and shorten vehicle trips throughout the City, causing a decrease in VMT. These policies are discussed under Impact GHG-1 in Section 4.5, Greenhouse Gas Emissions of this EIR.”19 (emphasis added)

Specifically, we ask how these strategies would actually and enforceable be imposed on all “future developments” through 2040. In fact, we are skeptical that any of these ideas will actually be required of any future developments.

And, further, to the extent that the DGP mentions making the City more bicycle friendly, we note that with the removal of the Linear Park discussed earlier – which would remove almost all of the Class 1 bike segments in the City20 – there is really no substantial change in the already-poor bicycle use capability in the City, without risking life and limb. We expressly therefore reject the idea that the City can magically become more bike-friendly, and then use this assumption in reducing traffic, air quality, and greenhouse gas impacts, as has been done in the DGP/DEIR.

(d) Given the myriad assumptions used in the TIA, it is not surprising that many of the results of the TIA are not plausible. We provide but one such example – namely, the analysis for the intersection of Atlantic Blvd and Main Street. Table 30 shows the Intersection Capacity Utilization (ICU)21) for baseline, i.e., 2015, conditions as: 0.797 (AM peak) and 0.856 (PM peak). Table 35

19 DEIR, Section 4.12, p. 227.
20 See DEIR, p. 256.
21 We note that this term is not shown in the list of abbreviations in the DEIR and first appears on page 227.
shows the data for this intersection under 2040 conditions. Implausibly, the AM peak ICU is shown as 0.772 in 2040 – an marginal improvement over the 0.797 in 2015 conditions, while PM peak ICU in 2040 is shown as 0.596, representing a dramatic deterioration in 2040 from the 0.856 ICU in 2015. These results are simply not internally inconsistent – why should the same intersection show an improvement in the AM peak ICU, itself implausible, over the 25 year period between 2015-2040, but show such a dramatic deterioration in the PM peak ICU. While this is only an example, we ask the City to explain how this can be. As well, we ask the City to discuss similar, other, implausible results, which are nothing more than artifacts of implausible inputs.

Taken as a whole, the TIA, even with all of its methodological flaws, some of which we have discussed above, shows that traffic conditions in many parts of the City will simply deteriorate through the 2040 time frame, with adverse consequences for other impacts such as air quality, greenhouse gases, and the like. It is our opinion that the DGP and DIA simply do not consider the more difficult mitigation measures – i.e., involving increases in roadway capacity – that can meaningfully reduce traffic impacts. Simply assuming, as the DEIR and the DGP do, that citizens will simply be walking and biking more, with no plan or evidence, is not a strategy.

7. Lack of Responsiveness to Citizen Input.

In addition to the fatal flaws noted above, and our overall comment on the inadequacy of community engagement in the development of these plans, we note that in at least two additional aspects, the DGP/DEIR/DIA are simply not responsive to concerns raised by Alhambra citizens, even those put forth during the limited community engagement outreach done by the City.

First, the preservation of historical structures in the City (of which there are fewer and fewer each passing year) is given short shrift and does not reflect the apparent commitment City has given to citizens in the past. The DIA’s implementation plans in this regard (i.e., R4 and R5) are so vague and dilute as to be meaningless. The contradiction between the “Medium” priority level and the “Near-Term” timeframe for these two strategies is not reconcilable. We support the more detailed comments on this aspect provided by the Alhambra Preservation Group.

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Second, the DGP allows for development of additional hotels in portions of the City, based on certain vague notions (supposedly supported by economic analysis provided as “Market Studies” in Appendix C to the DEIR) which we have reviewed and do not find persuasive. This preliminary real estate market overview was done in 2015 at the inception of the GP update process and addresses hotels in about a page worth of very weak “analysis.”

Summary

In summary, we note that, based on just the identified fatal flaws, the DGP, the DEIR, and the DIA need substantial revision. We believe that the timeline for the General Plan Update and the Housing Element Update need to be reconciled, even at this risk of delaying the completion of the GP Update. (Frankly, since none of the implementation strategies are imminent anyway, we do not see the rush to finalize these documents in their present, flawed form.) Wider consultation with the community might result in a better set of products and avoid both technical and legal risks.
8.16 Letter 16

COMMENTER: Jose Aguayo, President, Grassroots Alhambra

DATE: October 3, 2018

Response 16.1

The commenter notes that comments are provided on the draft General Plan, Implementation Actions and EIR and describes Grassroots Alhambra.

This comment is acknowledged. Specific concerns are addressed in responses 16.7 through 16.18.

Response 16.2

The commenter states disappointment in the draft General Plan, suggesting that it is simply a set of concepts rather than a plan.

This comment is noted, but a meaningful response to this general concern is not possible. Specific concerns are addressed in responses 16.7 through 16.18.

Response 16.3

The commenter suggests that proposed Implementation Actions are not binding, questions their prioritization, and states an opinion that the qualitative timeframes and lack of resource discussions make the strategies “meaningless.”

The fact that the Implementation Actions are not in the draft General Plan itself does not make them non-binding. These would be adopted separately, but would involve commitments by the City, just as the General Plan would. Removing implementation actions from the General Plan is common practice in California because doing so makes it easier to update the actions on a more regular basis without having to go through a General Plan amendment process. In this way, the City can more readily refine actions to which it is committing to reflect changing conditions and priorities.

The prioritization of draft Implementation Actions is based on staff judgment and perceptions of what decision maker priorities are. However, City decision makers may choose to re-prioritize any or all of the proposed actions (or to add or delete actions). It is not clear what the commenter means by “lack of resources,” but the Implementation Actions document includes a list of potential funding sources for various actions.

Response 16.4

The commenter suggests that the project needs to be defined better in order for the Draft EIR analysis to be meaningful and suggests that assumptions are unsupported and discussions are inconsistent.

The draft General Plan lays out a general vision for the City and the Draft EIR analyzes the potential impacts associated with implementing that vision. Out of necessity, such “programmatic” analysis requires making certain assumptions since the actual amount, type, and locations of future development are not known. Absent more specificity regarding which assumptions the commenter believes need further support or what inconsistencies the commenter believes are present in the document, a more meaningful response to these general concerns is not possible.
Response 16.5

The commenter again suggests that the draft General Plan, Implementation Actions, and Draft EIR are flawed and “un-approvable.” These opinions are again noted. The commenter’s specific concerns area addressed in responses 16.7 through 16.18. City decision makers will ultimately decide whether the draft General Plan will be approved.

Response 16.6

The commenter states concerns about the General Plan process, noting that another City had substantially more public workshops during the preparation of its General Plan and requests that the City address each of his comments.

Every general plan process is different, reflecting the desires of the community, budget for the assignment, and other factors. The process that the City has followed is not atypical for general plans, though it is true that some communities have much more expansive public outreach programs than others do. It should be noted that in addition to the four public workshops, the General Plan team undertook a community survey (both a telephone survey and an online survey), participated in various community events, held one-on-one meetings with a number of key stakeholders, and held workshops and meetings with City decision makers and staff. Specific comments are addressed in responses 16.7 through 16.18.

Response 16.7

The commenter suggests that the 2040 horizon year for the General Plan is in error. The year 2040 is the correct horizon year for the General Plan. At the beginning of the process, 2035 was considered the likely horizon year, consistent with the horizon year of the then current Southern California Association of Governments’ Reginal Transportation Plan/Sustainable Communities Strategy (SCAG RTP/SCS). However, during the preparation of the draft General Plan, SCAG adopted a new RTP/SCS with a 2040 horizon year so it was determined that the General Plan horizon year should be changed to 2040 as well. Any remaining references to 2035 are in error and will be corrected as part of the final General Plan. The data and analysis contained in the Draft EIR reflect the forecasts contained in the 2016 RTP/SCS and 2040 horizon year.

Response 16.8

The commenter states a concern that the Housing Element is not being updated as part of the draft General Plan, suggests the OPR Guidelines indicate that the Housing Element must be updated as part of the General Plan, and suggests the City should wait to adopt a new General Plan at the same time the Housing Element is updated.

The concern is noted. However, as has been noted throughout the process, the draft General Plan does not conflict with the current Housing Element and, when the Housing Element is updated, the City will verify consistency of the update with other General Plan chapters/elements. As necessary, any goals or policies that may be inconsistent with the new Housing Element can be amended at that time.

The OPR Guidelines to which the commenter refers state that the Housing Element must be consistent with other elements, not that it must be updated at the same time as other elements. Cities commonly update individual elements rather than conducting comprehensive updates to
every General Plan element. The Housing Element, in particular, is unique among General Plan elements insofar as it must be updated every five to eight years whereas other elements are typically updated only every 20 or so years.

**Response 16.9**

The commenter states confusion about the open space discussions in the draft General Plan, notes a deficiency open space in the City, and states skepticism about the feasibility of a linear park along the railroad right-of-way.

As the draft General Plan and Draft EIR acknowledge, open space in the City and opportunities to add open space are limited. This is why the draft General Plan examines various options for developing new parks and open space, including the linear park concept. However, in response to this and other community concerns, the linear park concept has been removed from consideration. Other concepts, including development of pocket parks, future conversion of school sites to parks, and possible development of a regional park at the 710 stub, will remain.

The 270 acres of open space indicated in the draft General Plan and Draft EIR includes all acreage designated Open Space on the General Plan land use map. The 200 acres of parks includes City parks as well as the golf course. It is acknowledged that this discussion is not clear so this has been clarified in the final General Plan and Final EIR. Removing the linear park concept will, of course, adjust the overall potential open space and park acreage in the City so the numbers in the Final EIR differ from those in the Draft EIR. This change in overall acreage does not, however, modify the overall EIR finding with respect to parks.

**Response 16.10**

The commenter notes that the draft General Plan includes baseline data from 2012 as reported by SCAG, but that the Draft EIR includes 2017 population data showing a higher population. The commenter also suggests that a single development proposal in the City may account for more than the forecast level of population growth. Finally, the commenter suggests that anecdotal evidence suggests that the current population of the City is higher than what is reported in the Draft EIR.

It is true that the draft General Plan shows data from SCAQ forecasts, which are based on SCAG’s 2016 RTP/SCS. The Draft EIR also shows this data, but also includes data from the California Department of Finance (DOF) regarding its estimates of the City’s 2017 population. All population estimates (including the SCAG and DOF data reported in the Draft EIR) are estimates that have a certain margin of error. SCAG population estimates and forecasts presented in the draft General Plan are shown in order to provide a consistent framework from which population can be considered. However, this data is simply informational and reflects what is presented in SCAG’s 2016 RTP/SCS. The 2017 DOF information included in the Draft EIR is used in order to provide a more current baseline against which General Plan impacts can be evaluated.

**Response 16.11**

The commenter states an opinion that the Draft EIR greenhouse gas analysis relies on unsupported and inconsistent assumptions and believes that the measures aimed at greenhouse gas reduction are unenforceable.

The specific example noted by the commenter is simply a point of confusion. Table 12 in the Draft EIR indicates that land use assumptions upon which the greenhouse gas analysis are based. Table 1 in Appendix C of the Draft EIR shows an earlier set of assumptions upon which the market analysis
conducted early in the General Plan process was based. The assumptions regarding forecast growth used in the Draft EIR analysis are from a memo update to that study, dated 5/31/17. That memo is also included in Draft EIR Appendix C.

With respect to enforceability, all policies contained in an adopted General Plan become official City policy. While it is true that some of the policy language contained in the draft General Plan is specifically intended to allow City decision makers some flexibility, the draft General Plan clearly points the City in the direction of focusing new development in the City along existing commercial/mixed-use corridors to create a generally more walkable, transit-oriented community. The greenhouse gas analysis in the Draft EIR reflects this general direction, though it should be recognized that the General Plan is not a greenhouse gas reduction plan that would preclude project-level greenhouse gas analysis of individual projects in the City. New development will continue to be subject to project-level greenhouse gas analysis as part of individual project-level CEQA reviews.

Response 16.12

The commenter states a concern about the Draft EIR finding of unavoidably significant traffic impacts, states an opinion than strategies to deal with traffic are not actionable, and asks how priorities for actions were derived.

The Draft EIR concludes that traffic impacts associated with growth forecast under the draft General Plan would be significant and unavoidable since a number of locations in the City would continue to experience poor levels of service that would be exacerbated by growth under the General Plan. The Implementation Actions that accompany the draft General Plan are all feasible actions that can be implemented over the life of the draft General Plan. However, the Draft EIR analysis acknowledges that these actions are not sufficient to achieve desired service levels at all locations. Because City staff is unaware of other physical improvements that would avoid significant traffic impacts, City decision makers will need to adopt a Statement of Overriding Considerations setting forth the reasons the General Plan’s benefits outweigh this impact if they elect to approve the General Plan. It should be noted that, although growth under the General Plan would incrementally contribute to poor service levels on the City’s road network, poor service levels are primarily due to regional traffic. Also, it is important to remember that the impacts of implementing the draft General Plan would be similar to those associated with continued implementation of the existing General Plan.

The prioritization of action items reflects staff’s best judgment as to how the various actions can and should be implemented.

Response 16.13

The commenter states that there is no indication of how traffic study locations were selected and notes a lack of study locations in the southwest portion of the City.

Study locations were developed by the General Plan traffic consultant in consultation with City staff. Locations selected are those that currently have high traffic levels and/or are expected to experience the greatest traffic increases over the life of the General Plan. The southwestern portion of the City is expected to experience relatively little traffic growth through 2040 compared to other areas of the City.
Response 16.14
The commenter asks how data collected on one day in 2015 is representative of traffic conditions in 2017.

Collection of data on one day is not unusual for traffic impact studies. The selected day was in coordination with City staff and was deemed a typical day with respect to traffic conditions. As noted on page 18 of the traffic impact analysis in Appendix F of the Draft EIR, an annual ambient growth based on Southern California Association of Governments’ model growth was added to these volumes to develop baseline volumes for the traffic study.

Response 16.15
The commenter asks how the draft General Plan will require all future projects to focus development in areas that emphasize walkability and a mix of uses, thereby increasing the use of alternative transportation modes. The commenter also suggest that the City can “magically become more bike friendly.”

The draft General Plan does not “require” all projects to focus development in areas emphasizing walkability and alternative transportation modes. However, by emphasizing that existing residential neighborhoods are generally to remain intact while change and development is to be focused along key commercial/mixed use corridors and in “nodes” along these corridors, the draft General Plan prioritizes development in areas with a mix of uses and that are along existing transit corridors (e.g., Main Street, Valley Boulevard, Fremont Street). Although the emphasis on development in these corridors/nodes would generally be expected to enhance the community’s walkability, no calculations of air pollutant or greenhouse gas emissions have given specific credit for these characteristics.

The draft General Plan includes policies to make the City more bike friendly, but it is acknowledged that making the City more bike friendly is a substantial challenge in light of the high traffic levels present throughout much of the City and concerns about bicycle safety. The linear park concept to which the commenter refers has been removed from the General Plan based on comments received from the community.

Response 16.16
The commenter questions the traffic impact analysis conclusions regarding the Atlantic Boulevard/Main Street intersection, notes that traffic service levels will deteriorate, and states that the draft General Plan should consider increases in roadway capacity to address traffic.

The difference in in the conclusions for the AM and PM peak hours is due to the shifts in traffic associated with anticipated changes in land use and development patterns under the draft General Plan land use plan. The future base (without the plan changes) shows a slight worsening of operations, but with the anticipated land use plan changes there is a small improvement. This is because different types of uses create different patterns of AM peak and PM peak trip generation. For example, commercial development that is anticipated to affect traffic levels in the vicinity of Atlantic Boulevard/Main Street generates relatively high levels of PM peak hour traffic, but relatively little AM peak hour traffic. Of course, it must be recognized that the data presented in the Draft EIR are forecasts based on the best available information about what type of development may occur in the City and where such development might be located. Actual traffic impacts of individual future developments will be addressed on a case-by-case basis as developments are proposed and will likely differ to some degree from what is presented in the Draft EIR.
It is true that service levels are forecast to generally deteriorate over the life of the draft General Plan. The Draft EIR acknowledges this and City decision makers will need to adopt a Statement of Overriding Considerations if the elect to approve the General Plan. City staff have considered road capacity improvements and will continue to try to identify feasible physical improvements for specific traffic issues on a case-by-case basis; however, in a built out community like Alhambra, the ability to substantially enhance capacity is limited by a variety of physical and legal constraints.

Response 16.17

The commenter states concerns about a perceived lack of community engagement and responsiveness to community concerns. The commenter also states support for comments from the Alhambra Preservation Group. Finally, the commenter states that the market analysis that addresses hotels is unpersuasive.

The concern about community engagement is noted. In addition to the four public workshops, the General Plan team undertook a community survey (both a telephone survey and an online survey), participated in various community events, held one-on-one meetings with a number of key stakeholders, and held workshops and meetings with City decision makers and staff. Staff has attempted to balance the sometimes competing interests of various communities members in developing the draft General Plan. This of course means that not everything that every individual wants is included in the Plan.

Please see the responses to Letter 12 from the Alhambra Preservation Group.

The comments about the hotel concept are noted and will be considered by City decision makers. The market study conducted as part of the General Plan concludes that the City could accommodate additional hotels and the community survey indicated that 43.3 percent of Alhambra residents believe the City has too few hotels, 50.3 percent believes the number of hotels is about right, and 6.4 percent believe the City as too many hotels. While this indicates that the majority of residents do not believe new hotels are needed, the only land uses for which residents more strongly felt more is needed are entertainment uses (65.7 percent) and retail stores (44.1 percent). It should be noted that any hotels built in the City would have to comply with current Code restrictions related to building height and massing. The concept envisioned in the draft General Plan is to accommodate “boutique” hotels, not larger hotels such as those recently construction or planned in neighboring cities.

Response 16.18

The commenter reiterates an opinion that the draft General Plan, Implementation Actions, and Draft EIR need substantial revision and that approval of the draft General Plan should be delayed until the Housing Element update is part of the Plan.

This opinion is again noted. Please see the above responses. Response 16.8 addresses the Housing Element.
Letter 17

September 14, 2018

Vanessa Reynoso
Department of Community Development
City of Alhambra
111 S. First Street
Alhambra, CA 90041


Dear Ms. Reynoso:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Alhambra General Plan, Vision 2040 – A Community Mosaic (Plan), located in the City of Alhambra (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

The purpose of this letter is to briefly describe the proposed Plan, based on the Notice of Availability of a Draft EIR, and to outline recommendations from Metro concerning issues that are germane to our agency’s statutory responsibility in relation to our rail and bus facilities and services that may be affected by the proposed Plan.

Plan Description

The proposed Plan is a comprehensive update of the City’s General Plan, and provides a vision for the future of Alhambra over the next 20 years. The only part of the City’s current General Plan that is not being updated is the City’s 2013-2021 Housing Element, which is subject to a unique set of statutory requirements and was updated more recently than the rest of the General Plan.

Metro Comments

The following section outlines key considerations for properties and streets adjacent to Metro transit facilities and service in the Plan Area. In addition to the specific items outlined below, Metro would like to provide the City with a user-friendly resource, the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW), as well as the Adjacent Construction Manual with technical information for development near our facilities (also attached). These documents and additional resources are available at www.metro.net/projects/deereview/.
1. **Bus Operations:** The following Metro bus lines 76, 78, 79, 176, 258, 260, 378, and 485 operate within the Plan area. To provide safe and convenient bus service, Metro recommends that the Specific Plan include language that requires future development to inform Metro of projects in close proximity to bus stops or other bus facilities that could impact operations. The Adjacent Development Handbook provides recommendations for bus stop design and coordination needs. For streets where Metro provides bus service, Metro recommends that the City design outside right lanes to be 12 foot wide (or at minimum 11 foot wide) for bus travel.

2. **Rail Operations:** It is noted that Metro-owned Railroad ROW is within the Plan boundaries. The ROW is operated and maintained by the Southern California Regional Rail Authority (SCARRA) to run the Metrolink commuter rail service and Union Pacific Railroad freight trains 24 hours a day, seven days a week. To ensure safe, uninterrupted service, Metro suggests that the Plan include policy language to require Metro review and clearance of development occurring within 100 feet of Metro-owned ROW. Metro has similar review and approval rights for development within the City of Los Angeles per Zoning Ordinance Z1-1117. In addition, Metro recommends the Plan include language requiring a recorded Easement Deed in favor of Metro prior to the completion and/or occupancy for developments within the 100 feet of Metro ROW.

3. **Transit Amenities:** Metro strongly recommends that the Plan include policies encouraging transit-supportive public realm improvements, such as wide sidewalks, bus shelters, comfortable seating, pedestrian-scaled lighting, landscaping (i.e., street trees that provide continuous shade along transit access routes), multi-modal wayfinding signage (directing people to transit stops and stations, and from transit facilities to points of interest in the surrounding neighborhood), and enhanced, ADA-compliant street crossing elements adjacent to transit stops and stations (i.e., enhanced crosswalks, crossing signals, and accessible ramps). The City of Alhambra should consider requiring the installation of such amenities as part of the conditions of approval for development within the Plan area.

4. **Active Transportation:** Metro encourages the City of Alhambra to promote bicycle use through adequate short-term bicycle parking, such as ground level bicycle racks and/or curbside bicycle corrals, as well as secure, access controlled, enclosed long-term bicycle parking for guests, employees, and residents of high-density residential, retail/commercial, or mixed-use developments. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be safely and conveniently accessed. Additionally, the Plan should help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from destinations within the Plan area.

5. **Parking:** Metro strongly encourages that the Plan require or incentivize transit-oriented, pedestrian oriented parking provision strategies, such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities to reduce auto-oriented design and travel demand.

6. **Wayfinding:** Metro recommends that the Plan include provisions for wayfinding signage to direct people to transit services. Any planned wayfinding signage with content referencing Metro services, or featuring the Metro brand and/or associated graphics (such as bus or rail pictograms) must conform to Metro’s Signage Standards and requires review and approval by Metro Art & Design. Please contact Lance Glover at 213-922-2350.
7. **Art:** Metro Arts & Design encourages the thoughtful integration of art and culture into public spaces and will need to review any proposals for public art and/or placemaking facing Metro ROW. Please contact Susan Gray at 213-922-2729.

Metro looks forward to continuing to collaborate with the City of Alhambra to effectuate policies and implementation activities that promote transit-oriented communities. If you have any questions regarding this response, please contact Edi Zepeda at 213-418-3484 or by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review  
One Gateway Plaza MS 99-23-4  
Los Angeles, CA 90012-2952

Sincerely,

Georgia Sheridan, AICP  
Senior Manager, Transit Oriented Communities

Attachments and links:
- Adjacent Construction Design Manual
8.17 Letter 17

COMMENTER: Georgia Sheridan, AICP, Senior Manager, Los Angeles County Metropolitan Transportation Authority

DATE: September 14, 2018

Response 17.1

The commenter states that Metro is committed to working with communities to promote walkable, transit-oriented communities and describes the purpose of the letter and the draft General Plan. The comments are noted. The draft General Plan is aimed at promoting a walkable, transit-oriented community to the degree feasible given the physical constraints present in the City and the community’s location in the heart of a major metropolitan area.

Response 17.2

The commenter suggests inclusion of a policy requiring future developers to inform Metro about projects in proximity to bus stops/facilities. In response to this comment, the following policy has been added to the General Plan:

Policy M2-G: Coordinate as appropriate with Metro regarding bus routes and bus stop/facility location and design.

Response 17.3

The commenter suggests requiring Metro review of development within 100 feet of Metro-owned right-of-way. In response to this comment, the following policy has been added to the General Plan:

Policy M2-H: Coordinate with Metro as required regarding development in proximity to Metro rights-of-way.

Response 17.4

The commenter recommends requiring installation of sidewalks, bus shelters and related amenities as conditions of approval for future projects.

Response 17.5

The draft General Plan includes various policies aimed at enhancement of sidewalks and transit facilities, new bike facilities, and other enhancement (such as landscaping) that would make the community more pedestrian, bike, and transit friendly. The City routinely requires these types of improvements as conditions of approval.

Response 17.6

The commenter encourages the City to promote bicycle use.

The draft General Plan includes a conceptual bike network and a specific policy (M-2F) promoting implementation of the network. In response to this comment, the following has been added to this policy:

The bike network will include, as appropriate, enhancements to bicyclist safety and bike parking.
Response 17.6

The commenter encourages methods to reduce auto-oriented design by restricting parking.

The draft General Plan does not include specific provisions to restrict parking or eliminate minimum parking standards, but includes policies M-3A and M-3B, which require continual re-evaluation of parking requirements and maintenance of standards that meet demand, but do not unnecessarily encourage use of the drive-alone automobile.

Response 17.7

The commenter recommends inclusion of policies regarding wayfinding signage.

Policy LU-5A of the Land Use & Community Design chapter encourages a unified sign program to help orient visitors. This policy has been revised to read as follows:

Policy LU-5A   Implement a unified sign program to help orient visitors throughout the community, including directional signs, information and historical interpretive signs, and freeway and transit identification signs.

Response 17.8

The commenter notes that Metro will need to review proposals for public art and/or placemaking facing Metro rights-of-way.

This comment is noted. The City will continue to coordinate as appropriate with Metro regarding public art and/or placemaking.