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Mitigated Negative Declaration

# **Kaiser Permanente Baldwin Park Emergency Department Expansion and Medical Office Building**

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**MARCH 2023**

*Prepared for:*

**CITY OF BALDWIN PARK**

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# Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ACM	asbestos-containing materials
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
AF	attenuation factor
AHU	air-handling unit
AQMP	Air Quality Management Plan
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
CO <sub>2</sub> e	carbon dioxide equivalent
COC	contaminant of concern
CSMD	Consolidated Sewer Maintenance District
CUP	conditional use permit
CUPA	Certified Unified Program Agency
dBA	A-weighted decibel
DTSC	Department of Toxic Substances Control
ED	emergency department
EIR	Environmental Impact Report
EO	Executive Order
ESA	Environmental Site Assessment
ESL	Environmental Screening Level
FAR	Floor Area Ratio
FC	Freeway Commercial
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
GC	General Commercial
GHG	greenhouse gas
GSF	gross square footage
HARP2	Hotspots Analysis and Reporting Program Version 2
HCAI	Health Care Access and Information
HFC	Hydrofluorocarbon
HFHSZ	high fire hazard severity zone
HRA	health risk assessment
HVAC	heating, ventilation, and air conditioning
ITE	Institute of Transportation Engineers
kWh	kilowatt-hours
LACM	Natural History Museum of Los Angeles County
LACoFD	Los Angeles County Fire Department

Acronym/Abbreviation	Definition
LBP	lead-based paint
LOS	level of service
LST	localized significance threshold
MGD	million gallons per day
MND	Mitigated Negative Declaration
MOB	medical office building
MRZ	Mineral Resource Zone
MT	metric tons
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NDMA	n-nitrosodimethylamine
NESHAP	EPA National Emission Standards for Hazardous Air Pollutants
NGVD	National Geodetic Vertical Datum
NOx	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
OEHHA	Office of Environmental Health Hazard Assessment
OSHPD	Office of Statewide Health Planning and Development
OU	Operating Unit
PCB	polychlorinated biphenyl
PCE	tetrachloroethene
PRIMP	Paleontological Resources Impact Mitigation Program
REC	recognized environmental condition
RSL	EPA Regional Screening Level
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SGVA	San Gabriel Valley Airport
SLF	Sacred Lands File
SOx	sulfur oxide
SRA	Source-Receptor Area
SVP	Society of Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
TCE	trichloroethene
UST	underground storage tank
UWMP	Urban Water Management Plan
VEC	vapor encroachment condition
VIMA	Vapor Intrusion Mitigation Advisory
VMT	vehicle miles traveled

Acronym/Abbreviation	Definition
VOC	volatile organic compound
WEAP	Workers Environmental Awareness Program

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# 1 Introduction

## 1.1 Project Overview

The proposed Kaiser Permanente Baldwin Park Emergency Department Expansion and Medical Office Building Project (project) involves improvements and the expansion of a current medical campus. The applicant, Kaiser Permanente, has proposed the expansion of the emergency department (ED) and the construction of a medical office building (MOB) at the current Kaiser Permanente Baldwin Park Medical Campus. The construction of the MOB would be a redevelopment of a former retail site located at the northwestern corner of the medical campus.

## 1.2 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA) requires that any project in the state of California determined to have the potential to result in adverse impacts to the environment be analyzed under the CEQA Guidelines and the results disclosed to the public (14 CCR 15000 et seq.; California Public Resources Code Section 21000 et seq.). A lead agency is determined under CEQA as the agency with greatest authority over the resources or land the proposed project is likely to impact, often a city, county, school district, or public resource agency. The proposed project would be required to complete environmental review under CEQA, led by the City of Baldwin Park, to identify and disclose potential environmental impacts associated with the proposed project.

The City has prepared this Mitigated Negative Declaration (MND) in conformance with Section 15070(a) of the CEQA Guidelines. The purpose of the MND environmental evaluation is to describe the proposed project, determine any potentially significant impacts associated with the proposed project, and incorporate mitigation measures into the project design as necessary to reduce or eliminate the potentially significant effects of the project.

## 1.3 Project Planning Setting

The project site is located within the City of Baldwin Park (City). The Baldwin Park 2020 General Plan and Baldwin Park Municipal Code guide and govern planning within the city. The project site is located within the South Coast Air Basin (SCAB) and is within the jurisdictional boundaries of SCAQMD.

## 1.4 Public Review Process

Pursuant to CEQA Guidelines Section 15105(b), the MND will be available for a public comment period of not less than 30 days from March 2, 2023, to April 1, 2023.

In reviewing the MND, affected public agencies and the interested public should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment, as well as ways in which the significant effects of the project are proposed to be avoided or mitigated.

Comments may be made on the MND in writing before the end of the comment period. Following the close of the public comment period, the City will consider this MND and comments thereto in determining whether to approve the proposed project. Written comments on the MND should be sent to the following address by April 1, 2023: [RGarcia@baldwinpark.com](mailto:RGarcia@baldwinpark.com)

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## 2 Project Description

### 2.1 Project Location

The Project is located at the Kaiser Permanente Baldwin Park Medical Campus in southern Baldwin Park, in Los Angeles County, California (Figure 1, Project Location). The entire project site is approximately 26.02 acres and occurs primarily on Assessor's Parcel Number 8559-006-006, 8559-008-011, and 8559-008-005. Project components would be concentrated in the northeastern (emergency department expansion) and northwestern (MOB) corners of the project site. The project site is bound by Dalewood Street to the north, Leorita Street to the West, Bess Avenue to the southwest, and Baldwin Park Boulevard to the southeast.

### 2.2 Environmental Setting

The project site is currently developed, consisting of a 24.48-acre medical campus (APN 8559-006-006) and a 1.54-acre site that consists of an abandoned retail building, herein referred to as the "Broken Horn site" (APN 8559-008-011 and 8559-008-005). The Broken Horn site is located adjacent to the existing medical campus to the northwest. The project site is zoned as Freeway Commercial (FC) and has a land use designation General Commercial. The site is relatively flat, and the site range elevation ranges from approximately 310 feet above National Geodetic Vertical Datum (NGVD). The project site is underlain by fill material, silty sand to poorly graded sand, and dense sand with varying amounts of gravels and cobbles (Appendix A, Geotechnical Investigation Report).

The project site is surrounded by existing development on all sides. The Interstate 10 (I-10) freeway is located just beyond Dalewood Street to the north of the project site, commercial uses are located south and east of the project site, and residential uses are located south and west of the project site.

Regional access to the project site is provided by I-10, which runs east-west adjacent to the project site, and I-605, which runs north-south, allowing for vehicular and transit access to the larger Los Angeles region. The project site is directly accessible via Dalewood Street, Leorita Street, and Baldwin Park Boulevard.

### 2.3 Project Characteristics

#### Overview

The project consists of two main components: an emergency department expansion and the construction of a medical office building (MOB), see Figure 2, Site Plan. The first component is the construction of an expansion to the emergency department, which is part of an existing hospital tower on the south end of the Kaiser Permanente campus. Expansion of the emergency department would add approximately 23,000 square feet to the existing emergency department, expand the number of existing treatment bays from 38 to 60, add a new ambulance canopy, and include additional improvements to the existing emergency department. The expansion and improvement of the emergency department would allow better functionality within the emergency department. The second phase of the project would consist of the construction and operation of an approximately 33,000 square foot MOB. This component would expand the boundary of the medical campus to include the Broken Horn parcel currently adjacent to the medical campus to the west. Development of this site would require the demolition of an existing retail building.

## Building and Site Design

As stated above, the emergency department expansion would increase the size of the existing emergency department by 23,000 square feet, resulting in a total square footage of an approximately 40,000 square foot emergency department. This addition would not add hospital bed licenses under the California Department of Health Care Access and Information (HCAI), formerly the Office of Statewide Health Planning and Development (OSHPD). The emergency department expansion exterior wall system assembly will be a combination of metal and composite panels and cement plaster finish on light gauge metal stud framing. Glazing will be a storefront type window system with low-E insulated glass.

The proposed two-story MOB would consist of a 33,000 square foot building. This component would expand the existing medical campus to the northwest on a property that includes an existing retail building. The MOB component would also include parking.

As a project design feature, buildings constructed as part of the proposed project would include installation of sub-slab vapor barrier systems, as described in the Vapor Intrusion Mitigation Advisory published by DTSC and CalEPA in 2011 (VIMA; DTSC and CalEPA 2011a). Vapor barriers will be designed to meet the standards outlined in the VIMA and will be in general conformance with General Construction, Membrane Installation, and Ventilation Trench for Passive Gas Control System Requirements of the Los Angeles County Methane Gas Mitigation Standards. The system would include a vapor barrier membrane and passive sub-slab venting system with the ability to be upgraded to an active system in the future, as necessary. The system will be designed by a California-licensed engineer. Installation would be overseen by a California-licensed engineer and would include testing for leaks and integrity of the system. Two sets of monitoring probes would be installed in each building, both above and below the barrier system, to evaluate the effectiveness of the system. Samples would be collected twice annually for the first two years of occupancy to verify adequate operation. Should results of monitoring probe sampling indicate vapor intrusion from sub-slab soil gas contamination, modifications would be made to the system to further increase ventilation and eliminate vapor intrusion. Refer to Section 3.9, Hazards and Hazardous Materials, for additional information.

## Vehicular and Pedestrian access

The emergency department expansion would include an additional emergency department walk-in entrance to the northwest corner of the emergency department. The new ambulance canopy entry is approximately 252 feet away from the existing member walk-in entry. Existing primary entry will continue to serve member walk-in to the emergency department. Vehicle entrance to the project site would remain the same as the existing entrance. The emergency department expansion would not impact the existing parking lot. The new ambulance bay would include an addition of four ambulance parking spaces.

Access to the MOB would occur via a driveway off Leorita Street, west of the MOB site. Parking would surround the MOB to the north, east, and west. After Phase I and demolition of the existing retail building on the Broken Horn site is completed, approximately 68 parking spots would be available for interim parking for hospital use until the beginning of Phase II. Upon completion of Phase II, parking would surround the MOB to the north, east, and west. Eighty parking stalls would be provided for ADA and member parking.

## Emergency Vehicle Access

Emergency vehicle access would remain the same as the existing conditions and would be located at the northeastern end of the medical campus off Dalewood Street. The emergency department expansion would include new ambulance parking and canopy to the northeast facing side of the proposed emergency department expansion. The current ambulance bay can hold three to four ambulances, but in some cases, there are up to six ambulances bringing patients into the emergency department. The addition of the ambulance canopy would provide an additional four ambulance spaces.

## Landscaping

All project landscaping would be consistent with Section 153.160.020 of the City of Baldwin Park Municipal Code, which establishes water efficient landscape standards. The project would include tree removal as a part of both project components. The City of Baldwin Park Tree Protection ordinance would apply to trees on the project site or any trees within the public right of way that are removed or damaged as a result of project implementation. Approval from the Director of the Public Works Department is required. All tree removal will be compliant with City of Baldwin Park Municipal Code Section 97.131. None of the trees that are expected to be removed as part of the project are located within the public right-of-way.

## Infrastructure Improvements

The emergency department expansion would include new asphalt on the medical campus at the existing emergency department access point and the existing ambulance overflow parking. The expansion phase would also include improvements to the existing emergency department's electrical, mechanical, plumbing, structural, fire and life safety systems.

## Off-Site Improvements

In addition to the emergency department expansion and construction of the MOB, the project would include off-site improvements that would be divided up among the two project phases and are included in Figure 3, Off-Site Improvements. The off-site improvements are described below.

The project would include the following off-site improvements during Phase I:

- Resurfacing asphalt bordering the medical campus along Baldwin Park Boulevard (Phase I)
- New ADA compliant ramp at the corner of Baldwin Park Boulevard and Bess Avenue.
- Two new ADA compliant ramps at the Baldwin Park Boulevard entrance to the medical campus.
- New sidewalk along Baldwin Park Boulevard from Bess Avenue to Dalewood Street.
- New sidewalk on the medical campus along the Baldwin Park Boulevard entrance to the campus.
- New sidewalk along Dalewood Street from Baldwin Park Boulevard to the end of the emergency department parking lot.
- New ADA compliant driveway along Baldwin Park Boulevard on the northeast side of the proposed emergency department expansion.
- Remove and replace damaged trees along project frontage on Baldwin Park Boulevard.
- Close the northwestern driveway on Bess Avenue

The project would include the following off-site improvements during Phase II:

- New sidewalk along Leorita Street from Bess Avenue to Dalewood Street
- Resurfacing asphalt along Leorita Street and Dalewood Street bordering the medical campus.
- Refurbish truncated domes along Dalewood Street (two locations).
- New ADA compliant ramp along Dalewood Street.
- New ADA compliant ramp at the corner of Dalewood Street and Baldwin Park Boulevard.

## 2.4 Project Construction and Phasing

The project would occur in two phases. All phases would include the use of Tier 4 equipment. Phase I would include activities on both portions of the project site. Phase I activities for the emergency department expansion component would include site preparation, emergency room expansion, emergency room renovation. Phase I activities for the MOB component would include the demolition of the existing retail building at the Broken Horn site and paving the MOB site. Additionally, Phase I would include the off-site improvements listed above. Phase I is estimated to occur over a 23-month period from May 2023 to April 2025. Upon completion of Phase I, 68 parking spaces will be available at the MOB site.

Phase II would focus on the MOB component and the remaining off-site improvements. Phase II would include site preparation of the Broken Horn site, grading, and construction of the MOB building. The Broken Horn site would have limited access and its 80-space parking lot would be used by Kaiser Permanente until construction of the MOB commences. Phase II is estimated to occur over an 18-month period from June 2028 to December 2029.

## 2.5 Project Approvals

The project would be subject to the following approvals for each phase:

### Phase I

- Design Review
- Lot Line Adjustment
- Conditional Use Permit
- Variance from Development Standards
- Amendment to the Kaiser Master Sign Plan

### Phase II

- Design Review
- Conditional Use Permit
- Amendment to the Kaiser Master Sign Plan

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# 3 Initial Study Checklist

**1. Project title:**

Kaiser Permanente Baldwin Park Emergency Department Expansion and Medical Office Building

**2. Lead agency name and address:**

City of Baldwin Park  
14403 East Pacific Avenue  
Baldwin Park, California 91706

**3. Contact person and phone number:**

Ron Garcia  
626.813.5253  
14403 Pacific Avenue  
Baldwin Park, California 91706

**4. Project location:**

1011 Baldwin Park Boulevard  
Baldwin Park, California 91706

**5. Project sponsor's name and address:**

Kaiser Foundation Hospitals  
1011 Baldwin Park Boulevard  
Baldwin Park, California 91706

**6. General plan designation:**

General Commercial (GC)

**7. Zoning:**

Freeway Commercial (FC)

**8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

As described above, the proposed project would include the expansion of the existing emergency department at the Kaiser Permanente Baldwin Park Medical Center and construction of a medical office building (MOB). For additional information please refer to Section 2, Project Description, of this MND.

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

The project site is bound by Dalewood Street to the north and northeast, Baldwin Park Boulevard to the southeast, Bess Avenue to the southwest, and Leorita Street to the northwest. The project is surrounded by existing development on all sides. The Interstate 10 freeway is located to the north on the other side of Dalewood Street. Southeast of the project site along Baldwin Park Avenue consists of general industrial uses and is currently a UPS Customer Center. Bess Avenue and Leorita Street to the southwest of the project site consists of single- and multifamily- residential land uses.

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

The project would require to have a plan check and a permit for the ED expansion with approval from the State Department of Health Care Access and Information (HCAI).

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

Yes. The Gabrieleno Band of Mission Indians- Kizh Nation has requested tribal consultation.

**Environmental Factors Potentially Affected**

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

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources          | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology and Soils             | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology and Water Quality   | <input type="checkbox"/> Land Use and Planning              | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                         | <input type="checkbox"/> Population and Housing             | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                    | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |

**Determination (To be completed by the Lead Agency)**

On the basis of this initial evaluation:

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



Signature

2/27/2023

Date

## Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significance

### 3.1 Aesthetics

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

**a) *Would the project have a substantial adverse effect on a scenic vista?***

A scenic vista generally consists of a defined viewpoint that provides wide ranging views of a landscape. The 2020 Baldwin Park General Plan does not identify or designate scenic vistas or viewsheds in the City of Baldwin Park. The project is located in an urbanized area and surrounded by existing development. As described above, the project is surrounded by residential land uses along Bess Avenue and Leorita Street, industrial land uses along Baldwin Park Blvd, and Interstate-10 on the other side of Dalewood Street. Additionally, the project site is an existing developed medical center. The proposed project would include an expansion of the existing emergency department and the construction of a MOB. The one-story emergency department expansion would expand the current department by approximately 23,000 square feet and the MOB would consist of a two-story high, 30,000 square foot building. Due to the lack of designated scenic vistas or viewsheds near the project site, the project would have no impact to scenic vistas.

**b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?***

As stated above, the project site is surrounded by existing development and is currently developed. The project site is adjacent to the I-10 Freeway to the north. In addition to being visible from I-10, the project site is briefly visible from I- 605. While the project site is visible from these freeways, neither of these

highways have been designated as a state scenic highway (Caltrans 2019). There are no rock outcroppings at or near the project site that would be impacted by project implementation.

Expansion of the emergency department and construction of the MOB would result in the removal of 37 trees on private property. Per Baldwin Park Municipal Code Section 153.165.090, the project would be required to obtain a tree removal permit for each tree that would be removed. Additionally, to maintain compliance with the Municipal Code, the project would replace the removed trees within six months of tree removal (City of Baldwin Park 2022a).

The construction of the MOB would require the demolition of an existing retail building that consists of two separate structures. One of these structures was constructed in 1976, requiring further investigation into the historical significance of the building because it had been more than 45 years since it was built. A Built Environment Inventory and Evaluation Report for the site was completed to evaluate the historical significance of the structures and is included as Appendix B, Built Environment Inventory and Evaluation Report. The Built Environment Inventory and Evaluation Report determined that while the structure was built over 45 years ago, the subject property is concluded to be ineligible as a designated resource in Baldwin Park, for the CRHR, and the NRHP due to a lack of significant historical associations and architectural merit. As the property is not considered a significant historic building and is not located within proximity to a state scenic highway, therefore the project would not impact views of historic buildings within a state scenic highway.

Based on the foregoing, the proposed project would not substantially damage scenic resources including, trees, rock outcroppings, and historic buildings within a state scenic highway. Impacts to these scenic resources would be less than significant.

- c) ***In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

The project site is located in an urbanized area surrounded by industrial, commercial, and residential land uses. The project site is currently developed with an existing medical center with associated MOBs and parking structures. Implementation of the project would include expansion of the existing emergency department at the northeastern portion of the site and the addition of a MOB on the northwestern corner of the site where an existing retail building exists.

The emergency department expansion and the MOB building would be generally consistent with the development standards for Commercial and Industrial Zones as set forth in Table 153.050.030 in the City of Baldwin Park Municipal Code and the general development standards in Municipal Code Section 153.130 (City of Baldwin Park, 2022b), except for the request for a variance in the front yard setback along Baldwin Park Boulevard. The variance would allow for an overhead projection from the building façade to encroach 2 feet, 10 inches within the required 10-foot front yard setback along Baldwin Park Blvd. The overhead project would consist of white painted metal panels that would be consistent with the projections on the second floor. Signage on the project site is currently regulated by the Kaiser Master Sign Program, because the signage regulations in the Baldwin Park Municipal Code does not currently address the needs for multi-building medical campuses. The proposed signage for the emergency department expansion would be similar to current signage at the project site that is outlined in the Master Sign Program.

The project would be consistent with the City of Baldwin Park General Plan policies that govern scenic quality. Policies include providing visual compatibility with the surrounding area and reducing lighting impacts on adjacent properties (Land Use Policy 2.5 and 2.6). As described below the project lighting would be shielded by existing buildings or be directed away from adjacent properties. Additionally, the project site currently consists of a medical campus and retail building, and the proposed project would include the expansion of an existing emergency department and a MOB.

The project would be consistent with zoning design standards and would not conflict with any other zoning regulations; therefore, this impact would be less than significant.

**d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

The City of Baldwin Park Municipal Code Section 153.140.040 regulates light and glare within the city. Specifically, the lighting standards under subsection (F) require that all lighting shall be directed or shielded away from adjacent properties, public right-of-way, and driveways areas that would obstruct motorist's vision. Existing conditions at the project site consist of a medical complex that currently produces light from streetlights, pathway lights, exterior building lighting and signage, parking lot lighting, and vehicular lighting from vehicles entering and exiting the site. Currently, the emergency department is illuminated from sunset to sunrise (typically from 6:00 p.m. to 6:00 a.m. depending on the time of year) and is consistent with the Municipal Code.

The emergency department expansion component would include the removal of existing lighting along the street frontage and within the parking lot. Light fixtures would then be reinstalled along the frontage of the emergency department expansion, the ambulance canopy, and the ambulance parking area. Lighting would be provided for signage, street, parking, building exteriors, and pathways on the project site. As described above, the Broken Horn Site is currently abandoned. The MOB component would introduce lighting for signage, street lighting, building exterior, pathways. Both the ED expansion and MOB would use exterior material that has low reflectivity. Despite the introduction of additional sources of light closer to public view, lighting would be shielded downward and away from the street reducing the impacts of the lighting to sensitive receptors.

Sensitive receptors to lighting in proximity to the project site include the residential uses to the southeast of the project site. New sources of lighting would be located in the northeast and northwest corner of the project site and light from the new MOB and emergency department would be shielded by existing parking structures and buildings currently on the medical campus.

Both the emergency department expansion and the MOB are located adjacent to a public right-of-way: Baldwin Park Boulevard (emergency department expansion), Leorita Street, (MOB), and Dalewood St (MOB). Additionally, just north of Dalewood Avenue is Interstate I-10. All lighting from the emergency department expansion would be shielded downward or towards the project away from Baldwin Park Boulevard. Additionally, all MOB lighting would be shielded away from Leorita Street, Dalewood St, and I-10 to comply with the Baldwin Park Municipal Code.

In conclusion, lighting for the proposed project would be shielded by existing buildings or be directed away from sensitive receptors, roadways, and adjacent properties. Lighting from the project would be consistent with the Baldwin Park Municipal Code. Project impacts from lighting and glare would be less than significant.

### 3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>II. AGRICULTURE AND FORESTRY RESOURCES</b> – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) ***Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

According to the Department of Conservation's Farmland Mapping and Monitoring Program, the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site is designated as "Urban and Built- Up Land" and completely surrounded by parcels designated "Urban and Built- Up Land" to the south and west as well as parcel's designated as "Urban and Built-Up Land". The project site is located in an urban area and there is no agricultural production in the vicinity of the project site (DOC 2016a). There would be no impact to Farmland, Unique Farmland, or Farmland of Statewide Importance or to surrounding agricultural production.

- b) ***Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

The project site is zoned as Freeway Commercial (FC) and is not zoned for agricultural uses. Additionally, the project does not contain a Williamson Act contract. No impact resulting from a conflict with existing zoning for agricultural use or a Williamson Act contract would occur.

- c) ***Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?***

The project site is zoned as a Freeway Commercial and is not designated as a forestry resource. No impact to forestry resources would occur.

- d) ***Would the project result in the loss of forest land or conversion of forest land to non-forest use?***

The project site has been previously developed and would not result in the loss or conversion of forest land to a non- forest use. No impact would occur.

- e) ***Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?***

The project site has been previously developed and it surrounded by development. The project site zoning is designated as Freeway Commercial, and implementation of the project would be consistent within the allowed uses in this zone. No agricultural or forestry uses are in the surrounding vicinity of the project site. No impact would occur.

### 3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY</b> – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to determine whether the project would have a significant impact on air quality.

The South Coast Air Quality Management District (SCAQMD) has established Air Quality Significance Thresholds, as revised in April 2019, that set forth quantitative emission significance thresholds below which a project would not have a significant impact on ambient air quality (SCAQMD 2019). The quantitative air quality analysis provided herein applies the SCAQMD thresholds identified in Table 3.3-1 to determine the potential for the project to result in a significant impact under CEQA.

**Table 3.3-1. SCAQMD Air Quality Significance Thresholds**

Criteria Pollutants Mass Daily Thresholds		
Pollutant	Construction (Pounds per Day)	Operation (Pounds per Day)
VOCs	75	55
NO <sub>x</sub>	100	55
CO	550	550
SO <sub>x</sub>	150	150
PM <sub>10</sub>	150	150
PM <sub>2.5</sub>	55	55
Lead <sup>a</sup>	3	3

**Table 3.3-1. SCAQMD Air Quality Significance Thresholds**

Criteria Pollutants Mass Daily Thresholds		
Pollutant	Construction (Pounds per Day)	Operation (Pounds per Day)
<b>TACs and Odor Thresholds</b>		
TACs <sup>b</sup>	Maximum incremental cancer risk $\geq 10$ in 1 million Cancer Burden $> 0.5$ excess cancer cases (in areas $\geq 1$ in 1 million) Chronic and acute hazard index $\geq 1.0$ (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
<b>Ambient Air Quality Standards for Criteria Pollutants<sup>c</sup></b>		
NO <sub>2</sub> 1-hour average NO <sub>2</sub> annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.030 ppm (state) and 0.0534 ppm (federal)	
CO 1-hour average CO 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
PM <sub>10</sub> 24-hour average PM <sub>10</sub> annual average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>d</sup> 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
PM <sub>2.5</sub> 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>d</sup> 2.5 $\mu\text{g}/\text{m}^3$ (operation)	

Source: SCAQMD 2019.

Notes: SCAQMD = South Coast Air Quality Management District; VOC = volatile organic compounds; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; TAC = toxic air contaminant; NO<sub>2</sub> = nitrogen dioxide; ppm = parts per million by volume;  $\mu\text{g}/\text{m}^3$  = micrograms per cubic meter.

greenhouse gas emissions thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not included in this table as they are addressed within the greenhouse gas emissions analysis and not the air quality analysis.

<sup>a</sup> The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

<sup>b</sup> TACs include carcinogens and noncarcinogens.

<sup>c</sup> Ambient air quality standards for criteria pollutants are based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.

<sup>d</sup> Ambient air quality threshold are based on SCAQMD Rule 403.

The phasing out of leaded gasoline started in 1976. As gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

The evaluation of whether the project would conflict with or obstruct implementation of the applicable air quality plan (CEQA Guidelines Appendix G Threshold III-1) is based on the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993), Chapter 12, Sections 12.2 and 12.3. The first criterion assesses if 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 the timely attainment of air quality standards of the interim emissions reductions specified in the Air Quality Management Plan (AQMP), which is addressed in detail under Section 3.3(b). The second criterion is if the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase, as discussed further in Section 3.3(a).

To evaluate the potential for the project to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (CEQA Guidelines Appendix G Threshold III-2), this analysis applies the SCAQMD's construction criteria pollutants mass daily thresholds, as shown in Table 3.3-1. Only those thresholds related to potentially significant construction impacts are applied herein because the project would not generate substantial criteria pollutant emissions or related impacts associated with operational activities. A project would potentially result in a cumulatively considerable net increase in ozone ( $O_3$ ), which is a nonattainment pollutant, if the project's construction emissions would exceed the SCAQMD volatile organic compound (VOC) or oxides of nitrogen ( $NO_x$ ) thresholds shown in Table 3.3-1. These emissions-based thresholds for  $O_3$  precursors are intended to serve as a surrogate for an  $O_3$  significance threshold (i.e., the potential for adverse  $O_3$  impacts to occur). This approach is used because  $O_3$  is not emitted directly, and the effects of an individual project's emissions of  $O_3$  precursors (VOC and  $NO_x$ ) on  $O_3$  levels in ambient air cannot be determined through air quality models or other quantitative methods.

The assessment of the project's potential to expose sensitive receptors to substantial pollutant concentrations (CEQA Guidelines Appendix G Threshold III-3) includes a localized significance threshold (LST) analysis, as recommended by the SCAQMD, to evaluate the potential of localized air quality impacts to sensitive receptors in the immediate vicinity of the project from construction and operation. For project sites of five acres or less, the SCAQMD LST methodology (SCAQMD 2008a) includes lookup tables that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance criteria (i.e., the emissions would not cause an exceedance of the applicable concentration limits for nitrogen dioxide [ $NO_2$ ], carbon monoxide [CO], particulate matter with a diameter less than or equal to 10 microns [ $PM_{10}$ ], and particulate matter with a diameter less than or equal to 2.5 microns [ $PM_{2.5}$ ]) without performing project-specific dispersion modeling.

The LST significance thresholds for  $NO_2$  and CO represent the allowable increase in concentrations above background levels in the vicinity of a project that would not cause or contribute to an exceedance of the relevant ambient air quality standards, while the threshold for  $PM_{10}$  represents compliance with Rule 403 (Fugitive Dust). The LST significance threshold for  $PM_{2.5}$  is intended to ensure that construction or operational emissions do not contribute substantially to existing exceedances of the  $PM_{2.5}$  ambient air quality standards. The allowable emission rates depend on the following parameters:

- a. Source-Receptor Area (SRA) in which the project is located
- b. Size of the project site
- c. Distance between the project site and the nearest sensitive receptor (e.g., residences, schools, hospitals)

The project would be within SRA 11 (South San Gabriel Valley). LST pollutant screening level concentration data is currently published for 1-, 2-, and 5-acre sites for varying distances (25, 50, 100, 200, and 500 meters). The project disturbs a total of approximately 1.29 acres. In accordance with the SCAQMD Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, the project would disturb a maximum of one acre per day during the site preparation phase (SCAQMD 2014). LSTs are more stringent for smaller areas (i.e., 1-acre LSTs are more stringent than 2-acre and 5-acre LSTs); therefore, the use of a 1-acre LST is conservative.

Sensitive receptors near the project site include residences located adjacent to the western and northern boundaries of the project site. These receptors are the closest receptors and thus capture a conservative scenario, as it is assumed that other receptors at further distances would be less exposed to potential impacts. As such, the closest LST available, 25 meters (82 feet), was applied. LST values for the project in SRA 11 and for 25 meters are presented in Table 3.3-2.

**Table 3.3-2. Localized Significance Thresholds for Source-Receptor Area 11 (South San Gabriel Valley)**

Pollutant	Thresholds (Pounds per Day)
	1-Acre Project Site, 25 Meters
NO <sub>2</sub>	83
CO	673
PM <sub>10</sub>	5
PM <sub>2.5</sub>	4

Source: SCAQMD 2008a.

Notes: SRA = Source-Receptor Area; NO<sub>2</sub> = nitrogen dioxide; CO = carbon monoxide; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; LST = localized significance threshold.

LSTs are shown for 1-acre project sites corresponding to a distance to a sensitive receptor of 25 meters.

The assessment of the project’s potential to expose sensitive receptors to substantial pollutant concentrations (CEQA Guidelines Appendix G Threshold III-3) also includes a construction health risk assessment (HRA) (see Appendix C, Air Quality, Greenhouse Gas Emissions, and Energy). A qualitative CO hotspot analysis is also included under Section 3.3(c), based on comparison to the SCAQMD 2003 AQMP CO hotspot analysis.

The potential for the project to result in other emissions, specifically an odor impact (State CEQA Guidelines Appendix G Threshold III-4), is based on the project’s land-use types and anticipated construction activity, and the potential for the project to create an odor nuisance pursuant to SCAQMD Rule 402.

**a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?***

As previously discussed, the project site is located within the South Coast Air Basin (SCAB) under the jurisdiction of the SCAQMD, which is the local agency responsible for administration and enforcement of air quality regulations for the area. The SCAQMD has established criteria for determining consistency with the AQMP, currently the 2016 AQMP, in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993). The criteria are as follows (SCAQMD 1993):

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

**Consistency Criterion No. 2:** The project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

**Consistency Criterion No. 1**

Section 3.3(b) evaluates the project’s potential impacts in regard to CEQA Guidelines Appendix G Threshold III-2 (the project’s potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation impact analysis). Emissions during construction and operation were less than the SCAQMD significance thresholds; as such, the project would not result in an increase in the frequency or severity of existing air quality violations. Therefore, the project would not conflict with Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook.

## Consistency Criterion No. 2

While striving to achieve the National Ambient Air Quality Standards (NAAQS) for O<sub>3</sub> and PM<sub>2.5</sub> and the California Ambient Air Quality Standards (CAAQS) for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> through a variety of air quality control measures, the 2016 AQMP also accommodates planned growth in the SCAB. Projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors (e.g., population, employment) is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook).

The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) (SCAG 2016, which is based on general plans for cities and counties in the SCAB, for the development of the AQMP emissions inventory (SCAQMD 2017a)).<sup>1</sup> The SCAG 2016 RTP/SCS and associated Regional Growth Forecast are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans. According to the Baldwin Park Land Use Map and Zoning Map, the General Plan land use designation for the project site is currently General Commercial (GC), while the project site is presently zoned Freeway Commercial (FC). As such, the project would be considered consistent with both the existing General Plan land use designation and zoning district. The project would not constitute a change in land use or zoning.

The project is estimated to create 105 new jobs. According to SCAG's 2020 Connect SoCal, the City of Baldwin Park is expected to have an employment population of 24,700 in 2016 and 26,500 in 2045, or 1,800 additional jobs in that timeframe (SCAG 2020). The project's additional 105 jobs would not exceed this forecasted growth in employment. As such, the project's designed employment would not exceed the annual growth projections for the City.

As the project would contribute to local employment growth and associated vehicle miles traveled (VMT) that are anticipated for the project site in the existing General Plan, the project is accounted for in the State Implementation Plan and the Regional Air Quality Strategy, and the project would be consistent with local air quality plans. Therefore, the impact would be less than significant.

## Summary

As described previously, the project would not result in an increase in the frequency and severity of existing air quality violations and would not conflict with Consistency Criterion No. 1. The project would be consistent with the General Plan and growth projections of the SCAG 2020 RTP/SCS. Thus, the project would not conflict with Consistency Criterion No. 2. Therefore, impacts related to the project's potential to conflict with or obstruct implementation of the applicable air quality plan would be less than significant.

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<sup>1</sup> Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including CARB, Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into their Travel Demand Model for estimating/projecting vehicle miles traveled (VMT) and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017a).

- b) ***Would the 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?***

### Construction

Emissions from the construction phase of the project were estimated using California Emissions Estimator Model (CalEEMod) Version 2020.4.0. Construction scenario assumptions, including phasing, equipment mix, and vehicle trips, were based on information provided by the project applicant and CalEEMod default values when project specifics were not known.

For purposes of estimating project emissions, and based on information provided by the project applicant, it is assumed that construction of the emergency department expansion would commence in May 2023<sup>2</sup> and would last approximately twenty-three months, ending in April 2025. It is assumed that construction of the medical office building would commence in June 2028 and last approximately eighteen months, ending in December 2029. The analysis contained herein is based on the following assumptions (duration of phases is approximate):

#### Emergency Department

- Demolition: two months
- Site preparation: one week
- Grading: two weeks
- Building construction: nineteen months
- Paving: four weeks
- Architectural coating: four weeks

#### Medical Office Building

- Site preparation: one week
- Grading: one week
- Building construction: sixteen months
- Paving: three weeks
- Architectural coating: three weeks

There is an estimated 24,790 square feet of existing structures to be demolished and hauled off site based on existing aerial images of the site. Assuming a haul truck capacity of 20 cubic yards per truck, earth-moving activities would result in approximately 64 round trips (114 one-way truck trips) during the demolition phase. CalEEMod default trip length values were used for the distances for all construction-related trips. Construction worker, vendor, and haul truck trips are based on CalEEMod default assumptions where project specific information was not available.

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<sup>2</sup> The analysis assumes a construction start date of May 2023, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

The construction equipment mix and vehicle trips used for estimating the project-generated construction emissions are shown in Table 3.3-3.

**Table 3.3-3. Construction Scenario Assumptions**

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
<b>Emergency Department</b>						
Demolition	10	0	114	Concrete/Industrial Saws	1	8
				Rubber Tired Dozers	1	8
				Tractors/Loaders/Backhoes	2	6
Site Preparation	6	0	0	Graders	1	8
				Tractors/Loaders/Backhoes	1	8
Grading	8	0	264	Graders	1	6
				Rubber Tired Dozers	1	6
				Tractors/Loaders/Backhoes	1	7
Building Construction	8	4	0	Cranes	1	4
				Forklifts	2	6
				Tractors/Loaders/Backhoes	2	8
Paving	18	0	0	Pavers	1	7
				Cement and Mortar Mixers	4	6
				Tractors/Loaders/Backhoes	1	7
				Rollers	1	7
Architectural Coating	2	0	0	Air Compressors	1	6
<b>Medical Office Building</b>						
Site Preparation	8	0	0	Graders	1	8
				Rubber Tired Dozers	1	7
				Tractors/Loaders/Backhoes	1	8
Grading	10	0	0	Graders	1	8
				Rubber Tired Dozers	1	8

**Table 3.3-3. Construction Scenario Assumptions**

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
				Tractors/Loaders/Backhoes	2	7
Building Construction	24	12	0	Cranes	1	6
				Forklifts	1	6
				Generator Sets	1	8
				Welders	3	8
				Tractors/Loaders/Backhoes	1	6
Paving	14	0	0	Pavers	1	6
				Cement and Mortar Mixers	1	6
				Paving Equipment	1	8
				Tractors/Loaders/Backhoes	1	8
				Rollers	1	7
Architectural Coating	6	0	0	Air Compressors	1	6

**Notes:** See Appendix C for details.

The project would implement dust control strategies as a project design feature. To reflect implementation of proposed dust control strategies in accordance with SCAQMD Rule 403, the following was assumed in CalEEMod:

- Water exposed area twice times per day (55% reduction in PM<sub>10</sub> and PM<sub>2.5</sub>).

The applicant has committed to heavy-duty diesel-powered construction equipment to be equipped with Tier 4 Interim or better diesel engines for engines 50 horsepower or greater. For engines less than 50 horsepower, the equipment shall be electrical or natural gas powered. Construction of the project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., off-road construction equipment, on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Therefore, such emission levels can only be approximately estimated with a corresponding uncertainty in precise ambient air quality impacts.

Criteria air pollutant emissions associated with temporary construction activity were quantified using CalEEMod. Construction emissions were calculated for the estimated worst-case day over the construction period associated with each phase and reported as the maximum daily emissions estimated during each year of construction (2023-2025 and 2028-2029). Construction schedule assumptions, including phase

type, duration, and sequencing, were based on information provided by the project applicant and are intended to represent a reasonable scenario based on the best information available. Default values provided in CalEEMod were used where detailed project information was not available.

Implementation of the project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The project would implement various dust control strategies and would be required to comply with SCAQMD Rule 403 to control dust emissions generated during the grading activities. Proposed construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites and unpaved roads two times per day depending on weather conditions. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOCs, NO<sub>x</sub>, CO, sulfur oxides (SO<sub>x</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>. The application of architectural coatings, such as exterior application/interior paint and other finishes, and application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1113 (Architectural Coatings).

Table 3.3-4 presents the estimated maximum daily construction emissions generated during construction of the project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix C.

**Table 3.3-4. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions**

Year	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
pounds per day						
2023	0.57	10.21	8.91	0.03	1.46	0.65
2024	0.31	4.70	8.22	0.01	0.17	0.08
2025	9.90	4.64	8.20	0.01	0.23	0.08
2028	0.39	6.38	13.26	0.02	3.13	1.58
2029	17.56	5.74	10.23	0.02	0.37	0.12
<b>Maximum Daily Emissions</b>	<b>17.56</b>	<b>10.21</b>	<b>13.26</b>	<b>0.03</b>	<b>3.13</b>	<b>1.58</b>
<i>SCAQMD Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

**Notes:** VOC = volatile organic compound; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; SCAQMD = South Coast Air Quality Management District. See Appendix C for complete results.

The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect CalEEMod "mitigated" output, which accounts for compliance with SCAQMD Rule 1113 (Architectural Coatings) and implementation of the project's fugitive dust control strategies, including watering of the project site and unpaved roads two times per day.

Maximum daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. As such, impacts would be less than significant.

The SCAB has been designated as a national nonattainment area for O<sub>3</sub> and PM<sub>2.5</sub> and a California nonattainment area for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction and operation of the project would generate VOC and NO<sub>x</sub> emissions (which are precursors to O<sub>3</sub>) and emissions of PM<sub>10</sub> and PM<sub>2.5</sub>. As indicated in Table 3.3-4, project-generated construction emissions would not exceed the SCAQMD emission-based significance thresholds.

By its nature, air pollution is largely a cumulative impact. However, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulative impact on air quality. If the emissions from the project would exceed the applied significance thresholds, it would have a cumulative contribution. Conversely, if the emissions from the project do not exceed the project-specific thresholds, it is generally not considered to result in a cumulatively significant impact (SCAQMD 2003a). Accordingly, to evaluate the potential for the project to result in a cumulative net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard, this analysis applies SCAQMD's criteria pollutants thresholds, as shown in Table 3.3-1. Additionally, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation if the project would exceed SCAQMD thresholds. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM<sub>10</sub> and PM<sub>2.5</sub> emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD. In addition, cumulative VOC emissions would be subject to SCAQMD Rule 1113 (Architectural Coatings).

Based on the project-generated construction emissions, the project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants. Impacts would be less than significant.

## Operation

Emissions from the operational phase of the project were estimated using CalEEMod Version 2020.4.0. Operational years of 2026 (Emergency Department) and 2030 (Medical Office Building) were assumed consistent with completion of project construction for each phase.

Following the completion of construction activities, the project would generate VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from mobile sources including vehicular traffic generated by patients, visitors, physicians/staff, and emergency vehicles (i.e., ambulance), area sources (space heating, water heating, landscaping), and stationary sources including diesel generators, hot water boilers, and steam boilers. Impacts would be less than significant.

## Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Emissions associated with natural gas usage in space heating and water heating are calculated in the building energy use module of CalEEMod, as described in the following text.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2017). Consumer product VOC emissions are estimated in CalEEMod based on the floor area of non-residential buildings and on the default factor of pounds of VOC per building square foot per day. The CalEEMod default values for consumer products were assumed.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers using during building maintenance. CalEEMod calculates the VOC evaporative emissions from application of surface coatings based on the VOC emission factor, the building square footage, the assumed fraction of surface area, and the reapplication rate. The VOC emission factor is based on the VOC content of the surface coatings, and SCAQMD's Rule 1113 (Architectural Coatings) governs the VOC content for interior and exterior coatings. The model default reapplication rate of 10% of area per year is assumed. Consistent with CalEEMod defaults, it is assumed that the surface area for painting equals 2.7 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating (CAPCOA 2017). Similar to construction, a VOC content of 50 g/L was assumed.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers. The emissions associated from landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per square foot of building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days. For the SCAB, the average annual number of summer days is estimated at 250 days (CAPCOA 2021).

## Energy Sources

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage (non-hearth). Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for GHGs in CalEEMod, since criteria pollutant emissions occur at the power plant, which is typically off site.

CalEEMod default values for energy consumption for the land uses were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end-use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the heating, ventilation, and air conditioning (HVAC) system, water heating system, and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous "plug-in" uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The current Title 24, Part 6 standards, referred to as the 2016 Title 24 Building Energy Efficiency Standards, became effective on January 1, 2017. The Title 24 2016 standards are assumed within the CalEEMod (CAPCOA 2017). The 2019 Title 24 Building Energy Efficiency Standards, which will be effective January 1, 2020, will further reduce energy used and associated emissions compared to current standards. Title 24, Part 6, does not apply to hospitals but does apply to other buildings such as the medical office building.

## Mobile Sources

The project would impact air quality through the vehicular traffic generated by the project. Emissions associated with project-generated daily traffic were modeled using the Institute of Transportation Engineers (ITE) land use code 610 (hospital) (number of beds) and land use code 720 (medical-dental office building) rates using the number of beds in the ED expansion and the number of employees for the MOB. CalEEMod was utilized to estimate daily emissions from proposed vehicular sources. CalEEMod default data, including temperature, trip characteristics, and variable start information, were conservatively used for the model inputs.

Table 3.3-5 presents the maximum daily area, energy, off-road equipment, and mobile source emissions associated with operation (years 2026 and 2030) of the project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix C.

**Table 3.3-5. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions - Unmitigated**

Emission Source	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
<b>Emergency Department</b>						
Area	0.50	0.00	0.00	0.00	0.00	0.00
Energy	0.04	0.38	0.32	0.00	0.03	0.03
Mobile	0.71	0.81	7.38	0.02	1.96	0.53
<i>Subtotal</i>	<i>1.25</i>	<i>1.20</i>	<i>7.71</i>	<i>0.02</i>	<i>1.99</i>	<i>0.56</i>
<b>Medical Office Building</b>						
Area	0.75	0.00	0.01	0.00	0.00	0.00
Energy	0.01	0.09	0.08	0.00	0.01	0.01
Mobile	2.30	2.24	20.84	0.05	5.78	1.56
<i>Subtotal</i>	<i>3.06</i>	<i>2.33</i>	<i>20.93</i>	<i>0.05</i>	<i>5.79</i>	<i>1.57</i>
<b>Total</b>	<b>4.31</b>	<b>3.53</b>	<b>28.64</b>	<b>0.07</b>	<b>7.78</b>	<b>2.13</b>
<i>SCAQMD Threshold</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

**Notes:** VOC = volatile organic compound; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; SCAQMD = South Coast Air Quality Management District; PDF = project design feature.

See Appendix C for complete results.

Totals may not sum due to rounding.

The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect CalEEMod “mitigated” output and operational years of 2026 and 2030, which accounts for compliance with SCAQMD Rule 1113 (Architectural Coatings).

As shown in Table 3.3-5, the combined daily area, energy, off-road, and mobile source emissions would not exceed the SCAQMD operational thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Therefore, the project would result in a less-than-significant impact during operation.

c) **Would the project expose sensitive receptors to substantial pollutant concentrations?**

**Localized Significance Thresholds Analysis**

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). Sensitive receptors near the project site include residences adjacent to the project site on the northern and eastern boundaries.

An LST analysis has been prepared to determine potential impacts to nearby sensitive receptors during construction of the project. As indicated in the discussion of the thresholds of significance, the SCAQMD also recommends the evaluation of localized NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> impacts as a result of construction activities to sensitive receptors in the immediate vicinity of the project site. The impacts were analyzed using methods consistent with those in the SCAQMD’s Final Localized Significance Threshold Methodology (2008). According to the Final Localized Significance Threshold Methodology, “off-site mobile emissions from the project should not be included in the emissions compared to the LSTs” (SCAQMD 2008a). Hauling of soils and construction materials associated with project construction are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways. Localized emissions from the trucks would be relatively brief in nature and would cease once the trucks pass through the main streets.

Construction activities associated with the project would result in temporary sources of on-site and off-site fugitive dust and construction equipment emissions. Operational emissions include use of off-road equipment and mobile sources on site. The maximum allowable daily emissions that would satisfy the SCAQMD localized significance criteria for SRA 11 are presented in Table 3.3-6 and compared to the maximum daily on-site construction emissions generated during the project.

**Table 3.3-6. Localized Significance Thresholds Analysis for Project - Unmitigated**

Maximum On-Site Emissions	NO <sub>2</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
	Pounds per Day			
Construction Emissions	6.70	13.07	2.98	1.38
SCAQMD LST	83	673	5	4
<b>LST Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: SCAQMD 2008a.

Notes: NO<sub>2</sub> = nitrogen dioxide; CO = carbon monoxide; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.

See Appendix C for complete results.

LSTs are shown for a 1-acre project sites corresponding to a distance to a sensitive receptor of 25 meters.

These estimates implementation of the project’s fugitive dust control strategies, including watering of the project site and unpaved roads two times per day.

As shown in Table 3.3-6, construction activities would not generate emissions in excess of site-specific LSTs; therefore, localized impacts during construction of the project would be **less than significant**. Operational activities would not generate emissions in excess of site-specific LSTs.

## Health Impacts of Carbon Monoxide

Mobile source impacts occur on two scales of motion. Regionally, project-related travel would add to regional trip generation and increase the VMT within the local airshed and the SCAB. Locally, traffic generated by the project would be added to the City's roadway system near the project site. If such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles cold-started and operating at pollution-inefficient speeds, and is operating on roadways already crowded with non-project traffic, there is a potential for the formation of microscale CO hotspots in the area immediately around points of congested traffic. Because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing.

At the time that the SCAQMD 1993 Handbook was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP (Appendix V, Modeling and Attainment Demonstrations, in SCAQMD 2003b) for the four worst-case intersections in the SCAB: (1) Wilshire Boulevard and Veteran Avenue, (2) Sunset Boulevard and Highland Avenue, (3) La Cienega Boulevard and Century Boulevard, and (4) Long Beach Boulevard and Imperial Highway. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. Using CO emission factors for 2002, the peak modeled CO 1-hour concentration was estimated to be 4.6 parts per million (ppm) at the intersection of Wilshire Boulevard and Veteran Avenue. When added to the maximum 1-hour CO concentration from 2018 through 2020 at the Azusa monitoring station, which was 2.4 ppm in 2020, the 1-hour CO would be 6.8 ppm, while the CAAQS is 20 ppm.

The 2003 AQMP also projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO concentration was 3.8 ppm at the Sunset Boulevard and Highland Avenue intersection in 2002; the maximum 8-hour CO concentration was 3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002. Adding the 3.8 ppm to the maximum 8-hour CO concentration from 2018 through 2020 at the Azusa monitoring station, which was 2 ppm in 2020, the 8-hour CO would be 5.8 ppm, while the CAAQS is 9.0 ppm.

Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. Because the project would not increase daily traffic volumes at any study intersection to more than 100,000 vehicles per day (Appendix C),<sup>3</sup> a CO hotspot is not anticipated to occur and associated impacts would be less than significant.

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<sup>3</sup> For each study intersection in each scenario evaluated in the TIA, the daily volumes were estimated by assuming that the AM peak hour intersection volumes represent 8% of the daily traffic volumes and the total PM peak hour intersection volumes represent 10% of the daily traffic volumes. Using this method, all 28 study intersections were estimated to result in less than 100,000 vehicles per day in every scenario evaluated (ranging from 8,060 vehicles to 84,663 vehicles).

## Health Impacts of Toxic Air Contaminants

### Construction Health Risk

A construction HRA was performed to evaluate potential health risk associated with construction of the project. The following discussion summarizes the dispersion modeling and HRA methodology; supporting construction HRA documentation, including detailed assumptions, is presented in Appendix C.

For risk assessment purposes, PM<sub>10</sub> in diesel exhaust is considered DPM, originating mainly from off-road equipment operating at a defined location for a given length of time at a given distance from sensitive receptors. Less-intensive, more-dispersed emissions result from on-road vehicle exhaust (e.g., heavy-duty diesel trucks). For the construction HRA, the CalEEMod scenario for the project was adjusted to reduce diesel truck one-way trip distances to 1,000 feet to estimate emissions from trucks on site.

The air dispersion modeling methodology was based on generally accepted modeling practices of SCAQMD (SCAQMD 2022). Air dispersion modeling was performed using the EPA’s American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) Version 21112 modeling system (computer software) with the Lakes Environmental Software implementation/user interface, AERMOD View Version 10.2.1. The HRA followed the Office of Environmental Health Hazard Assessment (OEHHA) 2015 guidelines (OEHHA 2015) and SCAQMD guidance to calculate the health risk impacts at all proximate receptors as further discussed below. The dispersion modeling included the use of standard regulatory default options. AERMOD parameters were selected consistent with the SCAQMD and EPA guidance and identified as representative of the project site and project activities. Principal parameters of this modeling are presented in Table 3.3-7.

**Table 3.3-7. American Meteorological Society/Environmental Protection Agency Regulatory Model Principal Parameters**

Parameter	Details
Meteorological Data	AERMOD-specific meteorological data for the Azusa air monitoring station (AZUS) was used for the dispersion modeling. A 5-year meteorological data set from 2012 through 2016 was obtained from the SCAQMD in a preprocessed format suitable for use in AERMOD.
Urban versus Rural Option	Urban dispersion option was selected due to the developed nature of the project area and per SCAQMD guidelines. Los Angeles County’s population of 9,818,605 was used in the analysis (SCAQMD 2022).
Terrain Characteristics	The elevation of the site is 311 feet above sea level and the surrounding area is predominantly flat.
Elevation Data	Digital elevation data were imported into AERMOD and elevations were assigned to receptors and emission sources, as necessary. Digital elevation data were obtained through the AERMOD View in the United States Geological Survey’s National Elevation Dataset format with a resolution of 1 degree (approximately 30 meters), consistent with the SCAQMD guidance (SCAQMD 2022).
Source Release Characterizations	Construction was modeled as a series of line-volume sources where the emergency department and medical office buildings will be constructed. A plume height dimension of 6.8 meters, a plume width dimension of 8.6 meters, and a release height of 3.4 meters was assumed for off-road equipment and diesel trucks, consistent with the EPA guidance (EPA 2021).

**Notes:** AERMOD = American Meteorological Society/Environmental Protection Agency Regulatory Model; SCAQMD = South Coast Air Quality Management District. See Appendix C.

Regarding receptors, the construction scenario placed two Cartesian receptor grids with 20-meter spacing over proximate residential areas to establish the impact area and evaluate locations of maximum health risk impact.

The health risk calculations were performed using the Hotspots Analysis and Reporting Program Version 2 (HARP2) Air Dispersion and Risk Tool (ADMRT, dated 22118). AERMOD was run with all sources emitting unit emissions (1 gram per second) to obtain the necessary input values for HARP2. The line of volume sources was partitioned evenly based on the 1 gram per second emission rate. The ground-level concentration plot files were then used to estimate the long-term cancer health risk to an individual, and the noncancerous chronic health indices. There is no reference exposure level for acute health impacts from DPM; thus, acute risk was not evaluated.

Cancer risk is defined as the increase in probability (chance) of an individual developing cancer due to exposure to a carcinogenic compound, typically expressed as the increased chances in one million. Maximum Individual Cancer Risk is the estimated probability of a maximally exposed individual potentially contracting cancer as a result of exposure to toxic air contaminants (TACs) over a period of 30 years for residential receptor locations. In accordance with SCAQMD guidance, the RMP Derived Method was evaluated for residential cancer risk. For the construction HRA, the TAC exposure period was assumed to be from third trimester of pregnancy for 24 months for all receptor locations (i.e., the assumed duration of project construction) for the emergency department and 19 months for the medical office building. The HRA was run assuming exposure period would start in the third trimester for both phases of construction. The risk of each phase was then summed. The exposure pathway for DPM is inhalation only.

The SCAQMD has also established noncarcinogenic risk parameters for use in HRAs since some TACs increase noncancerous health risk due to long-term (chronic) exposures and some TACs increase noncancerous health risk due to short-term (acute) exposures. Chronic exposure is evaluated in the construction HRA. Noncarcinogenic risks are quantified by calculating a hazard index, expressed as the ratio between the ambient pollutant concentration and its toxicity or reference exposure level, which is a concentration at or below which health effects are not likely to occur. The chronic hazard index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. A hazard index less of than 1.0 means that adverse health effects are not expected. Results of the construction HRA are presented in Table 3.3-8.

**Table 3.3-8. Construction Health Risk Assessment Results**

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	4.3	10	Less than Significant
Chronic Hazard Index – Residential	Index Value	0.003	1.0	Less than Significant

Source: SCAQMD 2019.

Notes: CEQA = California Environmental Quality Act. See Appendix C.

As shown in Table 3.3-8, project construction activities would result in a Residential Maximum Individual Cancer Risk of 4.3 in 1 million, which is less than the significance threshold of 10 in 1 million. Project construction would

result in a Residential Chronic Hazard Index of 0.003, which is below the 1.0 significance threshold. The project construction TAC health risk impacts would be less than significant.

### Operational Health Risk

In regard to operations, the proposed project does not include potential sources of substantial TACs, such as large boilers or emergency generators. As such, the proposed project would not result in a substantial increase in TAC generation from on-site sources during long-term operations and would not result in significant health risk at nearby sensitive receptors.

### Health Effects of Other Criteria Air Pollutants

Project construction would not exceed SCAQMD thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>.

VOCs and NO<sub>x</sub> are precursors to O<sub>3</sub>, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O<sub>3</sub> are generally associated with reduced lung function. The contribution of VOCs and NO<sub>x</sub> to regional ambient O<sub>3</sub> concentrations is the result of complex photochemistry. The increases in O<sub>3</sub> concentrations in the SCAB due to O<sub>3</sub> precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O<sub>3</sub> concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O<sub>3</sub> CAAQS/NAAQS tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O<sub>3</sub> precursors is speculative due to the lack of quantitative methods to assess this impact. Because construction and operation of the project would not exceed SCAQMD thresholds for NO<sub>x</sub> or VOC, implementation of the project would minimally contribute to regional O<sub>3</sub> concentrations and the associated health effects.

Construction and operation of the project would not contribute to exceedances of the NAAQS and CAAQS for NO<sub>2</sub>. Health effects that result from NO<sub>2</sub> and NO<sub>x</sub> include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. Project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the site and would not be concentrated in one portion of the site at any one time. In addition, existing NO<sub>2</sub> concentrations in the area are well below the NAAQS and CAAQS standards. Operation of the project would not create substantial, localized NO<sub>x</sub> impacts.

CO tends to be a localized impact associated with congested intersections. The associated potential for CO hotspots were discussed previously and are determined to be a less-than-significant impact. Thus, the project's CO emissions would not contribute to significant health effects associated with this pollutant.

Construction and operation of the project would also not exceed thresholds for PM<sub>10</sub> or PM<sub>2.5</sub> and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter or obstruct the SCAB from coming into attainment for these pollutants. Additionally, the project would implement dust control strategies and be required to comply with SCAQMD Rule 403, which limits the amount of fugitive dust generated during construction. Due to the minimal contribution of particulate matter during construction and operation, the project is not anticipated to result in health effects associated with PM<sub>10</sub> or PM<sub>2.5</sub>, and thus the impact would be less than significant.

**d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The project would not include land uses that generate odors as discussed above during operation. Therefore, project operations would result in an odor impact that is less than significant.

### 3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES – Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

The project site is completely developed with a medical campus, which includes an emergency department, medical office buildings, surface and structured parking and landscaping. Due to the developed nature of the project site, the project does not contain habitat that would support sensitive species. No known candidate, sensitive, or special status wildlife are located on the project site.

The study area contains trees that would potentially be used by migratory birds for breeding. Direct impacts to migratory nesting birds must be avoided to comply with the Migratory Bird Treaty Act (16 USC 703–712) and California Fish and Game Code. Indirect impacts to nesting birds from short-term, construction-related noise could result in decreased reproductive success or abandonment of an area as nesting habitat if construction were conducted during the breeding/nesting season (i.e., January through August). If construction were conducted during the breeding/nesting season, the project would comply with Migratory Bird Treaty Act and California Fish and Game Code requirements, which would include measures such as nesting bird surveys prior to construction. Overall, a less than significant impact to candidate, sensitive, or special status species would occur as a result of project implementation.

**b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

As stated above, the project site is completely developed and does not contain any natural vegetation communities or riparian habitat. Additionally, the project site is surrounded by existing development and is not in proximity to any sensitive natural communities. No impact to sensitive natural communities would occur as a result of project implementation.

- c) ***Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

As stated above, the project site is completely developed and does not contain any natural vegetation communities. Additionally, the project site does not contain any hydrologic features or federally protected wetlands. Therefore, no impact would occur through direct removal, filling, hydrological interruption of wetlands as a result of project implementation.

- d) ***Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

As discussed above, the project site is completely developed and does not contain any natural vegetation communities or habitat. Additionally, the project site is surrounded by existing development that do not contain any wildlife corridors or habitat linkages. Therefore, implementation of the project would have no impact to habitat linkages or corridors.

- e) ***Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

The City of Baldwin Park Municipal Code Section 153.165, Tree Preservation and Protection, governs the preservation and removal of trees within the City (City of Baldwin Park 2022a). The project is expected to remove 37 trees during Phase I and no trees would be removed as part of Phase II. None of the trees that are expected to be removed are located within the public right-of-way. To comply with Baldwin Park Municipal Code Section 153.165, the project would be required to obtain a tree removal permit before the removal of any trees. A tree removal permit would only be granted if a suitable replacement would be planted within six months of the permitted removal. The project would plant trees at a 1:1 ratio to be consistent with the Baldwin Park Municipal Code Tree Preservation and Protection Ordinance; in light of the 1:1 replacement of lost trees, this impact would be less than significant.

- f) ***Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

As discussed above, the project site is developed consisting of a medical campus and retail building. The project site is also surrounded by existing development and is not located with a Habitat Conservation Plan or Natural Community Conservation Plan. Additionally, due to the project site being developed, the project would does not contain any native vegetation communities or habitat. No impact to an HCP or NCCP would occur.

### 3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES – Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?***

The project site contains an existing medical campus and an abandoned retail building known as the “Broken Horn” site. The project proposes to redevelop the Broken Horn site to include a MOB and would demolish the existing buildings on site. The Broken Horn site consists of two attached buildings: 1026 Leorita Street, constructed in 1976, and 1022-1024 Leorita Street, which was constructed in 1986. The buildings appear to have been connected circa 1995, per aerial photographs (NETR 2022). The subject property housed the same business, the Broken Horn Saddlery, from 1976 until 2021 when the business vacated the subject property and moved to a new location. The subject property is currently vacant. Although 1022-1024 Leorita Street is not over 45-years in age, the buildings were evaluated as a single property due to their shared history and physical connection.

As determined in Appendix B, the Broken Horn property appears ineligible as a historical resource at the local, state, and federal level. No historical resources were identified within the Project site as a result of extensive archival research, a SCCIC records search, field survey, and property evaluations of significance. The subject property is not currently designated or listed under any national, state, or local landmark programs. The subject property has further not been identified as eligible for local designation by any historical resource surveys.

The Broken Horn property was evaluated in accordance with Section 15064.5 (a)(2)-(3) of California Environmental Quality Act (CEQA) Guidelines and using the criteria outlined in Section 5024.1 of the California Public Resources Code and the building does not appear to be eligible for listing in the NRHP, CRHR, or for historical designation in the City of Baldwin Park due to a lack of significance. As such, the subject property does not appear to be a historical resource under CEQA. Therefore, no impact to historical resources would occur.

**b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?***

The project site is currently developed, consisting of an active medical campus and associated parking structure, abandoned retail buildings and parking lots, and landscaped areas. As described in Appendix B, the cultural resource assessment included a California Historical Resources Information System (CHRIS) records search conducted at the South Central Coastal Information Center (SCCIC); Native American coordination with the Native American Heritage Commission (NAHC) for a Sacred Lands File (SLF) search; an in-depth review of geotechnical, archival, academic, and ethnographic information; and an archaeological pedestrian survey.

A search of the CHRIS database for the project site and 1-mile records search area did not identify any previously recorded historic-period or prehistoric archeological resources. Additionally, of the 13 previous technical studies that were conducted within 1 mile of the project site, three studies address portions of the project site; however, approximately 70% of the project site has not been subjected to any previous archaeological investigations or surveys. None of the previous studies identified archaeological resources within the project site. Additionally, review of aerial photographs showed the San Gabriel River Wash to the west of the project site was not channelized and Walnut Creek intersected the project site up until 1964, which suggests that the project site has likely been modified by the natural movement of soils in prehistoric and historic periods indicating that if cultural material does exist within the project site, it would likely have been buried, displaced (not exist within its original context), or destroyed along the historical route of Walnut Creek. A pedestrian survey for the project (conducted August 24, 2022) did not identify any surficial evidence of cultural material.

A review of a 2022 and 2015 geotechnical report and available boring logs documenting the results of subsurface exploratory investigations conducted in 1986, 1989, 1990, 2015, and 2021 for portions of the project site determined that fill soils were encountered at a variety of depths across the project site and generally extended from surface to between seven inches and 12 feet below ground surface. Current project design indicates that the maximum depth of ground disturbance for the MOB component at the Broken Horn site is 10 feet below the existing ground surface and a maximum depth of 65 feet below current grade for the drilling of caissons at the emergency department expansion component. In addition, ground disturbance associated with all other construction components, including site preparation, vegetation removal, and trenching for utility work is assumed to be no deeper than five feet below existing ground surface across the project site.

In consideration of all these factors, the potential to encounter unknown intact archaeological resources between current grade and to depths of identified fill soils is relatively unlikely. However, the potential for intact cultural deposits to exist within soils underlying fills soils to proposed depths of disturbance is unknown considering the lack of opportunity to observe native soils during the pedestrian survey and that no previous archaeological investigation has occurred prior to placement of fill soils for approximately 70% of the project site. As such, there is potential for archaeological resources within the project site to be present within the native soils that exist beneath fill soils. Since proposed depths of disturbance may extend deeper than documented fill soils, native soils with the potential for archaeological deposits to exist will be disturbed. In the event that unknown archaeological resources are encountered during project implementation, impacts to these resources are potentially significant and mitigation is required.

Mitigation Measure **MM-CUL-1** through **MM-CUL-3** would ensure that measurements are in place for the proper treatment of any inadvertently discovered archaeological resources and potential impacts to archaeological resources and human remains would be reduced to less than significant with mitigation incorporated.

**MM-CUL-1** **Workers Environmental Awareness Program Training.** All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the Workers Environmental Awareness Program (WEAP) training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources, tribal cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.

**MM-CUL-2** **Retention of a Qualified Archaeologist.** A qualified archaeologist shall be retained and on-call to respond and address any inadvertent discoveries identified for the duration of construction activities. Additionally, in consideration of the potential to encounter intact cultural deposits beneath fill soils, the qualified archaeologist shall survey the proposed Project site once fill soils have been removed to ensure no cultural deposits underly the fill layer. If it is determined, based on the survey after the removal of fill soils, that cultural resources are present or may be present that may be impacted during project construction, monitoring shall be warranted. If it is determined that monitoring is warranted, a qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The archaeological monitor will be responsible for maintaining daily monitoring logs.

**MM-CUL-3** **Inadvertent Discovery Treatment and Protocol.** In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed Project, all construction work occurring within 50 feet of the find should immediately stop and a qualified archaeologist should be notified immediately to assess the significance of the find and determine whether or not additional study is warranted. If human remains or suspected human remains are discovered, all construction work occurring within 50 feet of the find should immediately stop. The archaeologist will provide recommendations regarding next steps based on inspection and initial assessment of the significance of the find. The preferred management strategy for cultural resources shall be preservation in place through avoidance or other methods. If the discovery proves significant under CEQA, and preservation in place infeasible, additional work such as preparation of an archaeological treatment plan, testing, data recovery, or monitoring shall be engaged to document or preserve the find.

Within 60 days following completion of ground disturbance, an archaeological monitoring report shall be prepared and submitted to the City for review. This report should document

compliance with approved mitigation, document the monitoring efforts, and include an appendix with daily monitoring logs. The final report shall be submitted to the SCCIC.

**c) *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?***

The cultural resources intensive pedestrian survey conducted for the project did not identify any human remains or find any indications that they would be expected to be found on the project site. However, although unlikely, there is the possibility of human remains being discovered during ground disturbing activities on the project site. If remains are discovered during project construction activities, mitigation is proposed that would require work in the vicinity of the discovery be halted and procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) be followed. Therefore, potential discovery of undocumented human remains on the project site could result in a potentially significant impact and mitigation is required.

Mitigation Measure **MM-CUL-4** would ensure that measurements are in place for the proper treatment of any inadvertently discovered human remains and potential impacts to human remains would be reduced to less than significant with mitigation incorporated.

**MM-CUL-4** Human Remains: As specified by California Health and Safety Code Section 7050.5, if human remains, or remains that are potentially human, are found on the project site during ground disturbing activities or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the Los Angeles County Medical Examiner's Office by telephone. No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains (as determined by the Qualified Archaeologist and/or the TCA Native American monitor) shall occur until the Medical Examiner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98.

If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected (as determined by the Qualified Archaeologist and/or the TCA Native American monitor), and consultation and treatment could occur as prescribed by law. As further defined by State law, the Medical Examiner will determine within two working days of being notified if the remains are subject to his or her authority. If the Medical Examiner recognizes the remains to be Native American, and not under his or her jurisdiction, then he or she shall contact the Native American Heritage Commission by telephone within 24 hours. The Native American Heritage Commission will make a determination as to the Most Likely Descendent, who shall be afforded 48 hours from the time access is granted to the discovery site to make recommendations regarding culturally appropriate treatment.

If suspected Native American remains are discovered, the remains shall be kept in situ (in place) until after the Medical Examiner makes its determination and notifications, and until after the Most Likely Descendent is identified, at which time the archaeological examination of the remains shall only occur on site in the presence of the Most Likely Descendent. The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. According to California Health and

Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). In the event that the Applicant/Owner and the Most Likely Descendant are in disagreement regarding the disposition of the remains, State law will apply, and the mediation process will occur with the NAHC. In the event that mediation is not successful, the landowner shall rebury the remains at a location free from future disturbance (see Public Resources Code Section 5097.98[e] and 5097.94[k]).

### 3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. Energy</b> – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

The electricity and natural gas used for construction of the project would be temporary and would be substantially less than that required for project operation and would have a negligible contribution to the project’s overall energy consumption. Although the project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in VMT over time.

#### Short-Term Construction

CalEEMod Version 2020.4.0 was used to estimate potential project-generated GHG emissions during construction, which were then used to estimate energy consumption. Construction of the project would result in GHG emissions primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. All details for construction criteria air pollutants discussed in Section 3.3, Air Quality, and Appendix C of this Draft MND are also applicable for the estimation of construction-related GHG emissions. The estimated GHGs were back-calculated based on carbon content (i.e., kilograms of carbon dioxide [CO<sub>2</sub>] per gallon) in order to estimate fuel usage during project construction. The conversion factor for gasoline is 8.78 kilograms per metric ton CO<sub>2</sub> per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO<sub>2</sub> per gallon (The Climate Registry 2021). Energy use calculations for construction are provided in Appendix C.

### Electricity

Temporary electric power for as-necessary lighting and electronic equipment such as computers inside temporary construction trailers would be provided by Southern California Edison (SCE). The electricity used for such activities would be temporary and would be substantially less than that required for project operation and would have a negligible contribution to the project’s overall energy consumption.

### Natural Gas

Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the “petroleum” subsection. Any minor amounts of natural gas that may be consumed as a result of project construction would be substantially less than that required for project operation and would have a negligible contribution to the project’s overall energy consumption.

### Petroleum

Heavy-duty construction equipment associated with demolition and construction activities for construction would rely on diesel fuel, as would haul trucks involved in removing the materials from demolition and excavation. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed in this analysis that construction workers would travel to and from the site in gasoline-powered passenger vehicles.

Heavy-duty construction equipment of various types would be used during each phase of project construction. Appendix C lists the assumed equipment usage for each phase of construction.

Fuel consumption from construction equipment was estimated by converting the total CO<sub>2</sub> emissions from each construction phase to gallons using the conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. Construction is estimated to occur in the years 2023-2025 and 2028-2029 based on the construction phasing schedule. The conversion factor for gasoline is 8.78 kilograms per metric ton CO<sub>2</sub> per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO<sub>2</sub> per gallon (The Climate Registry 2021). The estimated diesel fuel usage from construction equipment, haul trucks, and vendor trucks, as well as estimated gasoline fuel usage from worker vehicles, is shown in Table 3.6-1. The movement of soils on site would be accomplished with off-road equipment.

**Table 3.6-1. Total Project Construction Petroleum Demand**

Off-Road Equipment (diesel)	Haul Trucks (diesel)	Vendor Trucks (diesel)	Worker Vehicles (gasoline)
<b>Gallons</b>			
48,036.76	1,109.93	4,924.78	5,722.51

Source: See Appendix C for outputs.

In summary, construction associated with the potential future development facilitated by the Project over the construction period is conservatively anticipated to consume 5,722.51 gallons of gasoline from worker vehicles and 54,071.47 gallons of diesel from off-road equipment, haul trucks, and vendor trucks. In Los

Angeles County in 2023, it is estimated that approximately 4.2 billion gallons of petroleum would be consumed by on-road vehicles, and approximately 43 million gallons of petroleum would be consumed by off-road equipment (CARB 2021).

The Project would be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements. Overall, the Project would not be unusual when compared to overall local and regional demand for energy resources and would not involve characteristics that require equipment that would be less energy-efficient than at comparable construction sites in the region or state.

Additionally, any future development facilitated by the Project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the latest Title 24 standards. Considering these requirements, the Project would not result in the inefficient, wasteful, or unnecessary consumption of construction energy. Therefore, short-term construction energy impacts would be less than significant.

### Long-Term Operational Impacts

During project operations, activities that would consume energy would include electricity and natural gas use for building operations, electricity for water and wastewater conveyance, and petroleum consumption from employees, customers, and delivery vehicle trips. Additional assumptions for these sources are described below and energy use calculations for operations are provided in Appendix C.

#### Electricity

The operation of the project buildout would require electricity for multiple purposes, including cooling, lighting, appliances, and various equipment. Additionally, the supply, conveyance, treatment, and distribution of water would indirectly result in electricity usage. Electricity consumption associated with project operation is based on the CalEEMod outputs presented in Appendix C.

CalEEMod default values for energy consumption for each land use were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the HVAC system, water heating system, and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous "plug-in" uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2019 standards, became effective on January 1, 2020. According to these estimations, the project would consume approximately 908,573 kilowatt-hours (kWh) per year during operation (Appendix C). The project would consume

approximately 105,019.11 kWh per year from water and wastewater sources, resulting in a total use of 1,013,592.11 kWh per year. The non-residential electricity demand in 2020 was 42,736,774,915 kWh (42,737 gigawatt-hours) for Los Angeles County (CEC 2020). As such, the project would have a negligible impact on demand for Los Angeles County and SCE.

### Natural Gas

The operation would require natural gas for various purposes, including water heating and natural gas appliances and forklifts. Natural gas consumption associated with operation is based on the CalEEMod outputs in Appendix C.

CalEEMod default values for energy consumption for each land use were applied for the project analysis. According to these estimations, the project would consume approximately 1,771,660 kilo-British thermal units per year. The non-residential natural gas consumption in 2020 was 1,698,687,468 kilo-British thermal units for Los Angeles County (CEC 2020).

### Petroleum

During operations, the majority of fuel consumption resulting from the project would involve the use of motor vehicles traveling to and from the project site, off-road equipment (yard trucks), and emergency generator testing.

Petroleum fuel consumption associated with motor vehicles traveling to and from the project site is a function of the VMT as a result of project operation. As shown in Appendix C and as discussed in Section 3.3, Air Quality, and Section 3.8, Greenhouse Gas Emissions, the annual net new VMT attributable to the project is expected to be 3,566,844 VMT. Similar to the construction worker and vendor trips, fuel consumption from worker and truck trips is estimated by converting the total CO<sub>2</sub> emissions from operation of the project to gallons using the conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. Mobile source emissions were estimated using the CalEEMod.

Calculations for annual mobile source fuel consumption are provided in Table 3.6-2.

**Table 3.6-2. Annual Mobile Source Petroleum Demand**

Fuel	Vehicle MT CO <sub>2</sub>	kg/CO <sub>2</sub> /Gallon	Gallons
Gasoline	819.61	8.78	93,350.20
Diesel	200.20	10.21	19,608.26
<b>Total</b>			<b>112,958.46</b>

**Sources:** Trips and vehicle CO<sub>2</sub> (Appendix C); kg/CO<sub>2</sub>/Gallon (The Climate Registry 2021).

**Notes:** MT = metric ton; CO<sub>2</sub> = carbon dioxide; kg = kilogram.

By comparison, California as a whole consumes approximately 28.6 billion gallons of petroleum per year (EIA 2017). Countywide total petroleum use by vehicles is expected to be 4.0 billion gallons per year by 2026 (CARB 2021).

## Summary

Statewide emission reduction measures proposed in the CARB-adopted amendments to the Pavley regulations include measures aimed at reducing GHG emissions associated with transportation. These amendments are part of California's commitment to a nationwide program to reduce new passenger vehicle GHGs from 2012 through 2016. Pavley regulations reduced GHG emissions from California passenger vehicles by about 22% in 2012 and by about 30% in 2016, all the while improving fuel efficiency and reducing motorists' costs. As such, vehicle trips associated with the project are expected to use less petroleum due to advances in fuel economy over time.

CARB has adopted a new approach to passenger vehicles—cars and light trucks—by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California (CARB 2017).

The project would create additional electricity and natural gas demand by adding recreational and commercial facilities. New facilities associated with the project would be subject to the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of nonresidential buildings and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting.

In summary, although natural gas and electricity usage would increase due to the implementation of the project, the project's energy efficiency would go beyond code compliance. Although the project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in VMT over time. Therefore, impacts to energy resources during operation would be less than significant.

**b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

The project would be subject to and would comply with, at a minimum, the 2019 California Building Code Title 24 (24 CCR Part 6). The project would not conflict with existing energy standards and regulations. The electricity and natural gas used for construction of the project would be temporary and would be substantially less than that required for project operation and would have a negligible contribution to the project's overall energy consumption.

## Construction

The electricity and natural gas used for construction of the project would be temporary and would be substantially less than that required for project operation and would have a negligible contribution to the project's overall energy consumption. Construction is anticipated to consume 5,722.51 gallons of gasoline and 54,071.47 gallons of diesel. This would be a fraction of petroleum that would be consumed in California and countywide over the course of the construction period. Therefore, construction would have a less-than-significant impact with regards to regional energy supplies.

## Operation

As discussed under the previous thresholds, the project would result in an increased demand for electricity, natural gas, and petroleum. Design features would reduce the project’s energy consumption by what is required by the 2019 California Building Code Title 24 standards. The efficiency standards apply to new construction of both residential and nonresidential buildings and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting.

In addition, Pavley regulations reduced GHG emissions from California passenger vehicles by about 22% in 2012 and by about 30% in 2016, all while improving fuel efficiency. By 2025, when the Advanced Clean Cars rules are fully implemented, one in seven new cars sold in California (1.4 million) will be non-polluting or nearly so, including plug-in hybrids, fully electric battery-powered cars, and hydrogen-powered fuel cell vehicles (CARB 2012). Meanwhile, gasoline- and diesel-powered passenger vehicles would grow ever cleaner and more efficient. A variety of new technologies, from direct fuel injection to lower rolling resistance tires, will also cut pollution and create more energy-efficient vehicles (CARB 2012). As such, petroleum usage associated with operation of the project is anticipated to decrease over time due to a reduction in VMT in the region and advances in fuel economy. Therefore, impacts related to regional energy supplies and capacity during project operation would be less than significant.

## 3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS – Would the project:</b>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

A geotechnical report was prepared to analyze the geology of the project site and surrounding area. The Geotechnical Investigation Report is included as Appendix A to this MND.

**a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

**i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

The project site currently consists of a medical campus and retail building. The project proposes the expansion of an existing emergency department and the development of a MOB, introducing additional people to the project site. Faults that are located closest to the project site include the Whittier Earthquake Fault Zone and Raymond Hills Fault Zone. The Whittier Earthquake Fault Zone is approximately 6.0 miles southwest of the project site and the Raymond Hills Fault Zone is approximately 6.3 miles the north-northeast. As concluded in Appendix A, the project site is not located within an earthquake fault zone and is not located in proximity to a fault zone. Impacts related to risks from rupture of a known earthquake fault as part of project implementation would be less than significant.

**ii) Strong seismic ground shaking?**

As stated above, the project site is not located in or in proximity to a fault zone. Additionally, the design of the project would conform to all applicable federal, state, and local building codes, which would ensure

structural integrity. Impacts related to risks from strong seismic ground shaking as part of project implementation would be less than significant.

**iii) Seismic-related ground failure, including liquefaction?**

The project site is located in an area that is subject to liquefaction (DOC 2016b). As concluded in Appendix A, the project site is susceptible to liquefaction 15 feet below the existing grade (Appendix A). To support the structure, a deep foundation will be used to secure the project from experiencing impacts related to liquefaction and shrinking. Additionally, the design of the project would conform to all applicable federal, state, and local building codes. Impacts related to risks from seismic-related ground failure, including liquefaction as part of project implementation would be less than significant.

**iv) Landslides?**

The project site is relatively flat and is not located at the base of any hillsides, ridgeline, or slopes. Additionally, the project site has not been mapped as a landslide hazards area. No impact would occur.

**b) Would the project result in substantial soil erosion or the loss of topsoil?**

The project site consists of a previously developed medical campus and retail space. Potential erosion and sedimentation impacts would be temporarily increased during proposed construction, through activities such as grading, and removal of surface stabilizing features (e.g., vegetation and pavement). Developed areas would be most susceptible to erosion between the beginning of grading or construction and the installation of pavement or establishment of permanent cover in landscaped areas. However, short-term erosion and sedimentation impacts would be addressed through conformance with the National Pollutant Discharge Elimination System (NPDES) standards. Additionally, the project would be required to draft and implement an approved Stormwater Pollution Prevention Plan (SWPPP) and best management practices (BMPs), including appropriate measures to address erosion and sedimentation during construction. Implementation of the BMPs required pursuant to these permitting processes will ensure that erosion and sedimentation is managed to achieve regulatory water discharge standards. Once the project is in operation, the project site will be developed and would not result in the substantial erosion of topsoil. Impacts would be less than significant.

**c) Would the project 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?**

As stated above, the project site is relatively flat and is not located at the base of any hillsides, ridgeline, or slopes, and is not located in any known fault zones. Lateral spreading is unlikely to occur at the project site because the project site is relatively flat and is not located near water. Human or natural activities have the potential to cause subsidence; however, Appendix A concluded that the likelihood of subsidence occurring at the project site is low. As described above, the project site is in an area that is subject to liquefaction; however, a deep foundation will be used to secure the project from experiencing impacts related to liquefaction and shrinkage. Additionally, the design of the project would conform to all applicable federal, state, and local building codes, which would ensure structural integrity regardless of the characteristic of

the underlying soils. Therefore, impacts related to on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse would be less than significant.

**d) *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

The subsoil conditions of the project site include loose soils overlying medium dense to dense poorly graded sand, above more dense layers of sand with occasional gravel layers. Soils on the project site are considered to have very low expansion potential (Appendix A). The project site is not underlain by expansive soils and therefore impacts relating to risks to life or property from expansive soils would be less than significant.

**e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

The project would connect to existing wastewater infrastructure provided by the City of Baldwin Park. The project would not include the use of septic tanks or alternative wastewater disposal systems. **No impact** would occur.

**f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

According to surficial geological mapping at a 1:24,000 scale and the most current international stratigraphic chart, the project site is underlain by Holocene (<11,700 years ago) alluvial gravel deposits (map unit Qg) with finer-grained Holocene alluvial deposits (map unit Qa) mapped just to the south (Cohen et al. 2022; Dibblee and Ehrenspeck 1999). The gravel deposits are products of major streams transporting and depositing sediments derived from the San Gabriel Mountains and associated alluvial fans while the finer-grained alluvial deposits were deposited on floodplains and within valleys (Dibblee and Ehrenspeck 1999). Geotechnical borings indicated the project site is underlain by artificial fill varying in thickness from 5 to 12 feet, which in turn is underlain by alluvial deposits consisting of variable amounts of silts, sands, and gravels (Geobase 2015).

As identified in the City of Baldwin Park General Plan Initial study, no known paleontological resources are within the City. LSA Associates, Inc. (2015) requested and received a paleontological records search from the Natural History Museum of Los Angeles County (LACM) for a previously planned project within the current project site. The LACM records search results revealed no paleontological resource localities from within the project site; however, nearby localities (LACM 7701–7702) were reported from deposits similar to those underlying the project site at depth. These localities yielded fossil specimens including fish, salamander, snake, rabbit, and rodent from 11 to 34 feet below the ground surface.

As described above, current project design indicates that the maximum depth of ground disturbance for the MOB component at the Broken Horn site is 10 feet below the existing ground surface and a maximum depth of 65 feet below current grade for the drilling of caissons at the emergency department expansion component. In addition, ground disturbance associated with all other construction components, including site preparation, vegetation removal, and trenching for utility work is assumed to be no deeper than five feet below existing ground surface across the project site. While there are no known paleontological resources on the project site, due to the required grading and drilling for the project, the geologic units on

site that have the potential to contain paleontological resources at depth, and the moderate potential for the discovery of paleontological resources, mitigation measure **MM-GEO-1** is provided in the event excavation results in the unanticipated discovery of paleontological resources, and impacts would be reduced to less than significant with mitigation incorporated.

**Mitigation Measures**

MM GEO-1 Paleontological Resources Impact Mitigation Program and Paleontological Monitoring. Prior to commencement of any grading activity on site, the applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) (2010) guidelines. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the SVP (2010) guidelines and shall outline requirements for preconstruction meeting attendance and worker environmental awareness training, where monitoring is required within the proposed Project site at depths below 15 feet below the ground surface based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the preconstruction meeting and a qualified paleontological monitor shall be on site during all rough grading and other significant ground-disturbing activities (including augering). In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources, which if determined to be significant, will be curated into an accredited fossil repository, such as the Natural History Museum of Los Angeles County at the project proponent’s expense. Upon completion of project excavations requiring paleontological monitoring, the qualified paleontologist shall submit a final paleontological monitoring report to the project proponent and fossil repository (if fossils are discovered). The report shall detail the monitoring program’s results, analyses, and conclusions.

**3.8 Greenhouse Gas Emissions**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS – Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. There are currently no established thresholds for assessing whether the GHG emissions of a project, such as the project, would be considered a cumulatively considerable contribution to global climate change; however, all reasonable efforts should be made to minimize a project's contribution to global climate change. In addition, while GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008), GHG emissions impacts must also be evaluated at a project level under CEQA.

The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009). The State of California has not adopted emission-based thresholds for GHG emissions under CEQA. The Governor's Office of Planning and Research's Technical Advisory, titled Discussion Draft CEQA and Climate Change Advisory, states (OPR 2018):

Neither the CEQA statute nor the CEQA Guidelines prescribe thresholds of significance or particular methodologies for performing an impact analysis. This is left to lead agency judgment and discretion, based upon factual data and guidance from regulatory agencies and other sources where available and applicable. Even in the absence of clearly defined thresholds for GHG emissions, such emissions must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact.

Furthermore, the advisory document indicates that "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice" (OPR 2018). Section 15064.7(c) of the CEQA Guidelines specifies that "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008). This guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 metric tons (MT) of carbon dioxide equivalent (CO<sub>2</sub>e) per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008).

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and

revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

**Tier 1** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

**Tier 2** Consider whether or not the project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

**Tier 3** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO<sub>2</sub>e per year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO<sub>2</sub>e per year), commercial projects (1,400 MT CO<sub>2</sub>e per year), and mixed-use projects (3,000 MT CO<sub>2</sub>e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO<sub>2</sub>e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

**Tier 4** Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO<sub>2</sub>e per service population per year (MT CO<sub>2</sub>e/SP/year) for project level analyses and 6.6 MT CO<sub>2</sub>e/SP/year for plan level analyses. The 2035 efficiency targets are 3.0 MT CO<sub>2</sub>e/SP/year for project level analyses and 4.1 MT CO<sub>2</sub>e/SP/year for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

**Tier 5** Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

To determine the project's potential to generate GHG emissions that would have a significant impact on the environment, the project's GHG emissions were compared to the non-industrial land project quantitative threshold of 3,000 MT CO<sub>2</sub>e per year. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the project, which is assumed to be 30 years (SCAQMD 2008). In addition, the project is evaluated for its potential to conflict with various GHG emission reduction plans including local GHG reduction plans, CARB's Scoping Plan, SCAG's RTP/SCS, and statewide 2030 and 2050 GHG reduction targets identified in Senate Bill (SB) 32 and Executive Order (EO) S-3-05.

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

### Short-Term Construction Emissions

CalEEMod Version 2020.4.0 was used to estimate potential project-generated GHG emissions during construction. Construction of the project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. All details for construction criteria air pollutants discussed in Section 3.3 are also applicable for the estimation of construction-related GHG emissions. As such, see Section 3.3 for a discussion of construction emissions calculation methodology and assumptions used in the GHG emissions analysis.

The SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (2008) recommends that, “construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.” Thus, the total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the GHG significance threshold of 3,000 MT CO<sub>2</sub>e per year. Therefore, the determination of significance is addressed in the operational emissions discussion following the estimated construction emissions.

Construction of the project is assumed to last a total of approximately 41 months. Table 3.8-1 presents construction emissions for the project from on-site and off-site emission sources.

**Table 3.8-1. Estimated Annual Construction GHG Emissions**

Year	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
	Metric Tons per Year			
2023	110.62	0.03	<0.01	112.04
2024	149.24	0.04	<0.01	150.78
2025	29.01	0.01	<0.01	29.25
2028	124.22	0.02	<0.01	125.43
2029	183.08	0.03	<0.01	184.82
<b>Total</b>				<b>602.32</b>
<b>Amortized emissions over 30 years</b>				<b>20.08</b>

**Notes:** GHG = greenhouse gas; CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>e = carbon dioxide equivalent. See Appendix C for complete results.

As shown in Table 3.8-1, the estimated total GHG emissions during construction would be approximately 602 MT CO<sub>2</sub>e over the assumed construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 20 MT CO<sub>2</sub>e per year. Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis in the following text.

## Long-Term Operational Emissions

Emissions from the operational phase of the project were estimated using CalEEMod Version 2020.4.0. Operational years of 2026 (Emergency Department) and 2030 (Medical Office Building) were assumed consistent with completion of project construction. Potential project-generated operational GHG emissions were estimated for area sources (landscape maintenance), energy sources (natural gas and electricity), mobile sources, solid waste, water supply and wastewater treatment, and other sources of emissions (off-road equipment and yard trucks). Emissions from each category are discussed in the following text with respect to the project. For additional details, see Section 3.3 for a discussion of operational emission calculation methodology and assumptions, specifically for area, energy (natural gas), and mobile sources.

### Area Sources

CalEEMod was used to estimate GHG emissions from the project's area sources, which include operation of gasoline-powered landscape maintenance equipment, which produce minimal GHG emissions. See Section 3.3 for a discussion of landscaping equipment emissions calculations. Consumer product use and architectural coatings result in VOC emissions, which are analyzed in air quality analysis only, and little to no GHG emissions.

### Energy

The estimation of operational energy emissions was based on CalEEMod land use defaults and units or total area (i.e., square footage) of the project's land uses. The energy use (electricity or natural gas usage per square foot per year) from nonresidential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Emissions are calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kilowatt-hour for electricity or 1,000 British thermal units for natural gas) for CO<sub>2</sub> and other GHGs. Annual natural gas and electricity emissions were estimated in CalEEMod using the emissions factors for SCE, which would be the energy provider for the project site.

The current version of CalEEMod assumes compliance with the 2019 Title 24 Building Energy Efficiency Standards (CAPCOA 2021); however, the project would be required to comply with the 2022 Title 24 Standards at a minimum.

CalEEMod default energy intensity factors (CO<sub>2</sub>, methane, and nitrous oxide mass emissions per kilowatt-hour) for SCE is based on the value for SCE's energy mix in 2021. SB X1 2 established a target of 33% of energy from renewable energy sources for all electricity providers in California by 2020 and SB 100 calls for further development of renewable energy, with a target of 44% by 2024, 52% by 2027, and 60% by 2030.

### Mobile Sources

All details for criteria air pollutants discussed in Section 3.3 are also applicable for the estimation of operational mobile source GHG emissions. In summary, emissions associated with passenger vehicles and heavy-duty trucks traveling to and from the project site were estimated for the project using CARB EMFAC2017 vehicle emissions factors within the CalEEMod.

Regulatory measures related to mobile sources include AB 1493 (Pavley) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other

vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the National Highway Traffic Safety Administration and EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the project’s motor vehicles. The effectiveness of fuel economy improvements was evaluated by using the EMFAC2017 emission factors in CalEEMod to the extent it was captured for motor vehicles in 2026 and 2030 for the project.

### Solid Waste

The project would generate solid waste, and therefore, result in CO<sub>2</sub>e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste for the project.

### Water and Wastewater Treatment

Supply, conveyance, treatment, and distribution of water for the project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. The indoor and outdoor water use and electricity consumption from water use and wastewater generation were estimated using CalEEMod default values for the project.

Operation of the project would generate GHG emissions through motor vehicle trips; landscape maintenance equipment operation (area source); energy use (natural gas and electricity); solid waste disposal; water supply, treatment, and distribution and wastewater treatment; and other sources of emissions (off-road equipment). CalEEMod was used to calculate the annual GHG emissions based on the operational assumptions described in Section 3.3. The estimated operational project-generated GHG emissions are shown in Table 3.8-2.

**Table 3.8-2. Estimated Annual Operational GHG Emissions**

Emission Source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
	Metric Tons per Year			
<b>Emergency Department</b>				
Area	0.00	0.00	0.00	0.00
Energy	162.38	0.01	0.00	163.27
Mobile	256.78	0.02	0.01	260.49
Solid waste	48.87	2.89	0.00	121.06
Water supply and wastewater	8.40	0.09	0.00	11.35
			<i>Subtotal</i>	556.18
<b>Medical Office Building</b>				
Area	0.00	0.00	0.00	0.00
Energy	93.30	0.01	0.00	93.79
Mobile	763.03	0.05	0.04	774.87
Solid waste	72.35	4.28	0.00	179.23

**Table 3.8-2. Estimated Annual Operational GHG Emissions**

Emission Source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
	Metric Tons per Year			
Water supply and wastewater	12.43	0.14	0.00	16.81
	<i>Subtotal</i>			1,064.71
	<b>Total</b>			<b>1,620.89</b>
	<i>Amortized construction emissions</i>			20.08
	<b>Total operational + amortized construction GHGs</b>			<b>1,640.97</b>

**Notes:** GHG = greenhouse gas; CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>e = carbon dioxide equivalent. See Appendix C for complete results. Totals may not sum due to rounding.

As shown in Table 3.8-2, estimated annual project-generated GHG emissions would be approximately 1,621 MT CO<sub>2</sub>e per year as a result of project operations only. After accounting for amortized project construction emissions, total GHGs generated by the project would be approximately 1,642 MT CO<sub>2</sub>e per year. As such, annual operational GHG emissions with amortized construction emissions would not exceed the SCAQMD threshold of 3,000 MT CO<sub>2</sub>e per year. Impacts would be less than significant.

**b) Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

On May 7, 2020, SCAG’s Regional Council adopted Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy) for federal transportation conformity purposes only. The Regional Council approved the Connect SoCal in its entirety on September 3, 2020.

Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Because the project is not growth inducing, this type of consistency analysis does not apply. However, the major goals of the Connect SoCal are outlined in Table 3.8-3, along with the project’s consistency with them.

**Table 3.8-3. Project Consistency with the SCAG Connect SoCal RTP/SCS**

RTP/SCS Measure	Project Consistency
Encourage regional economic prosperity and global competitiveness.	<i>Consistent.</i> The project would bring up to 105 jobs to the City.
Improve mobility, accessibility, reliability, and travel safety for people and goods.	<i>Does not apply.</i> The project involves a medical facility and does not concern the movement of people or goods.
Enhance the preservation, security, and resilience of the regional transportation system.	<i>Does not apply.</i> The project would not inhibit SCAG from enhancing the resilience of the regional transportation system.
Increase person and goods movement and travel choices within the transportation system.	<i>Does not apply.</i> The project involves a medical facility and does not concern the movement of people or goods.
Reduce greenhouse gas emissions and improve air quality.	<i>Inconsistent.</i> The project would result in criteria air pollutant and GHG emissions during construction and operation.

**Table 3.8-3. Project Consistency with the SCAG Connect SoCal RTP/SCS**

RTP/SCS Measure	Project Consistency
Support healthy and equitable communities.	<i>Consistent.</i> The project involves the expansion of a medical facility, thus contributing to community health.
Adapt to a changing climate and support an integrated regional development pattern and transportation network.	<i>Does not apply.</i> The project would not inhibit SCAG from adapting to a changing climate and supporting an integrated regional development pattern and transportation network.
Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	<i>Does not apply.</i> The project would not inhibit SCAG from leveraging technology for the transportation system.
Encourage development of diverse housing types in areas that are supported by multiple transportation options.	<i>Does not apply.</i> The project would not inhibit SCAG from encouraging development of diverse housing types.
Promote conservation of natural and agricultural lands and restoration of habitats.	<i>Consistent.</i> The project would not impact natural lands during construction or operation.

**Source:** SCAG 2020.

**Note:** SCAG = Southern California Association of Governments; RTP/SCS = Regional Transportation Plan and Sustainable Communities Strategy; GHG = greenhouse gas.

As shown in Table 3.8-3, the project would be consistent with most applicable measures within the SCAG Connect SoCal RTP/SCS.

### Consistency with the California Air Resources Board’s Scoping Plan

The Scoping Plan (approved by CARB in 2008 and updated in 2014 and 2017) provides a framework for actions to reduce California’s GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations.<sup>4</sup> Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-global warming potential GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others.

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32 and establishes an overall framework for the measures that will be adopted to reduce California’s GHG emissions. Table 3.8-4 highlights measures that have been, or will be, developed under the 2008 Scoping Plan and presents the project’s consistency with Scoping Plan measures. The project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable to the project.

<sup>4</sup> The Final Statement of Reasons for the amendments to the State CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that “[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan” (CNRA 2009).

**Table 3.8-4. Project Consistency with 2008 Scoping Plan GHG Emission Reduction Strategies**

Scoping Plan Measure	Measure Number	Project Potential to Conflict
<b>Transportation Sector</b>		
Advanced Clean Cars	T-1	<i>No conflict.</i> The project’s employees and visitors would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase.
Low Carbon Fuel Standard	T-2	<i>Not applicable.</i> This is a statewide measure that cannot be implemented by a project applicant or lead agency. Nonetheless, this standard would be applicable to the fuel used by vehicles that would access the project site (i.e., motor vehicles driven by the project’s employees and visitors and heavy-duty trucks would use compliant fuels).
Regional Transportation-Related GHG Targets	T-3	<i>Not applicable.</i> The project is not related to developing GHG emission reduction targets. To meet the goals of SB 375, the 2016-2040 RTP/SCS is applicable to the project. The project would not preclude the implementation of this strategy.
Advanced Clean Transit	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Last-Mile Delivery	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Reduction in VMT	N/A	<i>No conflict.</i> The project would not prevent CARB from implementing this measure.
Vehicle Efficiency Measures 1. Tire Pressure 2. Fuel Efficiency Tire Program 3. Low-Friction Oil 4. Solar-Reflective Automotive Paint and Window Glazing	T-4	<i>No conflict.</i> These standards would be applicable to the light-duty vehicles that would access the project site. Motor vehicles driven by the project’s employees and visitors would maintain proper tire pressure when their vehicles are serviced. The project’s employees and visitors would replace tires in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase. Motor vehicles driven by the project’s employees and visitors would use low-friction oils when their vehicles are serviced. The project’s employees and visitors would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase. In addition, the project would not prevent CARB from implementing this measure.
Ship Electrification at Ports (Shore Power)	T-5	<i>Not applicable.</i> The project is not within a Port District and the project would not prevent CARB from implementing this measure.
Goods Movement Efficiency Measures 1. Port Drayage Trucks 2. Transport Refrigeration Units Cold Storage Prohibition	T-6	<i>Not applicable.</i> The project involves a medical facility and does not concern ports, TRUs, cargo, ships, or the movement of goods.

**Table 3.8-4. Project Consistency with 2008 Scoping Plan GHG Emission Reduction Strategies**

Scoping Plan Measure	Measure Number	Project Potential to Conflict
3. Cargo Handling Equipment, Anti-Idling, Hybrid, Electrification 4. Goods Movement Systemwide Efficiency Improvements 5. Commercial Harbor Craft Maintenance and Design Efficiency 6. Clean Ships 7. Vessel Speed Reduction		
Heavy-Duty Vehicle GHG Emission Reduction <ul style="list-style-type: none"> <li>▪ Tractor-Trailer GHG Regulation</li> <li>▪ Heavy-Duty Greenhouse Gas Standards for New Vehicle and Engines (Phase I)</li> </ul>	T-7	<i>No conflict.</i> Heavy-duty vehicles would be required to comply with CARB GHG reduction measures. In addition, the project would not prevent CARB from implementing this measure.
Medium- and Heavy-Duty Vehicle Hybridization Voucher Incentive project	T-8	<i>No conflict.</i> The project medium- and heavy-duty vehicles (e.g., delivery trucks) could take advantage of the vehicle hybridization action, which would reduce GHG emissions through increased fuel efficiency. In addition, the project would not prevent CARB from implementing this measure.
Medium and Heavy-Duty GHG Phase II	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
High-Speed Rail	T-9	<i>Not applicable.</i> The project does not include rail and would not prevent CARB from implementing this measure.
<b>Electricity and Natural Gas Sector</b>		
Energy Efficiency Measures (Electricity)	E-1	<i>No conflict.</i> The project would comply with the current Title 24 Building Energy Efficiency Standards. In addition, the project would not prevent CARB from implementing this measure.
Energy Efficiency (Natural Gas)	CR-1	<i>No conflict.</i> The project would comply with the current Title 24 Building Energy Efficiency Standards. In addition, the project would not prevent CARB from implementing this measure.
Solar Water Heating (California Solar Initiative Thermal Program)	CR-2	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Combined Heat and Power	E-2	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Renewables Portfolio Standard (33% by 2020)	E-3	<i>No conflict.</i> The electricity used by the project would benefit from reduced GHG emissions resulting from increased use of renewable energy sources.
Renewables Portfolio Standard (50% by 2050)	N/A	<i>No conflict.</i> The electricity used by the project would benefit from reduced GHG emissions resulting from increased use of renewable energy sources.

**Table 3.8-4. Project Consistency with 2008 Scoping Plan GHG Emission Reduction Strategies**

Scoping Plan Measure	Measure Number	Project Potential to Conflict
SB 1 Million Solar Roofs (California Solar Initiative, New Solar Home Partnership, Public Utility Programs) and Earlier Solar Programs	E-4	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
<b>Water Sector</b>		
Water Use Efficiency	W-1	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Water Recycling	W-2	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Water System Energy Efficiency	W-3	<i>Not applicable.</i> This is applicable for the transmission and treatment of water, but it is not applicable for the project. The project would not prevent CARB from implementing this measure.
Reuse Urban Runoff	W-4	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Renewable Energy Production	W-5	<i>Not applicable.</i> Applicable for wastewater treatment systems. In addition, the project would not prevent CARB from implementing this measure.
<b>Green Buildings</b>		
State Green Building Initiative: Leading the Way with State Buildings (Greening New and Existing State Buildings)	GB-1	<i>No conflict.</i> The project would be required to be constructed in compliance with state or local green building standards in effect at the time of building construction.
Green Building Standards Code (Greening New Public Schools, Residential and Commercial Buildings)	GB-1	<i>No conflict.</i> The project's buildings would meet green building standards that are in effect at the time of design and construction.
Beyond Code: Voluntary Programs at the Local Level (Greening New Public Schools, Residential and Commercial Buildings)	GB-1	<i>No conflict.</i> The project's buildings would meet green building standards that are in effect at the time of design and construction.
Greening Existing Buildings (Greening Existing Homes and Commercial Buildings)	GB-1	<i>No conflict.</i> This is applicable for existing buildings only; it is not applicable for portions of the project except as future standards may become applicable to existing buildings.
<b>Industry Sector</b>		
Energy Efficiency and Co-Benefits Audits for Large Industrial Sources	I-1	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Oil and Gas Extraction GHG Emission Reduction	I-2	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Reduce GHG Emissions by 20% in Oil Refinery Sector	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.

**Table 3.8-4. Project Consistency with 2008 Scoping Plan GHG Emission Reduction Strategies**

Scoping Plan Measure	Measure Number	Project Potential to Conflict
GHG Emissions Reduction from Natural Gas Transmission and Distribution	I-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Refinery Flare Recovery Process Improvements	I-4	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Work with the Local Air Districts to Evaluate Amendments to Their Existing Leak Detection and Repair Rules for Industrial Facilities to Include Methane Leaks	I-5	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
<b>Recycling and Waste Management Sector</b>		
Landfill Methane Control Measure	RW-1	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Increasing the Efficiency of Landfill Methane Capture	RW-2	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Mandatory Commercial Recycling	RW-3	<i>No conflict.</i> During both construction and operation of the project, the project would comply with all state regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act, as amended.
Increase Production and Markets for Compost and Other Organics	RW-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Anaerobic/Aerobic Digestion	RW-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Extended Producer Responsibility	RW-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Environmentally Preferable Purchasing	RW-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
<b>Forests Sector</b>		
Sustainable Forest Target	F-1	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
<b>High GWP Gases Sector</b>		
Motor Vehicle Air Conditioning Systems: Reduction of Refrigerant Emissions from Non-Professional Servicing	H-1	<i>No conflict.</i> The project's employees and visitors would be prohibited from performing air conditioning repairs and would be required to use professional servicing.
SF <sub>6</sub> Limits in Non-Utility and Non-Semiconductor Applications	H-2	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Reduction of Perfluorocarbons (PFCs) in Semiconductor Manufacturing	H-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Limit High GWP Use in Consumer Products	H-4	<i>No conflict.</i> The project's employees and visitors would use consumer products that would comply with the regulations that are in effect at the time of manufacture.

**Table 3.8-4. Project Consistency with 2008 Scoping Plan GHG Emission Reduction Strategies**

Scoping Plan Measure	Measure Number	Project Potential to Conflict
Air Conditioning Refrigerant Leak Test During Vehicle Smog Check	H-5	<i>No conflict.</i> Motor vehicles driven by the project's employees and visitors would comply with the leak test requirements during smog checks.
Stationary Equipment Refrigerant Management Program – Refrigerant Tracking/Reporting/Repair Program	H-6	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Stationary Equipment Refrigerant Management Program – Specifications for Commercial and Industrial Refrigeration	H-6	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
SF <sub>6</sub> Leak Reduction Gas Insulated Switchgear	H-6	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
40% Reduction in Methane and Hydrofluorocarbon (HFC) Emissions	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
50% Reduction in Black Carbon Emissions	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
<b>Agriculture Sector</b>		
Methane Capture at Large Dairies	A-1	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.

**Notes:** GHG = greenhouse gas; CARB = California Air Resources Board; SB = Senate Bill; RTP/SCS = Regional Transportation Plan and Sustainable Communities Strategy; VMT = vehicle miles traveled; N/A = not applicable; SF<sub>6</sub> = sulfur hexafluoride.

Based on the analysis in Table 3.8-4, the project would not conflict with the applicable strategies and measures in the 2008 Scoping Plan.

The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels codified by SB 32. Table 3.8-5 evaluates the project's potential to conflict with the 2017 Scoping Plan recommended actions.

**Table 3.8-5. Project Consistency with 2017 Scoping Plan Climate Change Policies and Measures**

Recommend Action Summary	Lead Agencies	Project Potential to Conflict
Implement SB 350 by 2030 <ul style="list-style-type: none"> <li>▪ Increase Renewable Portfolio Standard</li> <li>▪ Establish annual targets for statewide energy efficiency</li> <li>▪ Reduce GHG emissions in the electricity sector</li> </ul>	CPUC, CEC, CARB	<i>No conflict.</i> This action is directed towards policymakers and would not be directly applicable to the project. Nonetheless, the project would improve energy efficiency and reduce electricity-related GHG emissions when replacing older buildings and systems with newer, more efficient buildings and systems.
Implement Mobile Source Strategy (Cleaner Technology and Fuels) <ul style="list-style-type: none"> <li>▪ Increase zero emission and plug-in hybrid electric vehicles</li> </ul>	CARB, CalSTA, SGC, Caltrans, CEC, OPR, Local agencies	<i>No conflict.</i> The project's employees and visitors would operate vehicles that comply with applicable CARB regulations for cleaner technology and fuels.

**Table 3.8-5. Project Consistency with 2017 Scoping Plan Climate Change Policies and Measures**

Recommend Action Summary	Lead Agencies	Project Potential to Conflict
<ul style="list-style-type: none"> <li>▪ Increase GHG stringency on light-duty vehicles beyond Advanced Clean Cars</li> <li>▪ Medium- and heavy-duty GHG Phase II</li> <li>▪ Innovative Clean Transit</li> <li>▪ Last Mile Delivery</li> <li>▪ Further reduce VMT through SB 375 and regional Sustainable Communities Strategy</li> </ul>		
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets)	CARB	<i>No conflict.</i> This action is directed towards policymakers and would not be directly applicable to the project.
Adjust performance measures used to select and design transportation facilities by 2019	CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans	<i>No conflict.</i> The action is directed towards CARB and Caltrans.
Develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts) by 2019	CalSTA, Caltrans, CTC, OPR/SGC, CARB	<i>No conflict.</i> This action is directed towards policymakers and would not be directly applicable to the project.
Implement California Sustainable Freight Action Plan	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GoBiz	<i>No conflict.</i> The project would provide a regional hub for goods movement connecting the ports with the arterial goods distribution system.
Adopt a Low Carbon Fuel Standard with a carbon intensity reduction of 18%	CARB	<i>No conflict.</i> This action is directed towards CARB and would not be directly applicable to the project. In addition, the project would not result in an increase in operational vehicle trips.
Implement the Short-Lived Climate Pollutant Strategy by 2030	CARB, CalRecycle, CDFA, SWRCB, Local air districts	<i>No conflict.</i> The project would be required to comply with the Short-Lived Climate Pollutant Strategy to the extent it is applicable.
Develop regulations and programs to support organic waste landfill reduction goals in the Short-Lived Climate Pollutant Strategy and SB 1383 by 2019	CARB, CalRecycle, CDFA, SWRCB, Local air districts	<i>No conflict.</i> This action is not within the purview of this project.
Implement the post-2020 Cap-and-Trade Program with declining annual caps	CARB	<i>No conflict.</i> The project is not subject to the California Cap-and-Trade Program.
Develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink by 2018	CNRA and departments within, CDFA, CalEPA, CARB	<i>No conflict.</i> This action is not within the purview of this project. In addition, the project would not result in land use conversion that would reduce carbon storage.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	<i>No conflict.</i> This action is not within the purview of this project.

**Table 3.8-5. Project Consistency with 2017 Scoping Plan Climate Change Policies and Measures**

Recommend Action Summary	Lead Agencies	Project Potential to Conflict
Implement Forest Carbon Plan	CNRA, CAL FIRE, CalEPA and departments within	<i>No conflict.</i> This action is not within the purview of this project. In addition, the project components are located within developed urban areas and would not affect forested areas.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies and Local Agencies	<i>No conflict.</i> This action is not within the purview of this project.

**Source:** CARB 2017a.

**Notes:** SB = Senate Bill; GHG = greenhouse gas; CPUC = California Public Utilities Commission; CEC = California Energy Commission; CARB = California Air Resources Board; VMT = vehicle miles traveled; CalSTA = California State Transportation Agency; SGC = Strategic Growth Council; Caltrans = California Department of Transportation; OPR = Governor’s Office of Planning and Research; GoBiz = Governor’s Office of Business and Economic Development; IBank = California Infrastructure Economic Development Bank; DOF = Department of Finance; CTC = California Transportation Commission; CalEPA = California Environmental Protection Agency; CNRA = California Natural Resources Agency; CalRecycle = California Department of Resources Recycling and Recovery; CDFA = California Department of Food and Agriculture; SWRCB = State Water Resources Control Board; CAL FIRE = California Department of Forestry and Fire Protection.

Based on the analysis in Table 3.8-5, the project would not conflict with the applicable climate change policies and measures in the 2017 Scoping Plan.

**Consistency with EO S-3-05 and SB 32**

**Less-than-Significant Impact.** This section evaluates whether the GHG emissions trajectory after project completion would impede the attainment of the 2030 and 2050 GHG reduction goals identified in EOs B-30-15 and S-3-05.

**EO S-3-05.** This EO establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.

**SB 32.** This bill establishes for a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030.

CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that “California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32” (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update to the Climate Change Scoping Plan states the following (CARB 2014):

This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those

needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions.

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, EO B-30-15, and EO S-3-05. This is confirmed in the 2017 Scoping Plan, which states (CARB 2017a):

The Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities.

As previously discussed, total project emissions, including operation and amortized construction, would not exceed the SCAQMD significance threshold of 3,000 MT CO<sub>2e</sub> per year. As such, the project (without mitigation) would not generate GHG emissions that may interfere with the implementation of GHG reduction goals for 2030 and 2050. Impacts would be less than significant.

### 3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) ***Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

### Historical Project Site Uses

Prior to construction of the hospital, the project site was partially developed with apparent residential housing. Walnut Creek flowed through land where the hospital is now located. The surrounding areas were a mix of agricultural land and mixed-use development. Beginning in the 1960s, the main hospital site was a drive-in theater surrounded by a mix of residential and commercial properties. At this time, Walnut Creek was channelized to flow south of the project site, and the surrounding roadways were developed. The proposed MOB site was developed with the former Broken Horn Saddlery building in the 1970s, which remains to present day. The Broken Horn Saddlery operated until 2021; the building is now empty and the property unused. The proposed emergency department expansion area was a parking lot for a commercial site which adjoined the drive-in theater to the east until hospital development began in the early 1990s. The hospital was completed in the mid-1990s. The proposed emergency department expansion area is currently a concrete-paved sidewalk and landscaping on the southern side of the existing emergency department.

### Hazardous Material Sites

#### Cortese List Databases

Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop a Cortese List that is updated at least annually. While the CalEPA no longer maintains a single Cortese List, CalEPA uses the following databases and lists to meet the requirements of Government Code Section 65962.5.

1. List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) EnviroStor database.
2. List of Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker database.
3. List of solid waste disposal sites identified by State or Regional Water Board with waste constituents above hazardous waste levels outside the waste management unit.

4. List of “active” Cease and Desist Orders and Cleanup and Abatement Orders from State Water Board.
5. List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.

A search of the above-listed online databases was conducted to identify Cortese List sites on or adjoining the project site, or those which could potentially impact the project site based on level of contamination, proximity to the project site, and other environmental conditions. The project site was not identified in any of the Cortese List databases. One State Response Site was identified in the vicinity of the project site, the impacts of which overlap the project site. Area 2 of the San Gabriel Valley Superfund Site, known as “Baldwin Park Operating Unit (OU)” is an area of groundwater contamination that is more than 8 miles long and 1 mile wide, covering portions of the cities of Azusa, Irwindale, Baldwin Park, and West Covina. The contamination plume has been caused by multiple, commingled groundwater contamination plumes from multiple sources. Generally, groundwater depths are between 150 and 350 feet below ground surface within the plume area. Contaminants of concern (COCs) are trichloroethene (TCE), tetrachloroethene (PCE), carbon tetrachloride, perchlorate, n-nitrosodimethylamine (NDMA), and 1,4-dioxane. The Baldwin Park OU is undergoing large-scale groundwater extraction and treatment (pump-and-treat) operated by local water utilities to provide clean water to local users. The project site lies within the boundaries of Baldwin Park OU, and therefore groundwater beneath the site contains the COCs discussed above.

While clean water is provided to the project site by the City of Baldwin Park, the underlying groundwater contamination plume contains volatile organic compounds (VOCs) which can volatilize and have the potential to impact soil gas beneath the project site. This can also cause vapor intrusion into buildings constructed on the project site.

### Non-Cortese List Databases

In addition to Cortese List sites, there are hazardous material sites that do not meet the definition of a Cortese List site but still have hazardous material impacts such that they could be impacted by construction or operation of the proposed project. These may include voluntary cleanup sites or military cleanup sites. These are referred to herein as “non-Cortese List hazardous material sites”. A search was conducted to identify non-Cortese List hazardous material sites on or adjoining the project site, or those which could potentially impact the project site, based on level of contamination, proximity to the project site, and other environmental conditions.

Multiple sites were identified and reviewed within approximately one mile of the project site. Based on the type of contamination, regulatory status, and/or distance from the project site, none of these sites were determined likely to have impacted the environmental condition of the project site, and as such, the project would not impact contamination related to these sites.

### Oil and Gas

The California Department of Conservation’s Geologic Energy Management Division well finder database (CalGEM 2022) and the National Pipeline Mapping System (NPMS 2022) petroleum and hazardous material pipeline database were reviewed to identify oil and gas production and transportation features on or adjoining the project site. There are no oil and gas wells on or within one mile of the project site, nor is

the project site located within an active oil and gas field. There are no hazardous material or gas transmission pipelines located within one mile of the project site.

## Previous Environmental Investigations

### Medical Office Building

A Phase I Environmental Site Assessment (ESA) and Phase II ESA were completed on the proposed MOB portion of the project site in 2021 (Appendix D, Phases I and II Environmental Site Assessment). The Phase I ESA identified the Baldwin Park OU as a recognized environmental condition (REC) and potential vapor encroachment condition (VEC) and recommended an evaluation of subsurface conditions, which led to completion of the Phase II ESA. During the Phase II ESA, samples were collected from on-site soils, soil gas, sub-slab soil gas, indoor air, and groundwater. The samples were analyzed for the COCs identified in the Baldwin Park OU (VOCs) and the sample results were compared to regulatory screening levels. The following findings were reported:

- Soil samples did not contain concentrations of COCs above residential Environmental Screening Levels (ESLs),<sup>5</sup> nor did they contain arsenic above naturally occurring background levels.
- Groundwater, which was encountered at a depth of approximately 120 feet below ground surface and had a west-northwest flow direction, contained concentrations of perchlorate and 1,4-dioxane above regulatory screening levels for drinking water (California's Public Health Goal [PHG] and US EPA Maximum Contaminant Level [MCL]) in at least one of the collected samples.
- Soil gas samples collected from the parking lot contained concentrations of multiple VOCs above ESLs for residential land use, but below ESLs for commercial land use.
- Sub-slab soil gas samples collected from beneath the buildings identified PCE and TCE concentrations above residential and commercial ESLs at one sample location.
- Indoor air samples collected from inside the buildings identified multiple VOCs, including TCE, above residential and/or commercial ESLs.

### Emergency Department Expansion

A soil gas investigation was also conducted on the proposed emergency department expansion portion of the project site (Appendix E, Soil Vapor Sampling Report). During this investigation, soil gas samples were collected at two depths (five feet and 20 feet below ground surface) from eight separate soil boring locations within the footprint of the proposed emergency department expansion. Multiple VOCs were identified in soil gas at both depths. The COCs identified were similar to those identified at the MOB site. Detected concentrations of VOCs were compared to current regulatory screening levels, as follows:

- DTSC-SLs<sup>6</sup> for Commercial/Industrial Indoor Air with an attenuation factor (AF)<sup>7</sup> of 0.0005 for new commercial construction.<sup>8</sup>

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<sup>5</sup> San Francisco Regional Water Quality Control Board Environmental Screening Levels (ESLs), 2019.

<sup>6</sup> Department of Toxic Substances Control Screening Levels, 2020. (DTSC 2020).

<sup>7</sup> Attenuation factor is the assumed ratio of the indoor air concentration to the soil gas concentration.

<sup>8</sup> This attenuation factor is published in the Department of Toxic Substances Control Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance), published October 2011.(DTSC and CalEPA 2011b).

- EPA Regional Screening Levels (RSLs)<sup>9</sup> for Commercial/Industrial Indoor Air with an AF of 0.0005 for new commercial construction<sup>5</sup>. EPA RSLs were used where DTSC-SLs were not available.
- Dudek also evaluated DTSC-SLs for Commercial/Industrial Indoor Air with an AF of 0.03. The 2022 DTSC Vapor Intrusion Advisory (DTSC 2022) states that an “AF of 0.03 can be used for the initial evaluation of the potential for vapors to enter a building.” These screening levels are similar to ESLs (used by Terracon at the MOB site and developed using an AF of 0.03). The AF of 0.03, originally published by the US EPA, is based on several conditions that do not generally apply to new commercial construction in southern California. The San Francisco Regional Water Quality Control Board (RWQCB), who published the ESLs, also states ESLs are not intended to establish policy or regulation but are intended to help expedite and evaluate potential environmental concerns at contaminated sites.

None of the VOCs detected in soil gas at the proposed emergency department expansion were above commercial DTSC-SLs or EPA RSLs (AF 0.0005). Four VOCs, benzene, bromodichloromethane, chloroform, and vinyl chloride, were detected at concentrations above DTSC-SLs (AF 0.03) and ESLs.

As part of the soil gas investigation, Dudek also conducted a brief evaluation of human health risk using the highest detected concentration of each COC beneath the proposed emergency department expansion. Dudek evaluated both the current regulatory screening levels (DTSC-SLs and RSLs with AF 0.0005) and guidance screening levels (DTSC-SLs with AF 0.03 and ESLs).

- Using current commercial screening levels (DTSC-SLs and RSLs with AF 0.0005), the total estimated cancer risk is less than  $1 \times 10^{-6}$ , or one in one million, and the hazard index (for non-cancer risks) is less than 1. This is considered an acceptable risk for unrestricted land use.
- Using the guidance levels (DTSC-SLs with AF 0.03 and ESLs), the total estimated cancer risk is between  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$ , and the hazard index is less than 1. This is within the risk management range, where potential responses can be evaluated on a case-by-case basis and may include no response (DTSC and RWQCB, 2020).

## Summary of Previous Environmental Investigations

In summary, VOCs were identified in soil gas in both the proposed MOB and proposed emergency department expansion portions of the project site. Concentrations of VOCs were identified at the proposed MOB above residential ESLs (regulatory guidance levels), but below commercial ESLs (except for PCE and TCE in sub-slab soil gas in one location). Concentrations of VOCs were identified at the proposed emergency department expansion above commercial ESLs, which are inherently above residential ESLs. As the proposed project includes a medical care center, residential ESLs will be used to evaluate vapor intrusion risk to protect potential sensitive receptors.

## On-Site Hazardous Materials

The hospital has permitted storage and use of hazardous materials on site associated with hospital operations, including a diesel underground storage tank (UST). Other hazardous materials include compressed gases, propane, acids, bases, and antibacterials (CalEPA 2022). These chemicals are not used

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<sup>9</sup> U.S. Environmental Protection Agency Regional Screening Levels, 2015. (USEPA 2015).

or stored on the project site areas proposed for development. The Los Angeles County Fire Department is the local Certified Unified Program Agency (CUPA) responsible for permitting, inspecting, and regulating hazardous material use and storage on the project site.

The Broken Horn buildings were constructed in the 1970s, prior to bans on hazardous building materials such as asbestos and lead-based paints. The EPA released a partial ban on asbestos-containing materials in 1989, but a full ban on the use and marketing of asbestos-containing materials did not occur until April 2019. The United States also banned lead-based paint for use in housing in 1978; however, lead-based paint use in commercial structures was not included in this ban. Based on the age of the Broken Horn buildings, there is a potential for asbestos-containing materials (ACMs) and lead-based paints (LBP) to be present in site structures. In addition, universal waste items containing hazardous materials (e.g., polychlorinated biphenyls and mercury) may also be present.

**Construction.** Construction of the Project would include demolition of the existing buildings and hardscape at the MOB. Based on the age of the structures, there is a potential for asbestos-containing materials, lead-based paints, and other hazardous building materials to be present in the existing buildings. This is further discussed in the Phase I ESA prepared for the Broken Horn Property (Appendix D). Hazardous building materials could include mercury thermometers and switches, fluorescent bulbs, and polychlorinated biphenyl (PCB)-containing ballasts. Demolition of the buildings and transportation and disposal of the building materials could cause a release to the environment if they are present in the existing buildings, resulting in a potentially significant impact absent mitigation. All projects that involve commercial or industrial building renovations are required to comply with applicable federal, state, and local requirements, as summarized below.

1. For asbestos: South Coast Air Quality Management District (SCAQMD) Rule 1403; Cal/OSHA Asbestos and Carcinogen Unit; California Department of Public Health; California Department of Resources, Recycling, and Recovery (CalRecycle); and EPA National Emission Standards for Hazardous Air Pollutants (NESHAP).
2. For lead: California Labor Code Sections 6716 to 6717; CCR, Title 8, Section 1532.1 et seq.; CCR, Title 17, Section 35001 et seq.; Los Angeles County Environmental Health Lead Program; and EPA Lead Renovation, Repair, and Painting Rule
3. For universal wastes: DTSC universal waste rules; CalRecycle; and EPA Solid Waste Rules (40 CFR Part 273)

Because lead and hazardous building materials surveys are not explicitly required by law prior to demolition of a building, a survey will be required in accordance with **MM-HAZ-1** as stated below. Hazardous building materials identified in the survey will be managed in accordance with the rules and regulations outlined above. Demolition debris that contains hazardous materials would be segregated and disposed of or recycled off site. Transportation and disposal of these materials would be done in accordance with federal, state, and local laws and regulations. Material disposal and recycling would be completed at the closest available facilities to reduce travel times and distances.

Hazardous materials that may be used during construction and demolition activities of the proposed project include gasoline, diesel fuel, oil, lubricants, grease, welding gases (e.g., acetylene, oxygen, and argon), solvents, and paints. These materials would be used and stored in designated construction staging areas

within the boundaries of the Project site and would be transported, handled, and disposed of in accordance with all applicable federal, state, and local laws and regulations. The use of these materials for their intended purpose would not pose a significant risk to the public or environment. Hazardous wastes accumulated during Project construction may include unused or off-specification paint and primer, paint thinner, solvents, and vehicle- and equipment-maintenance-related materials, many of which can be recycled. Empty containers for such materials (e.g., drums and totes) may also be returned to vendors, if possible. Hazardous waste that cannot be recycled would be transported by a licensed hazardous waste hauler using a Uniform Hazardous Waste Manifest and disposed of at an appropriately permitted facility. The use of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials.

During construction, if hazardous materials and/or petroleum products are stored on the Project site above applicable regulatory thresholds, the applicable documents and plans will be submitted accordingly. These thresholds include those outlined in the Hazardous Material Business Plan rules (California Health and Safety Code, Division 20, Chapter 6.95, Article 1; 19 CCR, Division 2, Chapter 4) and Spill Prevention, Control, and Countermeasure Plan rules (SPCC; 40 CFR, Chapter 1, Subchapter D, Part 112). Appropriate plans would be prepared as required by regulation and submitted as required to the local Certified Unified Program Agency, which for the Project site is the LACoFD and kept on site through construction of the Project (SPCC Plans are not submitted to a regulatory agency). BMPs and spill prevention and response procedures required by these rules would be implemented.

**Operation.** Operation of the Project would not significantly increase or change existing operations that include the use of hazardous materials. The MOB would be an office building; hazardous material use would be limited to household and commercially available cleaning and maintenance products. The emergency department expansion would not increase the number of beds, and therefore would not likely significantly increase the use of existing hazardous materials, such as antibacterial products and compressed gasses, as discussed in the On-Site Hazardous Materials section above. Any additional hazardous materials would be added to existing permits and plans, in accordance with state and local rules and regulations (California Health and Safety Code, Division 20, Chapter 6.95, Sections 25500-25520; California Health and Safety Code, Division 20, Chapter 6.11, Sections 25404-25404.9).

**MM-HAZ-1 Pre-Demolition Hazardous Materials Abatement.** Demolition or renovation plans and contract specifications shall incorporate abatement procedures for the survey and removal of materials containing asbestos, lead, polychlorinated biphenyls, hazardous materials, hazardous wastes, and universal waste items. All abatement work shall be done in accordance with federal, state, and local regulations, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, U.S. Department of Housing and Urban Development, California Occupational Safety and Health Administration (which regulates employee exposure), and the South Coast Air Quality Management District.

With MM-HAZ-1 implemented, potential impacts would be reduced to less than significant with mitigation incorporated.

b) ***Would the project 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?***

**Construction.** As discussed in subsection (a) above, demolition of the buildings could cause a release of hazardous materials to the environment, including asbestos, lead, and other hazardous building materials. **MM-HAZ-1** requires a survey for hazardous building materials and lead-based paints, and state and local regulations require the survey for and abatement of asbestos and abatement of lead-based paints and other hazardous building materials. These hazardous building materials would be identified, removed, and disposed of in a manner that no longer creates a risk of potential upset or accident condition.

As discussed under Previous Environmental Investigations in subsection (a) above, two investigations have been conducted on the project site, a Phase II ESA on the MOB and a soil gas investigation on the emergency department expansion area. Both investigations identified COCs in soil gas, which could be released into the environment during earthmoving activities such as trenching, excavation, or grading, resulting in a potentially significant impact absent mitigation. This contaminated soil gas could impact the breathing zone for construction, excavation, and utility workers within the project area. **MM-HAZ-2** below requires a health and safety plan be prepared and implemented during earthwork activities which will include breathing zone monitoring and action levels to protect workers.

In addition, as discussed in subsection (a), hazardous materials handled during construction in reportable quantities would be reported, permitted, and handled in accordance with applicable local and state laws and regulations. These permits and associated material handling, control, and spill countermeasure plans are designed to prevent releases of hazardous materials, and how to immediately respond to and contain a hazardous material release, should it occur. Hazardous materials required for construction would not be handled on site in such quantities that a reasonably foreseeable upset or accident condition would likely occur.

**Operation.** The VOC-impacted soil gas has the potential to cause vapor intrusion into buildings, which could impact on-site hospital workers, visitors, and patients. The applicant has included in the project design the installation of sub-slab barriers, as presented in Section 2.3, Project Characteristics. As such, any risk of vapor intrusion from sub-slab soil gas would remain less than significant.

As discussed in the *Previous Environmental Investigations* section, identified concentrations are above current published guidance levels (DTSC-SLs with AF of 0.03 and ESLs). Further, indoor air sampling conducted in the proposed MOB portion of the project site in 2021 indicated that VOCs, including TCE, were present in the indoor air at concentrations above regulatory screening levels and guidance levels.

**MM-HAZ-2 Health and Safety Plan.** Any work conducted on the project site that includes excavation, grading, trenching, or other subsurface work shall implement a health and safety plan to protect on-site workers from potential exposure to VOC-contaminated subsurface soil gas. The health and safety plan shall include periodic work breathing zone monitoring for VOCs at least once every 15 to 30 minutes during active soil disturbing activities using an organic vapor analyzer (photoionization detector or similar). The health and safety plan shall include air monitoring action levels and actions to be taken if vapor concentrations approach or exceed action levels. The contractor or their designee shall implement the health and safety plan during any soil disturbing activities, to the satisfaction of the City of Baldwin Park Community Development Department.

With implementation of **MM-HAZ-2**, impacts associated with foreseeable upset or accident conditions causing release of hazardous materials would be reduced to less than significant with mitigation incorporated.

- c) ***Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

There are no existing or proposed schools located within 0.25 miles of the project site. As such, the project would not emit hazardous emissions or handle hazardous materials near a school, and **no impact** would occur.

- d) ***Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

While the project site is not located on a Cortese List site, it is located within the boundaries of the groundwater contamination plume associated with the Baldwin Park OU of the San Gabriel Valley Superfund Site. As discussed under *Cortese List Databases* in subsection (a), the underlying groundwater contamination plume has the potential to impact soil gas beneath the project site. As the COCs associated with this plume are VOCs, this can cause vapor intrusion into excavations during construction, and into buildings operated on the project site.

As discussed under Threshold (b), **MM-HAZ-2** and the installation of sub-slab barriers would protect on-site construction workers and occupants of future structures, respectively. As such, impacts related to a Cortese List site would be reduced to less than significant with mitigation incorporated.

- e) ***For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?***

The project site is not located within two miles of a public use airport, nor is it located within an airport land use planning area. The San Gabriel Valley Airport is located approximately 2.8 miles west-northwest of the project site in the City of El Monte. Based on the Airport Layout Plan Drawing Set (AECOM 2016), the airport influence areas, including conical surfaces and noise contours, do not overlap the project site. However, based on the project site location and an assumed building height of 30 feet above ground surface, the project site “is in proximity to a navigation facility and may impact the assurance of navigation signal reception.” As such, FAA requests filing the “Notice of Proposed Construction” under 14 CFR 77.9, “Construction or alteration requiring notice.” In accordance with 14 CFR 77.7, FAA Form 7460-1 shall be completed and submitted at least 45 days before start of proposed construction, or the date the construction permit application is filed, whichever is earlier. Construction would proceed once a “Determination of No Hazard to Air Navigation” is received from the FAA. With adherence to federal rules and regulations, **no impact** would occur.

- f) ***Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

Construction and operation would occur entirely within the project site footprint, with the exception of off-site improvements (Figure 3, Off-Site Improvements). Off-site improvements include new ADA compliant

driveways and ramps along the north side of Baldwin Park Boulevard, new sidewalks and replacement of damaged trees along Baldwin Park Boulevard and Leorita Street, and refurbishment of truncated domes along Dalewood Street. While road closures are not anticipated, any road closures or traffic reductions would require a permit through the City of Baldwin Park and/or Caltrans, depending on the jurisdictional authority of the road. As such, emergency evacuation needs would be evaluated and proper traffic control measures would be permitted to ensure no significant impacts with potential emergency needs.

The project would include the expansion of the existing emergency department. The existing emergency department would remain open during project construction and project construction would not be expected to substantially change the overall capacity of the emergency department in the case of an emergency. Once the project is operational the emergency department would increase the capacity to service the City during an emergency. Additionally, the project would comply with all applicable policies that are identified in the City's General Plan Safety Element. The project would be consistent with all Safety Element policies and would not impair the implementation of any emergency response procedures, therefore impacts to an adopted emergency response or emergency evacuation plan would be less than significant.

**g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?***

California Department of Forestry and Fire Protection (CAL FIRE) has developed maps of wildfire severity zones, which are organized by county. Within each county, CAL FIRE identifies wildfire severity zones as well as responsibility areas, either state responsibility areas, within which CAL FIRE would respond, or local responsibility areas, within which the local fire department would respond. The project site is located within a local responsibility area and is also located within a non-Very High Fire Hazard Severity Zone (non-VHFHSZ). The local fire response agency at the project site would be the Los Angeles County Fire Department (LACoFD). The nearest station is Station 29, located at 14334 Los Angeles Street, approximately 2.2 miles northeast of the project site.

LACoFD is also the local CUPA for the project site and would be the permitting agency for hazardous materials and hazardous wastes used, stored, and generated at the project site. In addition, LACoFD would be first emergency responder for the project site, including hazardous material incidents. The nearest 24-hour hazardous materials unit would be Haz Mat 43, 921 South Stimson Avenue, La Puente.

As outlined in the Public Safety Element of the City of Baldwin Park 2020 General Plan (City of Baldwin Park 2020), major evacuation routes established near the project site are eastbound and westbound along San Bernardino Road, southbound along Baldwin Park Boulevard to Amar Road, and southbound Frazier Street to I-10.

Overall, the project is not anticipated to expose people or structures to wildfires, and a less than significant impact would occur.

### 3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY – Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following analysis is based on the Hydrology and Hydraulics Report prepared for the proposed project by Psomas and is included as Appendix F, Hydrology and Hydraulics Report.

**a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

The project site is currently developed and consists of an existing medical campus and retail building. The project would include the demolition of the existing retail site, construction of a MOB, and emergency department expansion. Sources of polluted runoff could include, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, bacteria and viruses, pesticides, sediments, and nutrients could occur as a result of project uses. The proposed demolition, grading, and construction associated with the project could create additional sources of pollution which could potentially cause short term impacts to water quality. Impacts related to pollution from sedimentation would occur when soil would be exposed during project grading and construction. Once construction is complete, runoff would be conveyed to the City's storm drainage system.

Project construction activities would be subject to RWQCB requirements related to erosion control, sedimentation, and runoff prevention. Implementation of a SWPPP along with site-specific BMPs would ensure that the project achieves water quality standards with regard to its stormwater discharges off the site. Therefore, impacts would be less than significant.

**b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

The proposed project would include the expansion of an existing emergency department and the construction of a MOB. The project site currently consists of a medical campus and abandoned retail building. The project would not introduce new impervious surfaces to the project site and would not interfere with groundwater recharge. The project site is located within the San Gabriel Valley groundwater basin, which is designated as a very low priority (DWR 2022). As discussed in Section 3.19, Utilities and Service Systems, the San Gabriel Valley Water District is expected to adequately supply water for the project. The project would not require any additional groundwater extraction and would not deplete groundwater supplies. The project would not impede sustainable groundwater management and impacts would be less than significant.

**c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***

**i) *result in substantial erosion or siltation on or off site;***

The project site is currently developed. During the demolition of the abandoned retail space and project construction, there would be increased potential for erosion on site from exposed soils. Once the project site is in operation, the project site would be covered by impervious surfaces. As described in Appendix F, runoff from the project site would converge into existing storm drains along Baldwin Park Boulevard. and would not result in alteration to drainages off site. Therefore, the project would not result in substantial erosion or siltation due to changes in drainage patterns. Impacts would be less than significant.

**ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;***

As discussed above, the project site is developed and primarily consists of impervious surface. Project implementation would not substantially increase the impervious area on the project site because it is currently developed (Appendix F). Additionally, the project site is relatively flat and does not currently result in flooding. On-site drainage facilities and off-site drainage connections would be designed to collect and convey runoff from 100-year storm events. Implementation of the proposed project is not expected to impede or redirect flood flows and would be less than significant.

**iii) *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or***

As discussed above, the proposed project would not drastically change the amount of surface runoff that is leaving the project site. The project site would be designed for runoff to be conveyed to storm drains located along Baldwin Park Boulevard. Additionally, runoff resulting from project implementation would not substantially increase (Appendix F). As discussed in Section 3.19, the project would not exceed the existing capacity of the City's stormwater drainage systems. Because the project would not substantially change the runoff contributing to the drainage systems, impacts would be less than significant.

**iv) *impede or redirect flood flows?***

The project would not increase the impervious surface area on site in comparison to existing conditions, which would keep runoff flow rates or volumes similar to existing conditions (Appendix F). Additionally, the project site and the immediate area is relatively flat and does not currently result in flooding during storms. On-site drainage facilities and off-site drainage connections would be designed to collect and convey runoff from 100-year storm events. Implementation of the proposed project is not expected to impede or redirect flood flows and impacts to stormwater drainage would be less than significant.

**d) *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?***

The project site is approximately 30 miles inland from the Pacific Ocean and would not be subject to inundation by tsunami. Additionally, the project site is not located in a flood hazard zone (FEMA 2008). Given that the project site is not located near a large standing body of water, inundation by seiche (or standing wave) is considered negligible. No impact would occur.

**e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

The project site is located within the San Gabriel Valley groundwater basin. This basin is considered a very low priority basin and therefore not required to prepare a sustainable groundwater management plan. Additionally, the City of Baldwin Park does not have a water quality control plan. Therefore, the project would not conflict with the implementation of a water quality control plan or sustainable groundwater management plan. No impact would occur.

### 3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING – Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) *Would the project physically divide an established community?***

The proposed project site is located on a medical campus that is bound by Dalewood Street (north), Baldwin Park Boulevard (southeast), Bess Ave (southwest), and Leorita Street (east). The emergency department expansion component would be located within the boundary of the existing medical campus. The MOB component would be located at acquired a retail space adjacent to the existing medical campus boundary, that would expand the northeast corner of the medical campus. Implementation of the project would not physically divide an established community because both project components would redevelop in an area that has already been developed; impacts would be less than significant.

**b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

The City of Baldwin Park’s General Plan and Municipal Code regulate planning and development within the city. The project site is currently zoned as Freeway Commercial (FC) and has a land use designation of General Commercial (GC) (Figure 4, Land Use Designation). The project’s consistency with the City of Baldwin Park’s General Plan and Municipal Code is discussed below.

**Baldwin Park Municipal Code**

Baldwin Park Municipal Code Section 153.050 ensures compatibility of commercial and industrial uses with adjacent land uses. As described above, the project is zoned as freeway commercial (Figure 5, Zoning). Per Table 153.050.020 in the Baldwin Park Municipal Code, Offices are a permitted use, and Hospitals are permitted with a conditional use permit (CUP) within the Freeway Commercial zone. The freeway commercial designation permits a maximum Floor Area Ration (FAR) of 1.0 for commercial and industrial land uses and the proposed project would have a FAR ratio of 0.71. The project would require a variance from the development standards set forth in Table 153.050.030 for Commercial and Industrial Zones to allow for an overhead projection from the building façade to encroach 2 feet, 10 inches within the required 10-foot front yard setback along Baldwin Park Blvd. This projection would provide shade for the patients of

the hospital. With the exception of the variance from development standards, the project would be compatible with all zoning regulations for the freeway commercial zone. The requested variance from the Municipal Code has been analyzed as part of this MND and would not yield an effect on the environment. Therefore, impacts related to consistency with the Baldwin Park Municipal Code would be less than significant.

### City of Baldwin Park General Plan

Applicable land use goals and policies within the City's Land Use Element consist of encouraging revitalization of underutilized development and commercial development, (Goal 3 and Policy 1.4); compatibility between new and existing development (Goal 2), reduction of impacts from noise, traffic, parking, light and glare, and difference in scale (Policies 2.5, 2.6, and 2.7); and compliance with NPDES and water quality requirements (Goal 18 and Policy 18.1). As described above, the project would include the redevelopment of an abandoned retail site into a MOB that would serve the existing medical campus. As discussed in Sections 3.1, Aesthetics; 3.13, Noise; and 3.17, Transportation, the project would not result in significant impacts related to visual incompatibility, noise, and traffic. Additionally, the project would comply with NPDES and water quality requirements, as described in Section 3.10, Hydrology and Water Quality.

The project site has been identified as being located within the Bess/Garvey/I-10 Freeway General Plan Focus Area. The goal for this area is to encourage low intensity commercial and industrial uses that do not require easy freeway access and is oriented to serve the local resident and business population. Applicable policies for this focus area include Policy 17.1 (relocate uses, consolidate lots to create sites for cohesive development). The project would be consistent with this use as it would expand the existing emergency department and construct a MOB. The emergency department and MOB would help provide healthcare to the community of Baldwin Park. Additionally, the project would replace an abandoned retail store and replace it with a MOB that would serve as part of the existing medical campus. This would consolidate healthcare services and provided cohesive development with the existing medical campus.

The project would be consistent with the General Plan Health and Safety Element by replacing removed trees removed along Baldwin Park Boulevard (Action HS-3.17 and Baldwin Park Municipal Code Section 153.165.090), providing LID features (Action HS-4.4), providing recycling and trash enclosures on site (Action HS-6.8); would include drought tolerant landscaping (Policy 8.01); and would not substantially increase impervious surfaces on site (Policy 8.03).

The project would be consistent with the General Plan Economic Development Element by redeveloping an abandoned retail site along the I-10 corridor (Policy 5.1). As concluded in Section 3.17, Transportation, the project would be consistent with the Circulation Element goals and policies. As discussed in Section 3.13, Noise, the project would conform with the standards within the General Plan Noise Element. The General Plan Open Space and Conservation and Public Safety Element did not include goals or policies that were applicable to this project or were previously addressed in other elements.

While the project would request a variance from the development standards set forth in Table 153.050.030, the variance would not result in an effect on the environment. Additionally, the project would be consistent with the General Plan and remainder of municipal code and impact would be less than significant.

### 3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES</b> – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?***

The entire City of Baldwin Park is designated as a Mineral Resource Zone 2 (MRZ-2) by the state Geologist since 1982. The MRZ-2 designation is an area where “adequate information indicated that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists” (City of Baldwin Park 2020). Given that the project site and the majority of the City is already developed, mineral extraction or mining would be incompatible with the existing zoning of the project site due to the site being previously developed. No impact would occur.

**b) *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?***

As stated above, the City of Baldwin Park General Plan has identified the entire city as being within MRZ-2 but has not identified a locally important mineral resource recovery site. Additionally, because the project site has been previously developed, mineral extraction and mining would be an incompatible use. No impact would occur.

### 3.13 Noise

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

- a) ***Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

#### Construction Noise

Construction noise is considered a short-term impact and would be considered significant if construction activities exceed the allowable hours of operation as permitted by the FTA’s advisory threshold of 80 dBA  $L_{eq}$  over an 8-hour daytime period at a residential land use. Noise-sensitive land uses in the vicinity of the project include residences to the southwest of the EDE (approximately 800 feet from the construction boundary), and to the west of the new MOB (approximately 90 feet from the construction boundary). Two calculation scenarios were analyzed and are described as follows:

- Usage of the shortest activity-to-receptor distance for the loudest equipment type and quantity associated with the studied construction phase, with less noisy equipment types at successive distance increments of 50 feet; and
- An “acoustic centroid” approach, akin to the FTA general assessment technique for estimating construction noise, whereby all listed equipment for a construction phase is represented by a common location at the geographic center of the studied construction zone or area.

Project-generated construction noise will vary depending on the construction process, the type of equipment involved, the location of the construction site with respect to sensitive receptors, the schedule

proposed to carry out each task (e.g., hours and days of the week), and the duration of the construction work. Project construction noise for each of the six distinct phases was calculated using a spreadsheet-based model emulating the Federal Highway Administration (FHWA) Roadway Construction Noise Model (FHWA 2008). Table 3.13-1 shows that prediction results of both scenarios yield predicted 8-hour daytime  $L_{eq}$  values exceed the aforesaid FTA guidance threshold of 80 dBA.

**Table 3.13-1. Construction Noise Modeling Results**

Receiver Location (distance [ft] to loudest construction equipment)	Construction Noise Level (8-hour dBA $L_{eq}$ ) by Construction Phase						
	Land Use	Demolition	Site Preparation	Grading	Building Construction	Paving	Architectural Coating
<i>Closest Distance</i> from EDE to Southwest Receptor (~725 feet)	Residential	58	56	57	53	55	44
<i>Closest Distance</i> from MOB to West Receptor (~60 feet)	Residential	82	80	80	77	78	71
<i>Acoustic Center</i> from EDE to Southwest Receptor (~935 feet)	Residential	56	54	55	52	53	42
<i>Acoustic Center</i> from MOB to West Receptor (~210 feet)	Residential	71	68	69	66	68	56

**Source:** Attachment B of Appendix G.

As previously discussed, the City’s Noise Ordinance does not establish quantitative construction noise standards; however, Section 130.37 Special Noise Sources (E) of the City’s Municipal Code restricts noise-generating construction activities to the hours from 7:00 a.m. to 7:00 p.m. The construction contractor would thus be required to comply with these noise regulations prescribing the hours allowed for construction activity. Were the FTA guidance limit of 80 dBA  $L_{eq}$  to be applied as a standard, Table 3.13-1 informs that the predicted noise level exposure at the off-site receptor closest to the MOB construction boundary (i.e., a distance of only 60 feet) is 82 dBA and exceed this standard by 2 dB. Hence, despite construction activity hours complying with City regulations, project construction noise impacts would be potentially significant and would require mitigation.

**On-Site Operational Noise**

Implementation of the project would result in changes to existing noise levels on and around the project site by developing new stationary sources of noise, including introduction of additional outdoor HVAC equipment. These sources may affect noise-sensitive vicinity land uses off the project site.

## Rooftop HVAC

### EDE Sound Sources

Based on the available architectural and mechanical roof plans and other design information for the proposed EDE, there is a 7-foot barrier raised 18 inches off the roof deck surrounding a single custom air-handling unit (AHU) and four exhaust fans. Rooftop AHU fan and exhaust fan reference sound levels were available from the EDE design plans and “product data” information submittals.

### MOB Sound Sources

For the analysis of noise emission from outdoor-exposed HVAC equipment operating on the roof of the proposed MOB, net building cooling load and minimum air infiltration was calculated with an estimation technique (Storm 2018) using the gross square footage (GSF) and expected functions or usage of the interior building spaces. With these inputs, net refrigeration tonnage and minimum outside air volume was calculated and then used to size and quantify a number of air handling unit return air fans and air-cooled chillers, for which online manufacturer data was consulted to quantify reference sound emission levels for this anticipated MOB rooftop equipment.

### Sound Propagation Prediction

The aggregate noise emission from these EDE and MOB outdoor-exposed HVAC sound sources has been predicted with the Datakustik CadnaA sound propagation program. Table 3.13-2 presents the predicted aggregate noise level exposures from these operating EDE and MOB HVAC systems at each of four nearby off-site noise-sensitive receptors (i.e., existing residences). Predicted levels shown in Table 3.13-2 range between 9 to 40 dBA hourly  $L_{eq}$ , which is below the City’s noise standard of 45 dBA  $L_{eq}$  for single-family residential properties. Figure 6, Noise Measurement Locations and Contours, displays the location of the studied noise-sensitive receptors and noise contours.

**Table 3.13-2. Stationary Operations Noise Modeling Results**

Studied Noise-Sensitive Receptor (approximate address)	Predicted Project-Attributed Noise Exposure Level at Nearby Noise-Sensitive Receptors
	Project HVAC (dBA hourly $L_{eq}$ )
R1 (13226 Bess Avenue)	18.3
R2 (13101 Bess Avenue)	9.4
R3 (1019 Leorita Street)	30.8
R4 (Proposed EDE Façade)	39.8

**Notes:**  $L_{eq}$  = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels; HVAC = heating, ventilating, and air-conditioning. See Figure 2 of Appendix G for locations of studied noise-sensitive receptors.

### Parking Lot Activity

A comprehensive study of noise levels associated with surface parking lots was published in the Journal of Environmental Engineering and Landscape Management (Baltrėnas et al. 2004). The study found that average noise levels during the peak period of use of the parking lot (generally in the morning with arrival of commuters, and in the evening with the departure of commuters), was 47 dBA at 1 meter (3.3 feet) from

the outside boundary of the parking lot. The project employee parking spaces for the proposed EDE would be within the existing parking garage for the hospital. The project employee parking spaces for the proposed MOB are proposed surrounding the new building.

Accounting for sound attenuation due to additional distance travelled, the MOB parking lot noise contribution logarithmically combined with the project’s HVAC-only predicted noise levels appearing in Table 3.13-3 would still be below the City’s noise standard of 45 dBA  $L_{eq}$  at the studied nearest noise-sensitive residential properties (R3). It is also well below the ambient noise level range of 63 to 70 dBA  $L_{eq}$  measured adjacent to the project as exhibited in Table 6 of Appendix G, Noise Technical Memorandum.

### Project-Generated Off-Site Traffic Noise

The project is expected to generate a total of -340 trips to the roadway system, primarily due to the removal of the apparel store that currently exists where the proposed MOB would be constructed. As shown in Table 2-1 of the project’s Transportation Technical Memorandum, during the PM peak hour, approximately nine passenger vehicles are estimated to enter or exit the project site. Utilizing this information, as well as additional traffic data shown in Attachment C of Appendix G, an emulator based on the FHWA’s Highway Traffic Noise Prediction Model RD-77-108 was used to estimate potential noise impacts at adjacent noise-sensitive uses. Information used in the model included posted traffic speeds, truck mix percentage (for urban streets, found in the U.S. Environmental Protection Agency’s Background Document for Medium and Heavy Truck Noise Emission Regulations, 1976), and expected level-of-service C traffic volumes (for urban streets, found in the Transportation Research Board’s Highway Capacity Manual, 2000). Consistent with Caltrans guidance (Caltrans 2013), this analysis assumes 80% of the ADT occurs during daytime hours (7:00 a.m. to 7:00 p.m.), 5% during the evening (7:00 p.m. to 10:00 p.m.), and 15% during the nighttime (10:00 p.m. to 7:00 a.m.).

The change in roadway noise levels was predicted for two conditions: existing and existing plus project. Traffic noise levels found in Table 3.13-3 are calculated for roadway segments bounded by intersections within the project area and are listed as follows:

- Baldwin Park Boulevard – From Amar Road to Dalewood Street,
- Bess Avenue – From Frazier Street to Baldwin Park Boulevard,
- Leorita Street – From Bess Avenue to Dalewood Street, and
- Dalewood Street – From Frazier Street to Baldwin Park Boulevard.

**Table 3.13-3. Predicted Roadway Noise Change - Existing plus Project**

Modeled Roadway Segment	Existing Noise Level (dBA CNEL)	Existing Plus Project Noise Level (dBA CNEL)	Project-Related Noise Level Increase (dBA)
Baldwin Park Blvd.: Amar Rd. – Dalewood St.	71.9	71.9	0.0
Bess Ave.: Frazier St. – Baldwin Park Blvd.	63.8	63.8	0.0
Leorita St.: Bess Ave. – Dalewood St.	63.0	63.0	0.0
Dalewood St.: Frazier St. – Baldwin Park Blvd.	67.5	67.5	0.0

Source: Attachment C of Appendix G.

As shown in Table 3.13-3, none of the roadways is predicted to receive an increase in noise levels as a result of the additional project traffic. In the context of community noise (i.e., outside of a controlled environment) a change in noise levels of less than 3 dBA is not perceptible to the average human listener. Additionally, based upon the FICON thresholds (FICON 1992), an increase of less than 5 dBA when the ambient sound level is less than 60 dBA  $L_{dn}/CNEL$ , less than 3 dBA when the ambient sound level is less than between 60 and 65 dBA  $L_{dn}/CNEL$ , or less than 2 dBA when the ambient sound level is greater than 65 dBA  $L_{dn}/CNEL$  would not be substantial.

## Conclusion

As described above, the project would exceed the City's threshold related to short term construction noise would be potentially significant. Implementation of Mitigation Measure **MM-NOI-1** would reduce construction noise to be within the City's adopted daytime threshold for construction to reduce impacts to be less than significant with mitigation incorporated. Additionally, all operational noises from the project were determined to be less than significant with mitigation incorporated.

## Mitigation Measure

The following mitigation measure shall be implemented as part of project implementation:

**MM-NOI-1** The following recommendations from Appendix G shall be implemented by the construction contractor to reduce construction noise on site, to the satisfaction of the City of Baldwin Park Community Development Department:

- All construction equipment must have appropriate sound muffling devices, which shall be properly maintained and used at all times such equipment is in operation.
- The project contractor shall place stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site.
- The construction contractor shall locate on-site equipment staging areas so as to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest the Project site during the construction period.
- All noise producing construction activities, including warming-up or servicing equipment and any preparation for construction, shall be limited to the hours between 7:00 a.m. and 7:00 p.m.

**b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?***

The primary source of ground-borne vibration occurring as part of the project is construction activity. The primary concern associated with ground-borne vibration is annoyance; however, in extreme cases, vibration can cause damage to buildings, particularly those that are old or otherwise fragile. Some common sources of ground-borne vibration are trains, and construction activities such as blasting, pile-driving, and heavy earth-moving equipment.

Ground-borne vibration information related to construction/heavy equipment activities has been collected by Caltrans. Information from Caltrans indicates that transient vibrations (such as from construction activity) with approximately 0.035 inches per second PPV may be characterized as barely perceptible, and vibration levels of 0.24 inches per second PPV may be characterized as distinctly perceptible (Caltrans

2020). According to Caltrans, D-8 and D-9 Caterpillars, earthmovers, and trucks have not exceeded 0.10 inches/second PPV at 10 feet (Caltrans 2020). Since the closest off-site residence is located approximately 90 feet away from likely heavy construction equipment, vibration from construction activities at the closest sensitive receiver would not exceed the significance threshold of 0.20 inches/second PPV. Moreover, because the off-site residential homes feature wood-frame construction on foundation pads or footings, FTA guidance indicates that a “coupling loss” of -5 VdB can be applied to the groundborne vibration received by the structure and thus result in an attenuated VdB level of 65 that is compatible with the aforementioned interpretation of the City’s vibration standards (i.e., perception unaided by instruments).

As for existing on-site Kaiser Baldwin Park structures, vibration impacts attributed to project construction are not anticipated to be significant for the following reasons:

- Vibration-sensitive instruments and operations (e.g., operation rooms and medical imaging [i.e., MRI] facilities) are sufficiently distant from expected project construction areas, so that propagated groundborne vibration will attenuate with distance—or be impeded or dissipated by intervening masses such as existing structural foundations and multi-story building masses. Distance sufficiency in this context would be a minimum of 36 feet between—for purposes of illustration—an operating large bulldozer or comparable engine-driven heavy construction equipment and a potentially sensitive receptor, assuming a threshold of 72 VdB (for operating rooms, per FTA guidance [FTA 2018]) and applying a coupling loss of -10 VdB due to existing on-site structures being representative of multi-story “large masonry” buildings. The construction area of the new MOB to be implemented by the project meets this criterion and is physically separated from the campus vibration-sensitive buildings by the extensive pre-existing parking structures.
- Where the project involves renovation and new construction within this 36-foot distance, such as the vicinity of the EDE, the architectural plans indicate that the project will implement careful “phasing” of construction that involves temporary relocation of existing potentially vibration-sensitive activities, processes, and receptors to other on-site campus areas that are more distant from or would otherwise be protected from the adverse effects of excessive vibration attributed to the project.

Based on these predictive calculations and findings, impacts associated with ground-borne vibration resulting from project construction would be less than significant.

- c) ***For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

The San Gabriel Valley Airport (SGVA) is located approximately 2.85 miles northwest of the project site. The project site is located outside of the Airport Influence Area as shown in the Los Angeles County Airport Influence Area map. Therefore, no impact would occur.

### 3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING – Would the project:</b>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) ***Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

The proposed project includes the expansion of an existing emergency department, and the redevelopment of an existing retail space into a MOB. The project would not introduce any new housing as part of the project but would expand the capacity of the medical campus with the MOB and expanded emergency department. The project is expected to result in the number of employees at the project site by 105.

The Southern California Association of Governments forecasts population growth at a local and regional level for six counties in southern California including Los Angeles County and Baldwin Park. As Shown in Table 3.14-1, Employment within Baldwin Park is expected to increase by 3,000 jobs by 2040. The increase of 105 jobs from the project would represent 3.5% of the total expected increase in jobs for the City. Therefore, the addition of 105 jobs would be within the forecasted growth of jobs within the area.

**Table 3.14-1. City of Baldwin Park Population and Employment Forecast**

	Actual 2012	Forecasted 2020	Forecasted 2035	Forecasted 2040	% Change (2012-2040)
Population	76,100	77,700	81,500	83,600	9.9%
Employment	16,500	17,900	18,900	19,500	18.2%

Source: SCAG 2016.

The current emergency department expansion is intended to eliminate the existing and projected treatment bay deficits in the emergency department through 2027. The project would not expand any other existing utilities or infrastructure as part of either project component. As addressed under Section 3.19 the project

would connect to existing utilities (water, power, sewer, etc.) and would not require any expansion that could indirectly lead to population growth.

In conclusion, the project is expected to introduce 105 jobs to the City, which is within the forecasted growth of employment for the City and the project would not require the expansion of infrastructure from the introduction of these jobs. Direct or indirect impacts from unplanned population growth would be less than significant.

**b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

The proposed emergency department expansion and MOB would occur within the medical campus and would replace an existing retail building. The project would not displace any existing people or residences through project implementation. No impact would occur.

### 3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XV. PUBLIC SERVICES**

a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:***

***Fire protection?***

The City of Baldwin Park contracts out their fire protection services to the County of Los Angeles Fire Department (LACFD 2021). The closest fire station to the project site is Los Angeles County Fire Department Station 168, located approximately 1.3 miles away at 3207 Cogswell Rd, El Monte, California 91732. As concluded in Section 3.14, Population and Housing, the project would not result in a substantial increase in population to the area, and therefore would not result in the increased demand for fire protection services to the project site. Additionally, as concluded below in Section 3.20, Wildfire, the project would not result

in an increase of risk of fire hazards to the project site, which also would not result in an increased demand for fire protection services. Physical impacts associated with the addition of new fire protection facilities resulting from the project would be less than significant.

***Police protection?***

The City of Baldwin Park has its own police department that provides police protection to the City. The only Baldwin Park Police Station is located approximately 2.0 miles away from the project site at 14403 Pacific Avenue, Baldwin Park, California 91706. The project would include the expansion of the emergency department and construction of a MOB. As concluded in Section 3.14, the project would not result in a substantial increase in population to the area, and therefore would not result in the increased demand for police protection services to the project site. Additionally, the project would be required to pay a development impact fee for law enforcement facilities, vehicles, and equipment infrastructure, as required by Baldwin Park Municipal Code Section 154.060. Physical impacts associated with the addition of new police protection facilities resulting from the project would be less than significant.

***Schools?***

The project does not have a residential component and as concluded in Section 3.14, the project would not result in a substantial increase in population to the area, and therefore would not result in the increased demand for schools servicing the project site. Physical impacts associated with the addition of new schools resulting from the project would be less than significant.

***Parks?***

The project does not have a residential component and as concluded in Section 3.14, the project would not result in a substantial increase in population to the area, and therefore would not result in the increased demand for schools servicing the project site. Physical impacts associated with the addition of new parks resulting from the project would be less than significant.

***Other public facilities?***

The project does not have a residential component and as concluded in Section 3.14, the project would not result in a substantial increase in population to the area, and therefore would not result in the increased demand for any other public facilities servicing the project site. Physical impacts associated with the addition of new public facilities resulting from the project would be less than significant.

### 3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVI. RECREATION</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) ***Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

As stated above, the project consists of the expansion of an existing emergency department and the redevelopment of an existing retail building to a MOB and will not include a residential component. As concluded in Section 3.14 the project is not expected to substantially increase population growth in the area and therefore would not substantially increase the uses of the recreational facilities in proximity to the project site. No impact would occur.

b) ***Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?***

The project consists of the expansion of an existing emergency department and the redevelopment of an existing retail building to a MOB. The project would not include any recreational facilities. No impact would occur.

### 3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION – Would the project:</b>				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following analysis is based on the Transportation Assessment Report prepared for the proposed project by LLG Engineers and is included as Appendix H, Transportation Assessment Report.

**a) *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

The project proposes the expansion of an existing emergency department and the construction of a MOB. The Circulation Element of the General Plan outlines goals and policies that ensure adequate traffic capacity and parking; and encourages the use of alternative modes of transportation and the use of public transportation. As discussed in Appendix H, the project site would accommodate pedestrian and bicycle access via on-site walkways that connect to existing sidewalks off site and providing bicycle parking facilities on site. Additionally, the project would not generate a significant number of trips and is not expected to reduce the level of service (LOS) surrounding the project site (Appendix H). Therefore, due to the project’s consistency with the Circulation Element, impacts from conflicts with transportation policies would be less than significant.

**b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***

The City adopted VMT metric is included within the *City of Baldwin Park Transportation Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment*. As described in Appendix H, the City’s Guidelines state that: projects that generates less than 110 daily trips may be screened from conducting a formal VMT analysis and presumed to have a less than significant VMT impact. The project would generate 44 trips during the weekday AM peak hour and would result in a decrease of 48 trips in the weekday PM peak hour. The number of trips that would be generated by the project would be less than 110 daily trips and the project would screen out of further VMT analysis . Therefore, due to the small nature of the project, the project screens out of the need for VMT analysis and impacts would be less than significant.

**c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

The project site currently functions as a medical campus with the Internal circulation on the medical campus would remain the same. The addition of the MOB component campus would provide an entrance to the MOB via Leorita Street, which is a 2- lane local street. This new entrance would be designed to meet

the design requirements codified in the California Fire Code and would not include any hazardous design features. Additionally, the project is consistent with the zoning designation and would not introduce any incompatible uses to the area. Therefore, the project would not introduce hazards due to a geometric design feature and impacts would be less than significant.

**d) Would the project result in inadequate emergency access?**

The project site has multiple access points along Baldwin Park Boulevard, Dalewood Street, Bess Avenue, and Leorita Street. All driveways provide access to parking facilities, the hospital, and medical office buildings. The project would not change any of the key access and driveways within the medical campus (Appendix H). As described above, the driveway for the MOB would be designed to meet the design requirements codified in the California Fire Code. The project would not result in inadequate emergency access to the project site and impacts would be less than significant.

### 3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVIII. TRIBAL CULTURAL RESOURCES</b>				
Would the project 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), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a,b) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? Or, 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?*

As described in Section 3.4, Biological Resources, a CHRIS records search was completed by staff at the South Central Coastal Information Center (SCCIC) on July 11, 2022. No cultural resources were identified within the project site (Appendix I, Draft Archaeological Resources Assessment). In addition to a CHRIS records search, a SLF records search was requested on July 22, 2022, to determine the presence of any Native American cultural resources within the project site. The NAHC SLF records search results were positive for known Native American heritage resources within the proposed Project site. Results of the SLF provided relate to the general regional area within and surrounding the study area and do not necessarily equate to the existence of resources within the specific area occupied by the current proposed Project site. The NAHC identified the Gabrieleno Band of Mission Indians – Kizh Nation, as well as eight additional Native American individuals who would potentially have specific knowledge as to whether or not Native American cultural resources are identified within the Project site that could be at-risk. Outreach letters were mailed on September 28, 2022, to all NAHC-listed traditionally geographically affiliated tribal representatives that have requested project notification. To date, one tribe (Gabrieleno Band of Mission Indians- Kizh Nation) have responded. City AB 52 consultation is carried out by the City as the lead agency and is currently ongoing.

Following a consultation call between the City and the tribe on December 6<sup>th</sup>, 2022, the Gabrieleno Band of Mission Indians- Kizh Nation (Tribe) provided an email follow up that included a number of attachments on December 7, 2022. Attachments included ethnohistoric and historical archival research pertaining to traditional use of the area, letters form technical experts and the NAHC, and recommended mitigation measures. The Tribe further indicated that the project falls within the traditional village location of Awinga. At the request of the tribe, this information will be maintained as confidential and appended to this document (Confidential Appendix J). Among other specific details pertaining to these management strategies, recommended mitigation includes inclusion of a Native American monitor that is designated or approved by the Tribe during ground disturbing activities and actions to be taken in the event of an unanticipated discovery of human remains and/or funerary objects.

While strong evidence of traditional Native American use of this broader area has been provided through review of archival documentation, a specific known TCR, meeting definitions applied in CEQA, does not appear to have been identified through consultation. However, despite the current disturbed state of the project site, there remains the potential for the project to encounter previously unknown and unanticipated TCRs during construction of the project. The City, having considered these factors, including information and recommended management strategies provided by the Tribe, has determined that additional management strategies will be required. In the event that unknown tribal cultural resources are encountered during Project implementation, impacts to these resources are potentially significant and mitigation is required.

Tribal cultural resources are most commonly cultural resources and/or human remains of Native American origin. As such, implementation of previously identified mitigation measures **MM-CR-1** through **MM-CR-4**) are appropriate management strategies to be applied to tribal cultural resources. This observed, tribal cultural

resources also constitute a separate resource category under CEQA; tribes, through the government-to-government consultation process are provided the opportunity to identify tribal cultural resources that may be affected by the project and interpret the significance of such resources. Having reviewed and considered all information provided through this process, the ultimate responsibility to determine the appropriate management approach is the lead agency for compliance with CEQA. In order to appropriately reflect this process and provide for the inadvertent discovery of tribal cultural resources during project activities, a separate mitigation measure is provided below. Specific mitigation requirements, as developed by the Tribe and agreed to by the applicant, are provided in Confidential Appendix J. Implementation of **MM-TCR-1** would include the requirement for a Native American monitor to be invited to be present in order to ensure potential impacts to tribal cultural resources as a result of ground-disturbing activities on the project site would remain be reduced to less than significant with mitigation incorporated.

Mitigation Measure **MM-CUL-1** through **MM-CUL-4** would ensure that measurements are in place for the proper treatment of any inadvertently discovered archaeological resources and potential impacts to archaeological resources and human remains would be reduced to less than significant with mitigation incorporated.

**MM-TCR-1** Inadvertent Discovery of Tribal Cultural Resources. Management strategies stipulated in **MM-CUL-1** through **MM-CUL-4** shall be implemented in the event that project activities encounter cultural resources or human remains. In addition, a Native American representative, compensated by and contracted directly with the applicant, shall be provided the opportunity to monitor during earth disturbing activities. This monitor shall be provided by the consulting tribe(s). Should an inadvertent discovery be Native American in origin and have potential to meet the definition of a tribal cultural resource (as defined by PRC Section 21074) the city, or other designated representative, shall notify consulting Native American tribes. Designated representatives from these tribes shall be provided a reasonable period of time to conduct a site visit and make recommendations regarding future ground disturbance activities as well as the treatment and disposition of any discovered tribal cultural resources. Implementation of proposed recommendations shall proceed in compliance with CEQA and other regulatory requirements and be made based on the determination of the City that the approach is reasonable and feasible.

### 3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:</b>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) ***Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

The project would include the expansion of an existing emergency department and the construction of a MOB.

#### Water

San Gabriel Valley Water Company currently services the project site. The San Gabriel Valley 2020 Urban Water Management Plan (UWMP) analyzes the water demand and water supply for 2020 to 2045. The 2020 UWMP analysis is based off of projected growth rates from the 2020-2045 SCAG Regional Transportation Plan/ Sustainable Communities Strategy of the SCAG which incorporates existing land use and general plan land use policies to help project growth for the region. Total water use in 2020 was

estimated to be 33,632 and is projected to increase to 38,700 MG by 2045. The projected water supplies for the district are expected to match the projected demand (San Gabriel Valley Water Company 2021).

The project would increase the number of treatment bays to the existing emergency department and would include the construction of a MOB. Water use during construction is expected to be temporary and minimal. The expansion of the emergency department would increase the number of treatment bays from 38 to 60. While the project would increase the water use on the project site, the project would be consistent with the land use designation for the site which was factored into the UWMP projections. Additionally, the project would implement new building code which will include water conservation standards compared to older buildings.

In conclusion, the increase in water usage from the project is expected to be met by the San Gabriel Valley Water Company during normal, and dry years, and would not require the construction of new facilities to supply water to the area and impacts would be less than significant.

### **Wastewater Treatment**

The City's sewer system includes 106 miles of sewers, three pump stations and is managed through the Department of Public Works (City of Baldwin Park 2021b). Operational and maintenance services are provided through the County of Los Angeles Consolidated Sewer Maintenance District (CSMD). Wastewater from the City is treated at the San Jose Creek Water Reclamation Plant. The San Jose Creek Reclamation Plant has a capacity to treat 100 million gallons of wastewater per day (MGD) (LACSD 2022). The project proposes the expansion of an existing emergency department and the construction of a MOB. Wastewater during construction is expected to be temporary and minimal. The project applicant would be required to obtain a will serve letter from the CSMD. This increase in wastewater from the project represents a small portion of the available capacity for the San Jose Creek Water Reclamation Plant. The will serve letter would ensure that CSMD would be able to adequately serve the project site and not require the construction of new facilities to provide services to the project site. Therefore, impacts to wastewater facilities would be less than significant.

### **Stormwater Drainages**

As discussed in Section 3.10, Hydrology and Water Quality, the project would not substantially increase the volume or rate of runoff from the project site. As concluded in Appendix F, runoff from the project site would remain relatively the same as current conditions. Project implementation would not result in the need to expand or create new stormwater facilities, and therefore impacts would be less than significant.

### **Electric Power**

As discussed in Section 3.6, Energy, the project would consume approximately 1,013,592.11 kWh per year and the non-residential electricity demand in 2020 was 42,736,774,915 kWh (42,737 gigawatt-hours) for Los Angeles County (CEC 2020). Electricity use during project construction would be temporary and negligible. As such, the project would have a negligible impact on demand for Los Angeles County and SCE. The project would not significantly increase demand for electricity and would not require the expansion of or construction of electric power facilities, therefore impacts would be less than significant.

## Natural Gas

As discussed in Section 3.6, Energy, natural gas is not anticipated to be required during construction of the project, and the project operation is estimated to consume approximately 1,771,660 kilo-British thermal units per year. The non-residential natural gas consumption in 2020 was 1,698,687,468 kilo-British thermal units for Los Angeles County (CEC 2020). As such, the project would have a negligible impact on demand for Los Angeles County and SCE. The project would not significantly increase demand for natural gas and would not require the expansion of or construction of natural gas facilities, therefore impacts would be less than significant.

## Telecommunication Facilities

The project site is currently served by various telecommunication service distributors. Communications systems for telephones, computers, and cable television are serviced by utility providers such as AT&T, Spectrum, Viasat, and other independent cable companies. The project would introduce additional demand for telecommunication services as it would introduce a new MOB and an expanded emergency department; however, no specific systems upgrades are proposed or anticipated for the proposed project. Due to the existing infrastructure served in the surrounding project area, the proposed project would not result in impacts associated with the construction or expansion of telecommunications, and impacts are determined to be less than significant

- b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?***

As described above, the San Gabriel Valley Water Company services the project site. Water is supplied through multiple sources including groundwater and recycled water. The San Gabriel Valley 2020 Urban Water Management Plan (UWMP) analyzes the water demand and water supply for 2020 to 2045. The 2020 UWMP analysis is based off projected growth rates from the 2020-2045 SCAG Regional Transportation Plan/ Sustainable Communities Strategy of the SCAG which incorporates existing land use and general plan land use policies to help project growth for the region. The projected water supplies for the district are expected to match the projected demand during normal, dry, and multiple dry years (San Gabriel Valley Water Company 2021). While the project would increase the water use on the project site, the project would be consistent with the land use designation for the site which was factored into the UWMP projections. The increase in water usage from the project is expected to be met by the San Gabriel Valley Water Company during normal, and dry years, and would not require the construction of new facilities to supply water to the area and impacts would be less than significant.

- c) *Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

As described above, wastewater from the City is treated at the San Jose Creek Water Reclamation Plant. The San Jose Creek Reclamation Plant has a capacity to treat 100 million gallons of wastewater per day (MGD) (LACSD 2022). The project proposes the expansion of an existing emergency department and the construction of a MOB. Wastewater during construction is expected to be temporary and minimal. This increase in wastewater from the project represents a small portion of the available capacity for the San

Jose Creek Water Reclamation Plant. Additionally, the project applicant would be required to obtain a will serve letter from the CSMD. The project would not substantially increase the wastewater from the project site and therefore impacts to wastewater facilities would be less than significant.

- d) ***Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

### Construction

As described in Section 2, the project would occur in two phases. During construction of Phase I of the project, the existing retail building on the broken horn site would be demolished in addition to the expansion of the emergency department. Construction of Phase II would include the construction of the proposed MOB. Construction of the project would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, plastics, and demolition material from the demolition of the abandoned retail building. Municipal Code Chapter 53 requires the submittal of a Construction and Demolition Waste Materials Management Plan for the construction and demolition waste generated by the project (City of Baldwin Park 2022c).

### Operation

Once the project is operational, the project would increase the intensity of uses at the project site and generate more solid waste compared to the existing emergency department and abandoned retail site. Solid waste generated by the project would be serviced by WM, and solid waste would then be transferred to Azusa Landfill. According to CalRecycle, the facility has a daily permitted capacity of 8,000 tons per day for solid waste. (CalRecycle 2019a)

The anticipated operational solid waste generation from the project was estimated using CalRecycle's Estimated Solid Waste Generation Rates (CalRecycle 2019b). It is estimated that the emergency department expansion (increase of 22 treatment bays) would generate approximately 352 pounds of solid waste per day (16 pounds per bed) and the MOB component (33,000 sq ft) would generate approximately 198 pounds of solid waste per day (0.006 pounds per square foot) for a total of 550 pounds per day of waste (CalRecycle 2019b). This total does not consider any waste diversion through recycling which is required by Baldwin Park Municipal Code Chapter 50.

The project would be required to comply with applicable state and local regulations related to solid waste, waste diversion and recycling at the time of development. Implementation of the project is not expected to generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and impacts related to solid waste is determined to be less than significant.

- e) ***Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

As described above, the project would be required to comply with all federal, state, and local statues and regulations related to solid waste, diversion of waste, and recycling. All solid waste facilities, including landfills, require solid waste facility permits to operate. In Los Angeles County, Public Resources Code

(Sections 44001–44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.) authorizes the County Department of Environmental Health, Local Enforcement Agency to issue solid waste facility permits. Azusa Land Reclamation Landfill is a permitted facility and Waste Management is a licensed hauler. For these reasons, and the reasons stated above, impacts related to solid waste as a result of project implementation would be less than significant.

### 3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XX. WILDFIRE</b> – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?***

As described above in Section 3.9, the City of Baldwin Park Emergency Operations Plan is used to prepare the city for a variety of types of emergencies that the City. As identified in the EOP, risk of wildfire is low given the geographic location of the City; however, other threats have the potential to impact the City (City of Baldwin Park 2017). The project would include the expansion of an existing emergency department and the construction of a MOB. The existing emergency department would remain open during project construction and would not be expected to substantially change the overall capacity of the emergency department in the case of an emergency. Once the project is operational the emergency department would increase the capacity to service the City during an emergency. Additionally, the project would comply with all applicable policies that are identified in the City’s General Plan Safety Element, such as implementing

the Uniform Building Code's seismic safety standards. The project would be consistent with all Safety Element policies and would not impair the implementation of the EOP, therefore impacts to an adopted emergency response or emergency evacuation plan would be less than significant.

- b) *Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

The project site is located in a heavily urbanized area and is not located within a high fire hazard severity zone (HFHSZ) (CAL FIRE 2022). The project site is located in the City of Baldwin Park in the valley floor of the heavily urbanized San Gabriel Valley. The region is susceptible to heatwaves, droughts, and prevailing winds, all which increase the risk of wildfires (City of Baldwin Park 2021), but due to the heavily developed nature of the project site and the surrounding area, the wildfire risk at the site is considered low. Additionally, the project components would be built to the most recent fire code standards. Impacts would be less than significant.

- c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

As described above, the project site is located within a heavily urbanized area and represents a low wildfire risk. The project would expand an existing emergency department and introduce a MOB to the project site. As described above in Section 3.18, Tribal Cultural Resources, both project components would not require the installation of new utility infrastructure. Maintenance of associated infrastructure surrounding the site would be similar to maintenance of the current medical campus. Additionally, as described above, the project is located within a highly developed area with low fire risk. The project would not introduce any new infrastructure or require maintenance of infrastructure that would exacerbate fire risk and impacts would be less than significant.

- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

As stated above, the project would have a low risk for wildfire due to the developed nature of the project site and the surrounding area. Additionally, the project site consists of relatively flat terrain due to the previous development in the area and the location of the project at the valley floor in the San Gabriel Valley and would not expose people or structures to slope instability. As discussed in Section 3.10, drainage on the project site would be similar to that of existing conditions. Due to the low fire risk and the flat terrain at the project site, the project would not expose people or structures to risks as a result of runoff, post-fire slope instability, or drainage changes and impacts would be less than significant.

## 3.21 Mandatory Findings of Significance

- a) ***Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?***

As described in Section 3.4, Biological Resources, the project site consists of urban/developed area. Due to the developed nature of the project site, the project site does not include habitat that would support fish or wildlife species. Furthermore, no federally or state-listed as endangered plant or wildlife species have potential to occur on the project site. As concluded in Section 3.4, the project would result in less than significant impacts related to biological resources.

Additionally, as discussed in Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources, there is potential for unanticipated discovery of Cultural or Tribal Cultural Resources. Impacts to archaeological and tribal cultural resources would be **less than significant** with the incorporation of MM-CUL-1 (refer to Section 3.5, Cultural Resources).

- b) ***Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?***

As addressed throughout this document, the project would have either no impact, a less-than-significant impact, or a less-than-significant impact with mitigation incorporated with respect to all environmental impact areas. Cumulative impacts of several resource areas have been addressed in individual resource sections, including Section 3.3, Air Quality, and Section 3.8, Greenhouse Gas Emissions, and concluded that cumulative impacts would be less than significant.

Given the nature of the project, potential cumulative impacts could occur during the temporary construction work if other nearby projects occur in the same timeframe. However, given the small scale of the proposed project, the potential for the project to contribute to a cumulative impact when combined with another past, present, and reasonably foreseeable construction projects is unlikely.

As described under Section 3.17, project operation would generate a minimal number of trips during operations, and in turn, would generate minimal criteria air pollutant emissions, greenhouse gas emissions, and noise. The analysis of these impacts is inherently cumulative in nature, and thus the conclusions that they are less than significant (either with or without mitigation) apply to both project-specific and cumulative impacts. Other resource areas including Aesthetics; Agricultural and Forestry Resources; Biological Resources, Energy; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Noise, Population and Housing; Public Services; Recreation; Transportation; Utilities and Services Systems; and Wildfire, were determined to have a less than significant or no impact relative to existing conditions; thus, the project would not contribute to cumulative impacts related to these environmental topics. Other issue areas (Cultural Resources, Hazards and Hazardous Materials; Geology and Soils, and Tribal Cultural

Resources) are, by their nature, project- and/or site-specific, and impacts at one location do not add to impacts at other locations or create additive impacts.

Moreover, no other resource area impacts analyzed as part of this MND, would substantially increase when operation of the proposed project is considered in combination with cumulative projects identified in the vicinity. Therefore, operational impacts associated with these combined projects would be negligible. Furthermore, the proposed project, as with potential cumulative projects, would incorporate mitigation measures to reduce impacts and would be required to comply with applicable City and state plans and policies.

For all resource areas analyzed, project impacts would be reduced to less-than-significant or less- than significant with mitigation included levels, which would, in turn, reduce the potential for these impacts to be considered an additive to an existing cumulative impact. For these reasons, impacts would less than significant.

**c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

As evaluated throughout this document, with the incorporation of mitigation, potential environmental impacts associated with the project would be reduced to less-than-significant levels. Therefore, with mitigation incorporated, the project would not directly or indirectly cause substantial adverse effects on human beings, and impacts would be less than significant.

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## 4.2 List of Preparers

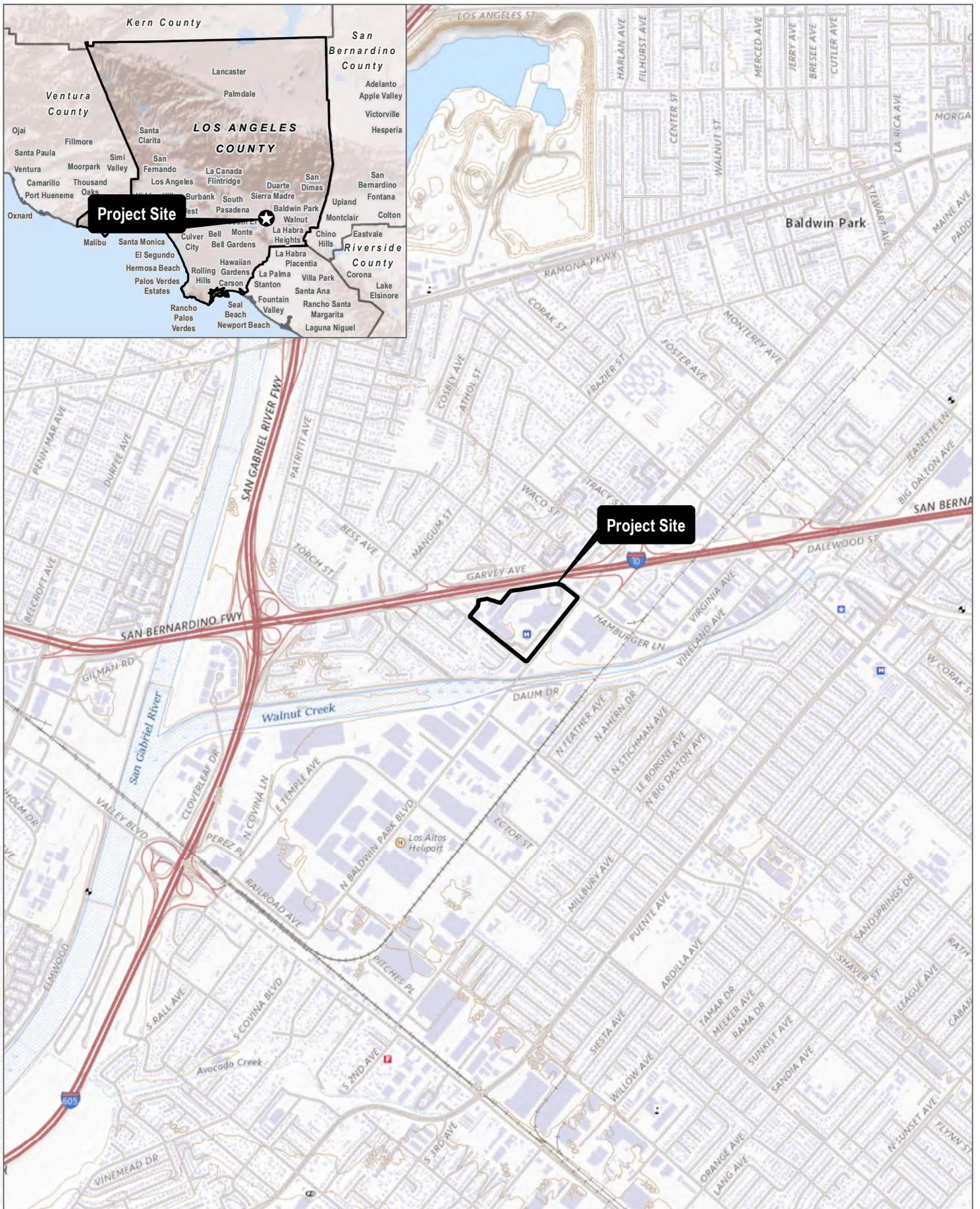
### City of Baldwin Park

Ron Garcia, Director of Community Development  
Jack Wong

### Dudek

Shawn Shamlou, AICP, Project Director  
Erin Lucett, Environmental Planner

Adam Giacinto, M.A., RPA, Archaeologist  
Linda Kry, B.A., RA, Archaeologist  
David Faith, M.A, RPA Archaeologist  
Claire Cancilla, MSHP, Architectural Historian  
Caitlin Greely, MA, Architectural Historian  
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Adam Poll, Senior Air Quality Specialist  
Shane Russett, Air Quality Specialist  
Mark Storm, INCE Bd, Environmental Acoustician  
Cert.; Cole Martin, INCE, Environmental Acoustician  
Jason Greenstein, GIS Specialist  
Kathryn Landoe, Technical Editor  
Steve Taffolla, Publications Specialist



SOURCE: USGS National Map 2022

FIGURE 1

Project Location



Kaiser Baldwin Park Emergency Department Expansion and Medical Office Building Project

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SOURCE: Bing Maps 2020; HMC Architects 2021

**FIGURE 2**  
Site Plan

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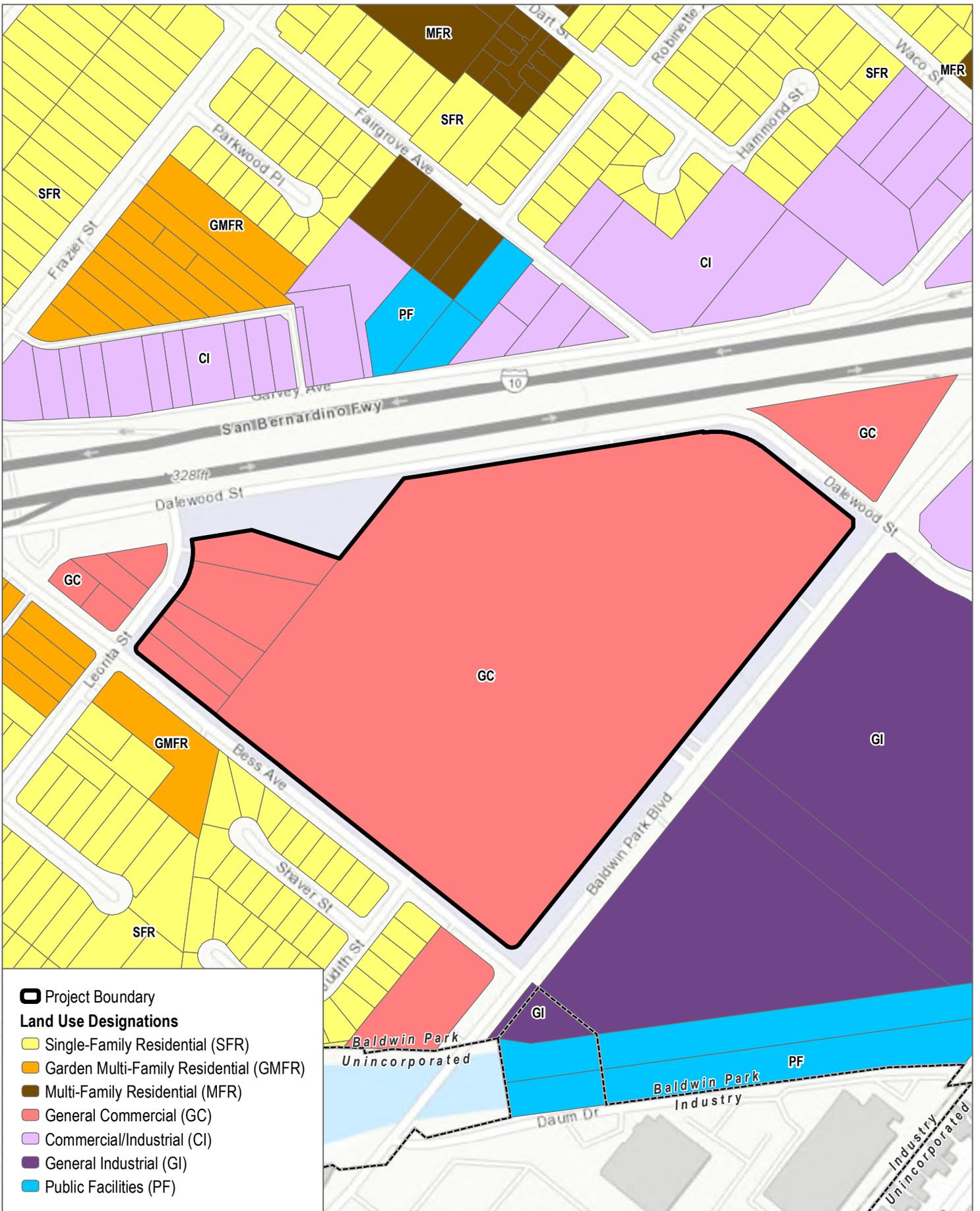


SOURCE: Bing Maps 2020; HMC Architects 2021

**FIGURE 3**

Off-site Improvements

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SOURCE: Esri 2022; Baldwin Park 2018

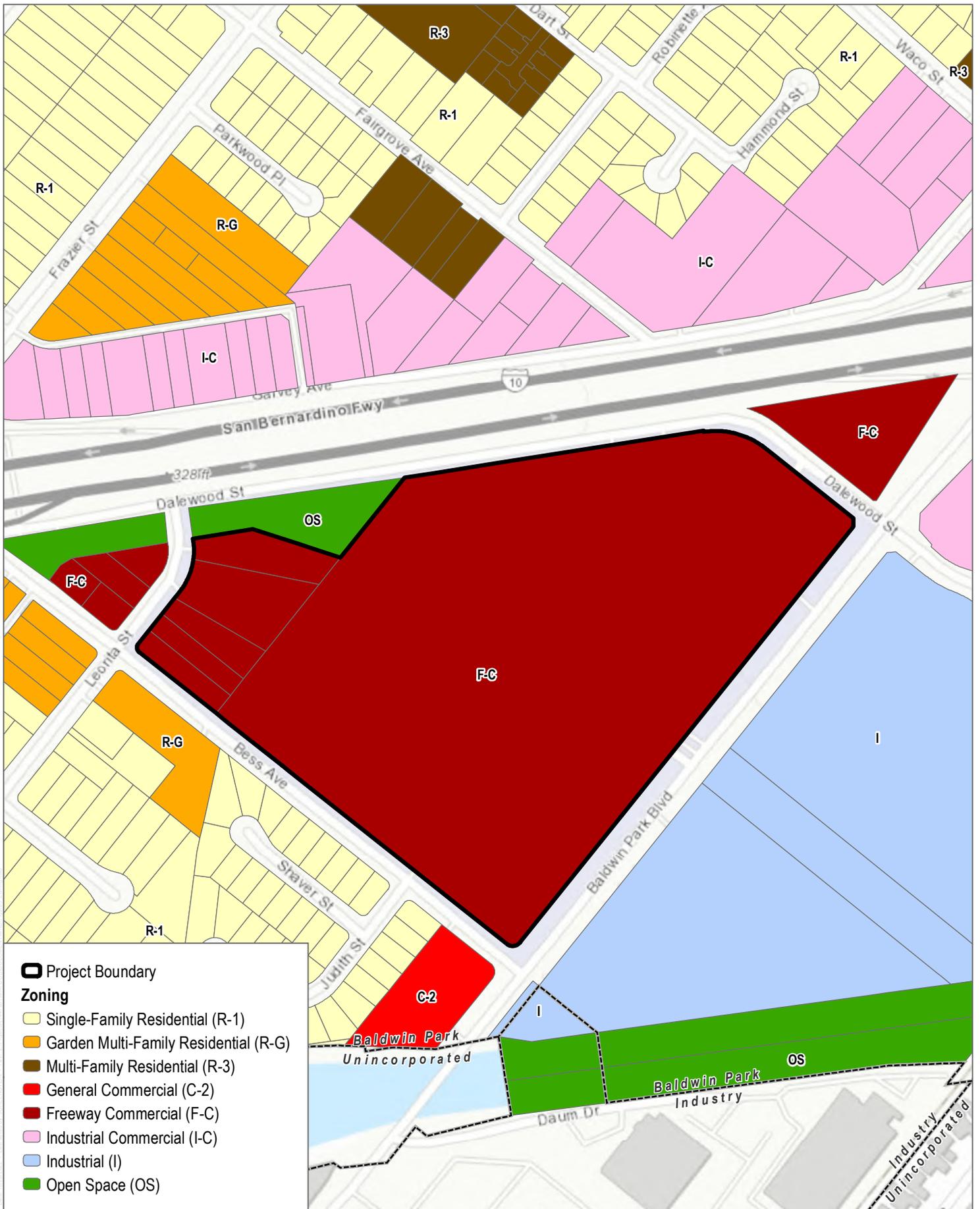


**FIGURE 4**

**Land Use Designation**

Kaiser Baldwin Park Emergency Department Expansion and Medical Office Building Project

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SOURCE: Esri 2022; Baldwin Park 2018

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SOURCE: Microsoft 2022; Sandpiper BESS LLC 2022

**FIGURE 6**  
 Noise Measurement Locations and Contours  
 Kaiser Baldwin Park Emergency Department Expansion and Medical Office Building Project