Public Review Draft Initial Study/ Mitigated Negative Declaration

1977 Saturn Data Center Project

October 2024

Lead Agency:

City of Monterey Park
320 West Newmark Avenue
Monterey Park, CA 91754
Beth Chow, AICP, Planning Manager
626.307.1315

Consultant:

Kimley-Horn and Associates, Inc.
660 South Figueroa Street, Suite 2050
Los Angeles, California 90017
Heidi Rous, CPP, Project Manager
213.261.4040

Kimley»Horn

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1.0 INTRODUCTION

1.1 Statutory Authority and Requirements

SDCF Monterey Park, LLC (the "Applicant") submitted an application for a data center project at 1977 Saturn Street, Monterey Park, CA to the City of Monterey Park Planning Division for discretionary review. The City of Monterey Park ("City"), as Lead Agency, determined that the proposed project is subject to the California Environmental Quality Act ("CEQA"), and that preparation of an initial study is required.

This initial study ("IS") evaluates the potential environmental effects that could result from the construction and operation of the proposed data center. This IS has been prepared in accordance with California Public Resources Code section 21000 et seq. ("CEQA") and Title 14 of the California Code of Regulations Section 15000, et. seq. ("CEQA Guidelines").

Based on the analysis provided within this IS, the City concluded that, with incorporation of the identified mitigation as agreed to by the Applicant, the proposed data center would not result in significant impacts on the environment and, therefore, that the preparation of a mitigated negative declaration ("MND") is intended as an informational document and is ultimately required to be adopted by the City's decision-making body before or concurrently with the proposed project.

1.2 Summary of Findings

Pursuant to CEQA Guidelines section 15367, the City, as Lead Agency, has the authority for environmental review and adoption of the environmental documentation, in accordance with CEQA. This IS and MND evaluated the environmental issues outlined in **Section 3.0: Environmental Factors Potentially Affected**. It provides decision-makers and the public with information concerning the proposed project's potential environmental effects and recommended mitigation measures, if any.

Based on this IS and MND, and supporting environmental analysis, the proposed project would have no impact or a less than significant impact concerning all environmental issue areas, except the following, for which the proposed project would have a less than significant impact with mitigation incorporated:

- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Tribal Cultural Resources

As set forth in CEQA Guidelines Section 15070, an initial study leading to a mitigated negative declaration can be prepared when the initial study identifies potentially significant effects, but project revisions would avoid or mitigate the effects to a point where clearly no significant effects would occur, and there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

1.3 Initial Study Public Review Process

The Notice of Intent to Adopt a Mitigated Negative Declaration ("NOI") was provided to the Clerk of the County of Los Angeles and mailed to responsible and trustee agencies concerned with the proposed project and other public agencies with jurisdiction by law over resources affected by the project. A 30-day public review period has been established for the IS/MND in accordance with CEQA Guidelines Section 15073. During the public review period, the IS/MND, including the Technical Appendices, was made available for review on the City website, at https://www.montereypark.ca.gov/241/Planning.

In reviewing the IS/MND, affected public agencies and the interested public should focus on the document's adequacy in identifying and analyzing the potential environmental impacts and the ways in which the Project's potentially significant effects can be avoided or mitigated.

Written comments on this IS/MND may be sent to:

Beth Chow, AICP, Planning Manager
City of Monterey Park, Planning Division
320 West Newmark Ave
Monterey Park, CA 91754
Email: bchow@MontereyPark.ca.gov

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised. If so, further documentation may be required. If not or if the issues raised do not provide substantial evidence that the Project would have a significant effect on the environment, the IS/MND will be considered for adoption and the Project for approval.

1.4 Incorporation by Reference

Pursuant to CEQA Guidelines Section 15150, an initial study and mitigated negative declaration may incorporate by reference all, or portions of, another document which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language is considered set forth in full as part of the initial study and mitigated negative declaration's text.

The references outlined below, which were utilized during preparation of the IS, are available for review on the City's website, at:

Monterey Park General Plan. The City adopted its comprehensive General Plan ("General Plan") in 2001. Since adopting the General Plan, the General Plan's Land Use and Urban Design Element was adopted through the Focused General Plan Update in June 2020, the Healthy Communities Element and Sustainable Communities Element were adopted in October 2014, the Safety Element and Environmental Justice Element were adopted in January 2022, and the 2021-2029 Housing Element (6th Cycle) was adopted in March 2023. The General Plan outlines the City's goals, plans, and objectives for land use within the City's jurisdiction.

Found at: https://www.montereypark.ca.gov/253/General-Plan

Monterey Park Municipal Code ("MPMC"). The MPMC, among other things, implements the General Plan and regulates land use and development within the City's jurisdiction. MPMC Title 21 is the primary tool for implementing the General Plan and coordinating and controlling the development and use of real property throughout the City. The MPMC is referenced throughout this IS/MND to establish the Project's baseline regulatory requirements.

Found at: https://ecode360.com/MO4971

1.5 Report Organization

This document is organized into the following sections:

Section 1.0: Introduction provides a project introduction and overview, cites the CEQA Guidelines to which the proposed project is subject, and summarizes the IS/MND's conclusions.

Section 2.0: Project Description details the Project's location, environmental setting, background and history, characteristics, discretionary actions, construction program, phasing, agreements, and required permits and approvals. This section also identifies the IS/MND's intended uses, including a list of anticipated permits and other approvals.

Section 3.0: Lead Agency Determination provides the determination of the proposed project and an overview of potential impacts that may or may not result from project implementation.

Section 4.0: Evaluation of Environmental Impacts provides an analysis of environmental impacts identified in the environmental checklist.

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2.0 PROJECT DESCRIPTION

2.1 Project Overview

The Applicant proposes to demolish the existing improvements on the real property located at 1977 Saturn Street, Monterey Park CA and construct a new data center with an ancillary equipment yard, substation, parking, and landscaping. The proposed data center would comprise a total of approximately 218,400 square feet that would include approximately 109,970 square feet of data hall space and approximately 91,889 square feet of support space (collectively, the "Project").

The data center building's support space would consist of office, loading docks, storage, mechanical/electrical/fiber entry rooms, and other ancillary uses. The proposed data center building would have an FAR of 0.32.

The preliminary design of the proposed data center building would be one story and 36 feet in height (46.5 feet to top of mechanical equipment platform screening). The proposed data center would house computer servers and supporting equipment for private clients. Clients would either use the Project as a place to relocate their existing servers or as a place to operate new servers and expand their server capacity. Power to run data center operations would be provided by Southern California Edison ("SCE") service, through a proposed on-site dedicated 24,000-square-foot electrical substation to be constructed on the northeastern portion of the site. To provide power during an interruption in SCE service, the Applicant would also install 14 stationary diesel-fueled internal combustion engines and generators ("gen-sets"). The 14 gen-sets, each capable of producing four megawatts ("MW"), would be used only in the event of an emergency. The maximum power demand to maintain full functionary of the data center is calculated to be approximately 49.9 MW, which could be produced by 12 of the gen-sets, allowing 2 gen-sets to be a redundant back-up. Twelve four MW backup generators with a total generation capacity of up to 48 MW and the two redundant back-up generators would be located outdoors in an approximately 75,000-square-foot ancillary equipment yard, adjacent to the north side of the data center. The ancillary equipment yard would be screened by a 20-foot tall perforated screen wall. Rooftop mechanical equipment would be required to provide interior temperature control and to cool computer servers. The substation would also include fire safety equipment.

Additional on-site improvements would include a trash enclosure, gated driveway access, parking lot, perimeter fencing, masonry wall on the northwestern portion of the site, retaining wall along the northeasterly and southwesterly site boundary on Orange Avenue and Saturn Street, respectively, and landscaping, as further described below.

2.2 Location

The Project is proposed on the real property located at 1977 Saturn Steet, Monterey Park CA (Assessor's Parcel Number ("APN") 5265-026-054) which is approximately 15.8 acres, and is located in the southeastern portion of the City, in Los Angeles County ("County"), approximately 7.5 miles east of downtown Los Angeles (the "Project Site"); see **Figures 2-1: Regional Vicinity**

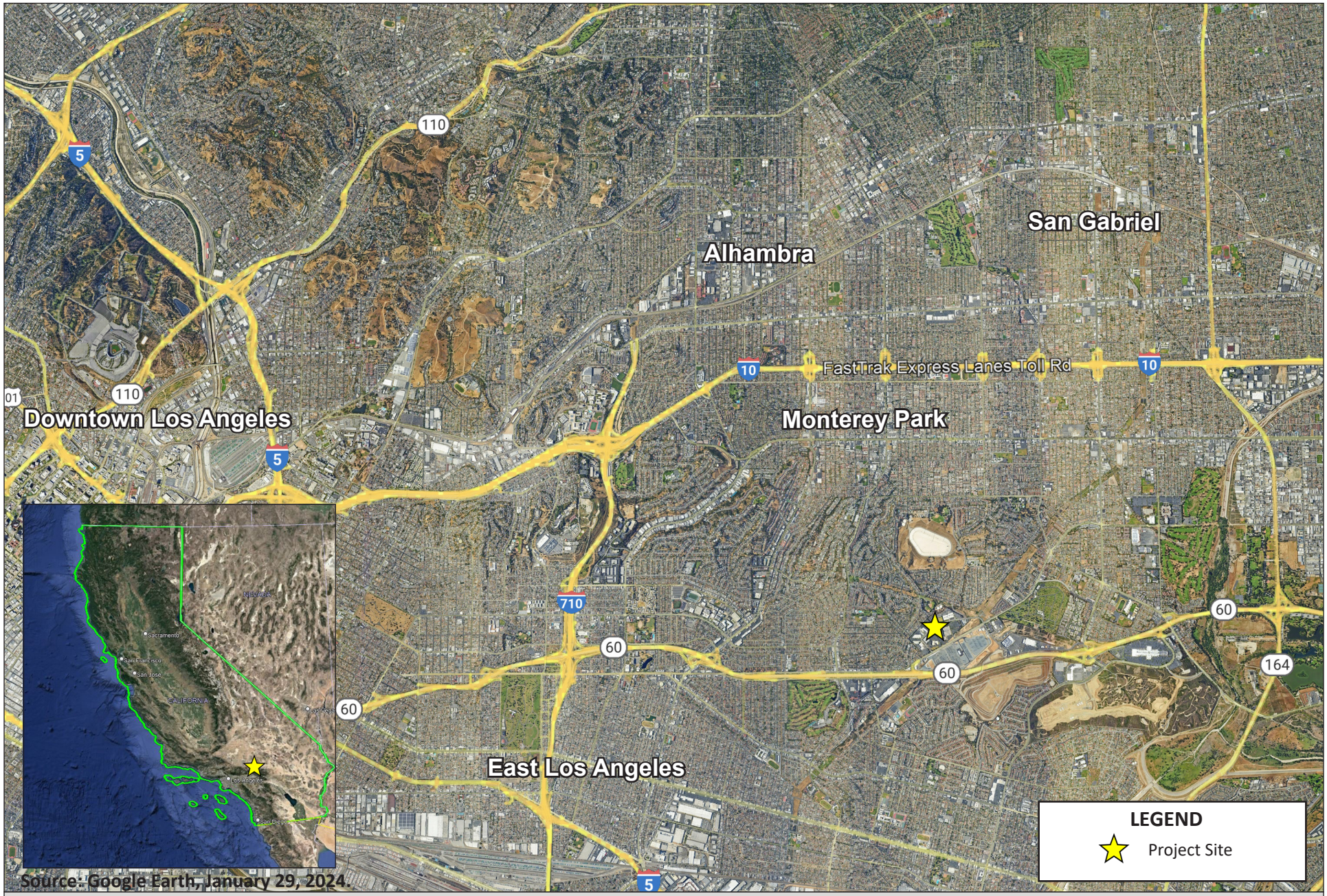
Map and **2-2: Local Vicinity Map**. Regional access to the Project Site is provided via State Route 60 ("SR 60"), Interstate 10 ("I-10"), State Route 164 ("SR 164"), and Interstate 710 ("I-710"), located approximately 0.4-mile south, 2.1 miles north, 2.8 miles east, 3.1 miles west of the Project Site, respectively.

2.3 Environmental Setting

2.3.1 On-Site Conditions

The majority of the Project Site is relatively flat, except for the northern boundary of the Project Site which moderately slopes up to a small hill that borders the northern boundary of the Project Site. Project Site elevations range from approximately 360 feet above mean sea level ("amsl") to approximately 420 amsl. As depicted in Figure 2-2, the Project Site is currently developed with a two-story commercial office building, an associated one-story utility building with a diesel-powered emergency backup generator, and surface parking lot. The existing buildings on-site were developed in 1979. The existing office commercial building was formerly occupied for use as a banking office and data center until 2016. Current on-site operations consist of routine general property management and maintenance. The commercial office building is approximately 205,628 square feet, and the utility building is approximately 3,936 square feet, resulting in a total existing building square footage of approximately 209,564 square feet. The Project Site also contains an asphalt-paved surface parking lot with 847 parking spaces and an existing perimeter security fence. Approximately 337 trees and landscaping are located along the western, northern, and eastern boundaries of the Project Site and throughout the parking lot. A grass area is also located adjacent to the western and southern sides of the commercial office building.

Access to the Project Site is provided via two driveways off Saturn Street, one each off the eastern and western boundaries of the Project Site. Pedestrian access is provided via an existing sidewalk along the portion of Saturn Street that abuts the southeastern portion of the existing commercial office building. The Project Site includes existing utility connections (water, sewer, and electrical).



Source: Google Earth, January 29, 2024.

FIGURE 2-1: REGIONAL VICINITY MAP

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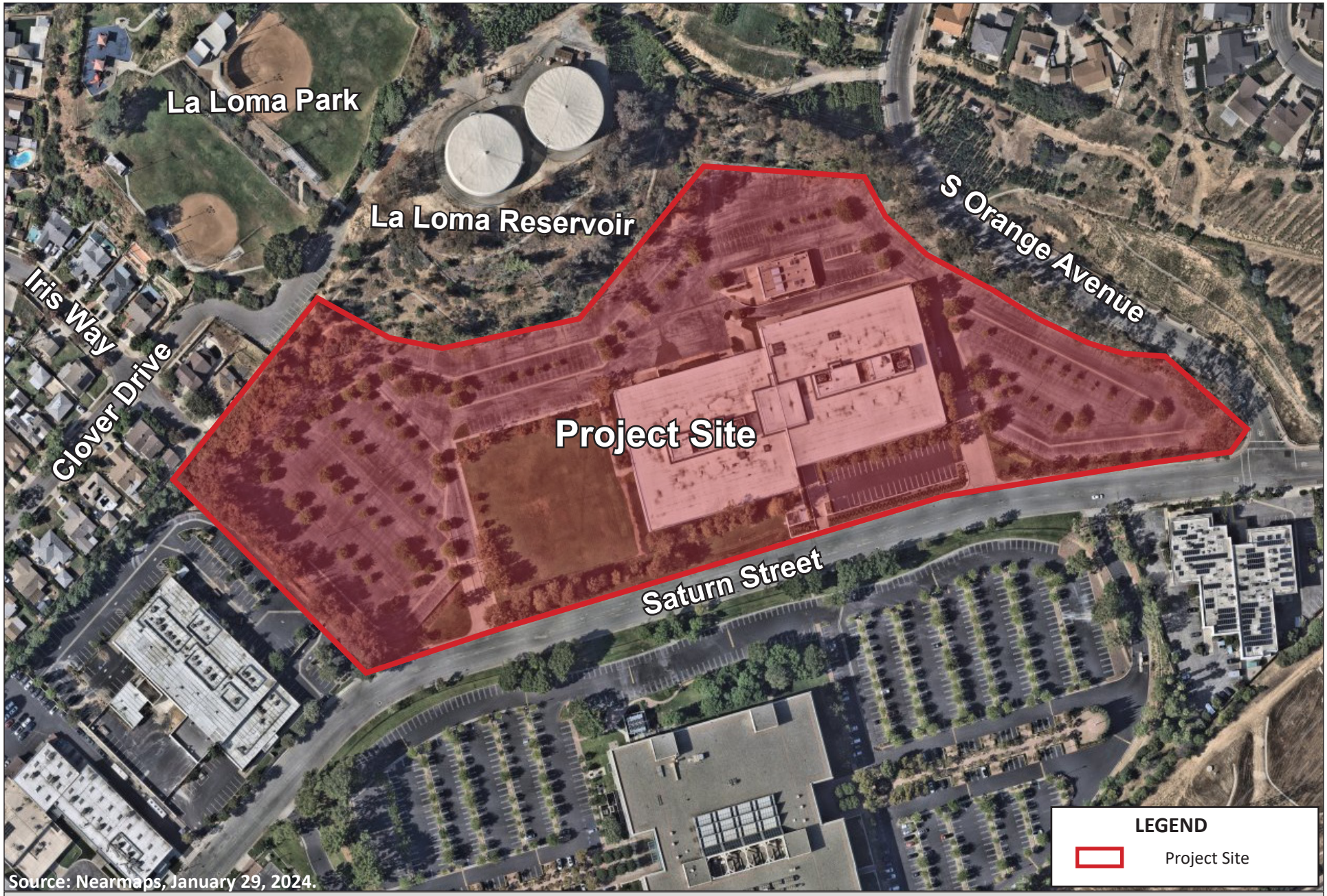

FIGURE 2-2: LOCAL VICINITY MAP
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2.3.2 General Plan And Zoning

The Project Site is within the McCaslin Business Park (O-P Voter Enacted) zone, and has a General Plan land use designation of Innovation/Technology. The primary uses allowed within this land use designation include research and development, light manufacturing, service commercial, professional offices, entertainment, and breweries/wineries/distilleries. Figure LU-4 in the General Plan's Land Use and Urban Design Element which identifies the Project Site within the Saturn Park Focus Area, which was developed to create new business opportunities within the district. The maximum allowable intensity in the Saturn Park Focus Area Innovation/Technology land use designation is 0.60 floor area ratio ("FAR") per Figure LU-4 in the Land Use Element with a maximum height of 40 feet, and identified as 0.80 FAR per MPMC Section 21.14.100.[1]

The Project Site is zoned Office Professional (Voter Enacted) (O-P). Pursuant to MPMC 21.14.040, principal permitted uses in this zone include data processing facilities. The O-P Zone is intended to provide for the development of integrated professional, office and limited retail areas that exhibit a diversity of business activity from both revenue and service quality standpoints, and which are compatible and responsive to abutting land uses, including residential developments.[2]

2.3.3 Surrounding Land Uses

On-site and surrounding land uses and zoning designations are summarized in **Table 2-1: On-site and Surrounding Land Uses** and depicted on Figure 2-2.

Table 2-1: On-site and Surrounding Land Uses

Description	Existing On-the-Ground[1]	Zoning[2]
Project Site	Commercial office building, parking lot	Office Professional (Voter Enacted) (O-P)
North	La Loma Reservoir water storage tanks, La Loma Park, plant nursery, single-family residential uses beyond	Open Space (O-S)
South	Saturn Street, commercial office buildings, surface parking lots, Southern California Edison (SCE) Mesa Substation	O-P
East	South Orange Avenue, open space	O-S, O-P
West	Commercial office buildings, single-family residential uses	O-P, Single-Family Residential (R-1)

1. Google Earth Pro, 2024.
2. City of Monterey Park, Zoning Map, 2021, https://www.montereypark.ca.gov/DocumentCenter/View/11735/Zoning-Map_030521.

[1] City of Monterey Park, Monterey Park 2040 General Plan, Land Use and Urban Design Element, 2019, https://www.montereypark.ca.gov/DocumentCenter/View/10181/MontereyParkLU_UDElement_FINAL_ADOPTED_12-6-2019-compressed. Accessed January 27, 2024.

[2] City of Monterey Park, Zoning Map, 2021, https://www.montereypark.ca.gov/DocumentCenter/View/11735/Zoning-Map_030521 . Accessed January 27, 2024.

2.4 Project Characteristics

See **Figure 2-3: Conceptual Site Plan** for a conceptual site plan depicting the various components of the Project.

2.4.1 Major Equipment

Table 2-2: Major Equipment provides a list of the major equipment that would be located on the Project Site as part of the Project.

Table 2-2: Major Equipment

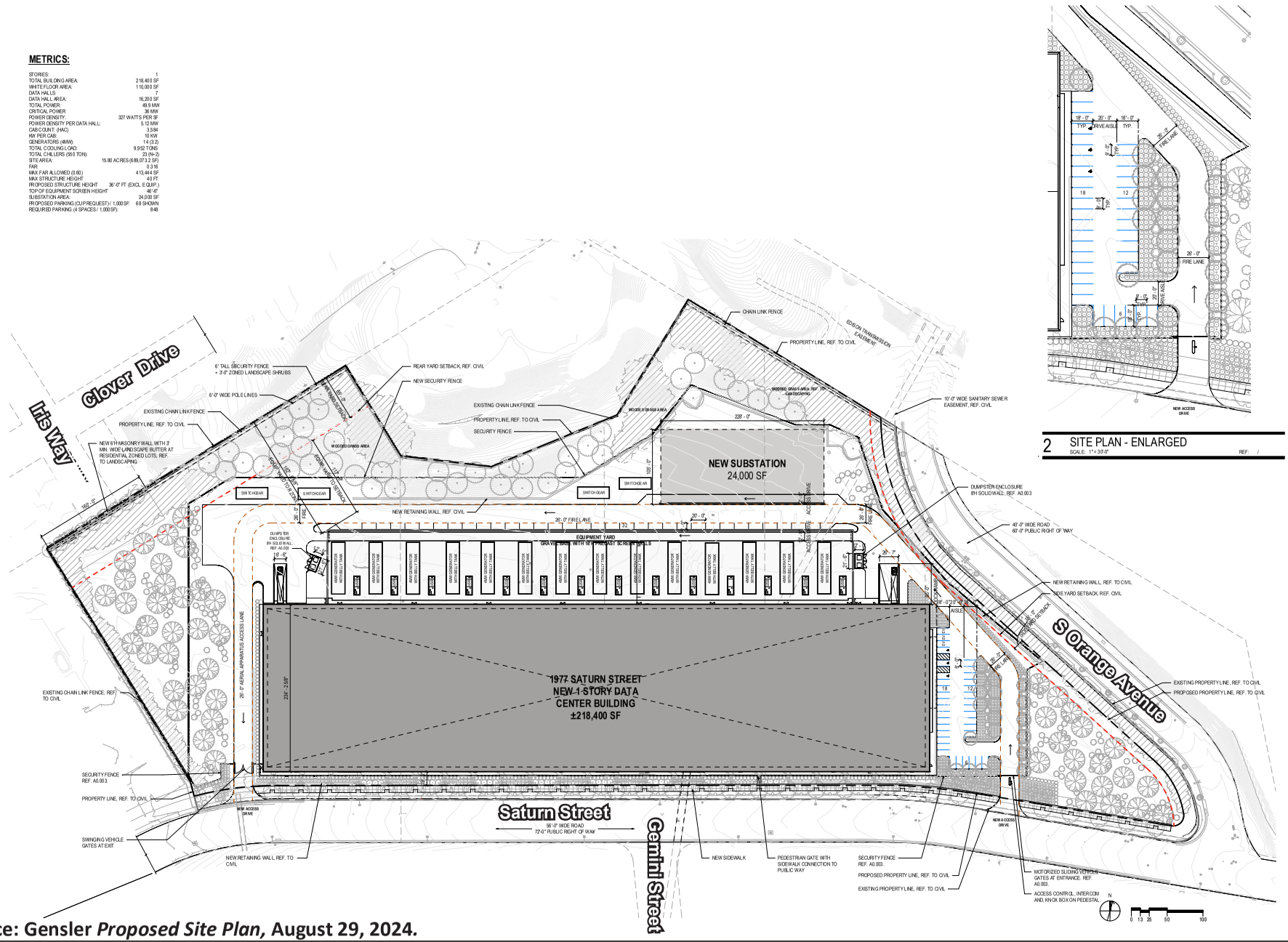
Equipment	Quantity	Location
4-MW standby generators	14	North of and adjacent to the data center
125-kW chillers	23	On the roof of the proposed building

2.4.2 Architectural Design

Exterior building elements and materials for the proposed data center would include metal panels, insulated precast concrete panels, aluminum-framed glass storefront with an aluminum canopy, aluminum-framed doors, and glazed windows. Rooftop equipment would be screened from view from the surrounding area by 16-foot-tall metal panel acoustic and visual screens, and the gen-sets in the equipment yard would be screened from view by an approximate 20-foot-tall perforated screen wall. Retaining walls would also enclose the loading yards, trash enclosure, and substation. The final architectural design of the proposed building is subject to review and approval by the City.

2.4.3 Access, Circulation, and Parking

The Project is required to provide 848 parking spaces per MPMC Table 21.22(c), Nonresidential Parking Standards, of Section 21.22.120, Minimum Parking Spaces Required. As further described in Section 2.6.3, Project Operations – Employees, below, up to 26 employees would typically work in the data center building throughout the day (daytime, evening, and overnight) every 24 hours. As the projected number of employees would require far fewer parking spaces than what is prescribed in the MPMC, the Project would provide for demand-based parking via a parking analysis reviewed by the City Engineer and City Planner to accommodate anticipated parking needs. Such parking needs would be incorporated into the development standards contained in the Business Recovery Development Agreement Zone ("BRDZ"). Accordingly, the Project would include 68 parking spaces adjacent to the eastern and northern sides of the proposed data center building, including three handicapped accessible spaces and three spaces for electric vehicles ("EV"). The Project would also include two loading dock berths to accommodate deliveries and loading activities for the proposed data center.



Source: Gensler *Proposed Site Plan*, August 29, 2024.

FIGURE 2-3: CONCEPTUAL SITE PLAN

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Vehicular access to the Project Site would be provided via two new gated driveways located along Saturn Street. One driveway is proposed to be located along the western perimeter of the Project Site, and the other driveway is proposed to be located along the eastern perimeter of the Project Site. These new driveways would be located closer to the western and eastern boundaries of the Project Site compared to the existing driveways. These two driveways would connect with each other along the northern side of the proposed equipment yard. The driveway along the eastern perimeter of the Project Site would serve as the main entry to the Project Site for passenger and service vehicles. Additionally, an internal, 26-foot-wide drive aisle would be included for general circulation and fire access. The designs and dimensions of the driveways would be designed to comply with the City's current design requirements.

Pedestrian access within the Project Site would also be provided via a walkway along the western, southern, and eastern sides of the data center. A pedestrian gate with sidewalk connection to the public right-of-way would be provided on Saturn Street west of the new eastern driveway.

2.4.4 Security and Fencing

The Project would include new security fencing enclosing the Project Site in addition to the existing perimeter fence. Two secured access gates would be provided, one for each proposed driveway. The access gates would remain locked, except during operations and maintenance activities. A pedestrian gate would also be located adjacent to the southern side of the proposed data center building that would provide access to the sidewalk along Saturn Street. The Project would also include security measures such as security lighting, a surveillance camera system, and 24/7 security personnel.

2.4.5 Landscaping

The Project would include landscaping on the western and eastern ends of the Project Site, along the western side of the proposed data center building, along the western and eastern sides of the proposed equipment yard, along the eastern side of the proposed substation, and throughout the proposed parking lot. A landscape buffer with a minimum width of three feet would also be provided along the northwestern boundary of the Project Site that abuts adjacent residential uses. Proposed landscaping would include native trees, shrubs, grasses, and groundcover, all of which would have very low or low water needs. The Project would plant 77 new trees throughout the Project Site, 21 of which would be street trees along the proposed sidewalk. Project development would include the removal of approximately 186 existing trees on-site. The Project would be equipped with a low flow irrigation system consisting of a weather-based smart controller and low rotors, bubbler, or drip systems. Proposed landscaping would be consistent with the surrounding buildings to comply with the City's design requirements.

2.4.6 Utilities and Infrastructure

Water

Potable water for the Project Site is provided by the San Gabriel Valley Municipal Water District. The City's Public Works Department Engineering Division owns and maintains all water

infrastructure, including on-site and off-site facilities. The existing public water lines would be removed and rerouted, subject to approval from the City of Monterey Park Public Works Department.

Four existing fire hydrants are located in the vicinity of the Project Site: one on Orange Avenue and three on Saturn Street. Approximately four new fire hydrants would be installed on-site. All fire and water design improvements must comply with applicable law, including, without limitation, the California Fire Code as adopted by the MPMC. The Project would include new internal fire water, domestic water, and irrigation water utility lines that would connect to the water main line within Saturn Street.

Wastewater

The Project Site falls within the service area of the A.K. Warren Water Resource Facility, which is owned and operated by the Los Angeles County Sanitation Districts ("LACSD"). The Project would connect to the existing sanitary sewer main line within Saturn Street. The existing 10-foot-sewer easement located on-site would be quitclaimed.

Drainage

Stormwater from the Project Site is collected on-site via catch basins and is routed through pipes that ultimately connect to the existing public catch basins/storm drain main line within Saturn Street. There are City-owned public catch basins directly in front of the existing commercial building and public catch basins near the Project Site's existing southerly driveway.

The Project's anticipated stormwater treatment design is comprised of two stormwater catchment systems. Each one consisting of a proprietary biofiltration unit and detention system that would be located on the northwestern and southeastern portions of the Project Site. A stormwater lift station would also be installed on the southeastern portion of the Project Site. New catch basins would be installed throughout the Project Site. New internal storm drain lines would be constructed and would connect to the existing storm drain main line within Saturn Street.

Solid Waste

Solid waste generated by the Project would be collected and hauled away by the City's solid waste franchisee (Athens Services). The Project would include solid waste enclosures on the northeastern and northwestern portion of the Project Site, which would be shielded from view by retaining walls.

Electricity and Natural Gas

SCE is responsible for providing electrical services to the Project Site. As discussed above, a new substation owned and operated by the Applicant will be constructed as part of the Project.

The Project would not include any natural gas usage during Project operations.

2.4.7 Site Grading

The Project Site is bordered on the north by hillside that would remain undisturbed where the proposed design permits, as a general guideline using the existing parking lot limits and the limit of grading. There is currently only one area where there is cut into the hillside to accommodate the future substation. The proposed data center building takes up majority of the buildable land on the Project Site and spans nearly the entire frontage of Saturn Street. In order to capture the potential rainwater on-site, high and low points were created along the drive aisle and parking areas to route the water to the proposed catch basins.

2.5 Project Construction

Project construction is anticipated to occur over one phase, lasting approximately 24 months, beginning as early as September 2025 and ending as early as August 2027. Construction would occur consistent with the MPMC, including, without limitation, the City's noise policies. Specifically, construction would occur Monday through Friday from 7:00 A.M. to 7:00 P.M. or Saturday, Sunday, and holidays between 8:00 A.M. to 6:00 P.M. Project construction is anticipated to occur in the following sequence:

- Demolition,
- Site grading and construction preparation,
- Building construction,
- Utility Work,
- Paving,
- Interior construction and build-out,
- Installation of equipment and infrastructure, and
- Final inspections, testing, and commissioning.

Project Site preparation for the Project would require cutting and removal of approximately 500,000 square feet of concrete and approximately 65,000 cubic yards of soil export. Final grading plans would be approved by the City, as applicable.

2.6 Project Operations

2.6.1 Backup Energy Supply

A data center relies upon a constant supply of power to allow servers to operate continuously: 24 hours per day, seven days per week. To ensure continuous energy supply, the Project would utilize up to 12 4-MW backup generators upon loss of grid power. The backup generators are designed to start up quickly and run only as demand requires. All generators would be located outdoors in the equipment yard and would be surrounded by an acoustic screen wall. Generators would be placed in sound-attenuating enclosures. The generators would be laid out in one row

and reach a height of approximately 20 feet to top of generator enclosure, and up to 40 feet to top of exhaust stack.

The gen-sets would have maintenance testing performed throughout the year to ensure performance when needed during a power failure. All generators would be operated strictly in accordance with permitted hours as determined by the South Coast Air Quality Management District ("SCAQMD").

Each generator would be provided with a 7,000-gallon sub-base fuel storage tank, equating to 24 hours of runtime in emergency conditions. The sub-base fuel storage tanks will be provisioned with fuel ports to allow refilling from the internal access road and fire access road on-site. Additionally, the Project would include uninterruptable power supplies ("UPS") and direct current ("DC") plant energy equipment/batteries for backup power. Batteries would provide enough energy to cover the critical load of 36 MW in the event of a power failure. UPS and batteries would be located in the data center, adjacent to the computer room the system serves.

2.6.2 Cooling

Servers convert electrical energy as they operate and need to be kept cool. Therefore, cooling systems are a critical component of data center operation. Cooling systems would be installed to remove heat, ensuring servers operate safely and efficiently. The heating, ventilation, and air conditioning ("HVAC") equipment would include 23 air cooled chillers with free cooling modules, each rated at 460-tons of capacity, in an N+1 redundancy configuration to support data hall operations. Packaged HVAC rooftop units would provide cooling for the administrative and ancillary spaces. A Water Usage Effectiveness (WUE) of 0.0 would be anticipated given the design leverages a closed loop cooling system.

2.6.3 Employees

It is anticipated that up to 26 employees would typically work in the data center building throughout the day (daytime, evening, and overnight) every 24 hours.

2.6.4 Vehicle Trips

Passenger vehicle trips to the Project Site would be minimal, consisting of employees traveling to the Project Site for work and occasional client visits. Truck trips would occur during Project operation to deliver and remove equipment as needed. Visitor and client trips to the Project Site are further analyzed in **Section 4.17**, **Transportation**, of this IS/MND.

2.6.5 Energy Usage

Major sources of energy demand for Project operations would be client servers and the cooling system. The facility would use a maximum of 49.9 MW for a maximum load of 1,197,160 kilowatt-hours ("kWh") daily. Overall, the daily power usage would vary depending on how many servers are running and how intensely the data center's clients are running their servers. The data center building would require minimal lighting, which would be used only to support the lobby, office space, corridors, storage space, and parking area.

2.7 Offsite Improvements for Southern California Edison ("SCE") Service

SCE prepared a Method of Service Study ("MOS") that verified SCE can provide power to the Project. The MOS identified the nearby Mesa Substation and the Newmark Substation as the sources of electricity for the Project. The electricity line routes from the Project to the substations, as well as the associated SCE infrastructure, are illustrated in **Figure 2-4: Offsite Improvements for Southern California Edison Service**. In addition, the MOS identified telecom transmission line routes from the Project to existing telecom infrastructure located at the Mesa Substation and along Potrero Grande Drive, as illustrated in **Figure 2-5: Transmission Telecom Improvements**. Per the MOS, preliminary review of the line routes assumes SCE will install its new facilities in franchise and/or within existing SCE right-of-way.

As noted in the MOS, the construction of the transmission lines would require a Permit To Construct ("PTC") from the California Public Utilities Commission ("CPUC"). The MOS concluded that construction of the transmission facilities would qualify for a PTC exemption when such construction activities are included in the environmental review of the Project for purposes of CEQA review. Accordingly, this IS/MND includes analysis of the SCE offsite improvements identified in the MOS for the Project.

The SCE improvements would include installation of new overheard and/or underground facilities that connect the SCE substations, and existing telecom infrastructure, to the Project. That construction would be minor and likely occur within public and SCE existing right-of-way, which will result in minimal disturbance of land and/or airspace. Per the MOS, the improvements would mostly occur on the Project Site (for a new substation) and be limited to new rack relays at the existing Mesa Substation and Newmark Substation. Those relay installations involve minor equipment upgrades at the existing SCE substations and would not require substantial construction that could significantly impact the environment.

In addition, per the MOS, the SCE improvements include the installation of seven to eight tubular steel poles and steel aluminum conductor for the 66 kilovolt ("kV") transmission line from the SCE substations, and existing powerline infrastructure, to the Project. Installation of that equipment would involve minor excavation to place the power poles, support footings, and installation of the related power transmission lines. For the telecom lines, the MOS indicates there will be primary and secondary telecom transmission lines running from the Mesa Substation to the Project. Construction of those underground lines would likely require excavation in the existing right-of-way along portions of Saturn Street, South Orange Avenue, and Potrero Grande Drive. The excavation would be limited to the area needed to install conduit for the telecom lines and a series of new manholes to access the telecom line.

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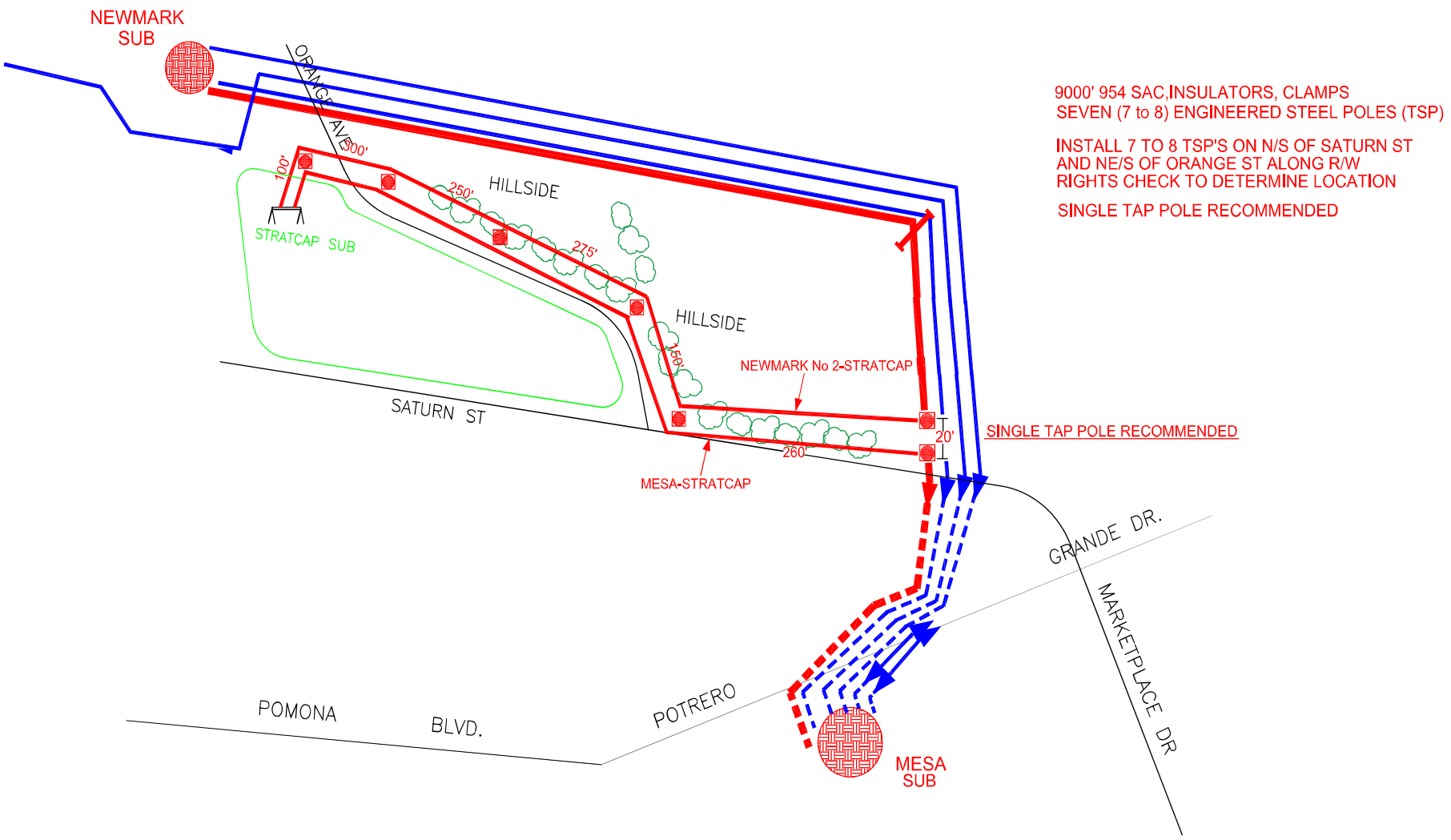

Source: Southern California Edison, 2024.

FIGURE 2-4: OFFSITE IMPROVEMENTS FOR SOUTHERN CALIFORNIA EDISION SERVICE

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Source: Southern California Edison, 2024.

FIGURE 2-5: TRANSMISSION TELECOM IMPROVEMENTS

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2.8 Agreements, Permits, and Approvals

The City has discretionary authority over the proposed Project. Other agencies, in addition to the City, are expected to use this IS/MND in their decision-making process. To implement this Project, several discretionary permits are required from the City and other agencies including, without limitation, at a minimum, the following discretionary permits/approvals must be granted by the City and others:

- Adoption of the Initial Study/Mitigated Negative Declaration;
- Approval of CUPs for a project on a lot size over one acre, and mechanical equipment exceeding height, if needed;
- Design Review;
- Approval of a Development Agreement, due to the Project's large scale development, and activation of the BRDZ pursuant to the MPMC;
- Tree removal;
- SCAQMD Authority to Construct/Permit to Operate; and
- Permits to Construct SCE Facilities.

2.9 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the Project, involving at least one impact that is a "Potentially Significant Impact" or “Less Than Significant With Mitigation Incorporated,” as indicated by the checklist on the following pages.

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

3.0 LEAD AGENCY DETERMINATION

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.	X
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 or a 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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.	

CITY OF MONTEREY PARK

Beth Chow
Beth Chow, AICP
Planning Manager

October 31, 2024
Date

4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

The following environmental analysis is patterned after CEQA Guidelines Appendix G**.** An explanation is provided for all responses except "No Impact" responses, which are supported by the cited information sources. The responses consider the whole action involved with the proposed Project: on- and off-site, Project- and cumulative-level, direct and indirect, and short-term construction and long-term operational. The explanation of each issue also identifies the significance criteria or threshold, if any, used to evaluate each question, and the mitigation identified, if any, to avoid or reduce the impact to less than significant. To each question, there are four possible responses:

- **No Impact.** The Project would not have any measurable environmental impact.
- **Less Than Significant Impact.** The Project would have the potential to impact the environment, although this impact would be below-established thresholds that are considered to be significant.
- **Less Than Significant With Mitigation Incorporated.** The Project would have the potential to generate impacts, which may be considered as a significant effect on the environment, although mitigation measures or changes to the Project's physical or operational characteristics could reduce these impacts to a less than significant level.
- **Potentially Significant Impact.** The Project could have impacts, which may be considered significant, and therefore additional analysis is required to identify mitigation. A determination that there is a potential for significant effects indicates the need to more fully analyze the Project's impacts and identify mitigation.

4.1 Aesthetics

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?				X
c) If in a non-urbanized area, 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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Impact Analysis

4.1a Would the project have a substantial adverse effect on a scenic vista?

No Impact. Under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly-valued landscape for the public's benefit. The Project Site is currently developed with a two-story commercial office building, surface parking lot, and a grass lot. The Project Site is within a fully developed area of the City dominated by single-family residences and office uses. Overall Project Site topography is mostly flat, except for the northern boundary of the Project Site, which moderately slopes up to the hill bordering the northern Project Site boundary. The City's General Plan does not designate any scenic vistas within the City. The closest scenic resource to the Project Site is the San Gabriel Mountains approximately 10 miles to the north. However, existing views of these mountains are entirely obscured from street view along Saturn Street by surrounding urban development, trees, and the hill bordering the northern Project Site boundary. There are no prominent topographical features on the Project Site from which scenic vistas could be viewed, nor does the Project Site contain a scenic vista.

Upon Project development, views of the San Gabriel Mountains would continue to be blocked along Saturn Street. The Project would not directly obstruct an existing public view of a scenic vista as no scenic vistas are in the Project Site vicinity. Therefore, Project development would not result in a substantial adverse effect on a scenic vista. There would be no impacts to scenic vistas, and no mitigation measures would be required.

4.1b Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?

No Impact. There are no State-designated scenic highways in the City.[3] The nearest eligible scenic highway is SR 39 located approximately 13 miles northeast of the Project Site, and the nearest officially designated scenic highway is the portion of SR 2 located within the Angeles National Forest, approximately 13 miles northwest of the Project Site. Therefore, the Project would not damage scenic resources within a State scenic highway. No impact would occur in this regard.

4.1c If in a non-urbanized area, 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 in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project Site is in an urbanized area of the City; therefore, the applicable threshold with respect to the Project is whether the Project is consistent with applicable zoning and other regulations governing scenic quality.

The Project Site is zoned Office Professional (Voter Enacted) (O-P). Pursuant to MPMC Chapter 21.14, O-P – Office Professional Zone (Voter Enacted), the O-P Zone is intended to provide for the development of integrated professional, office and limited retail areas that exhibit a diversity of business activity from both revenue and service quality standpoints, and which are compatible and responsive to abutting land uses, including residential developments. Data centers are a principally permitted use in the O-P Zone.

The Project Site has a General Plan land use designation of Innovation/Technology. The primary uses allowed within this land use designation include research and development, light manufacturing, service commercial, professional offices, entertainment, and breweries/wineries/distilleries. The Project proposes to develop a data center, which is a permitted use within the Innovation/Technology General Plan land use designation. Furthermore, the maximum FAR for the Innovation/Technology designation is 0.60 with a maximum height of 40 feet. The proposed FAR for the Project is 0.32, which is below the maximum permitted FAR. The Project would also have a maximum height of 36 feet (exclusive of the mechanical equipment platform screening), which is below the maximum permitted height. In addition, if needed, the MPMC permits the City to issue a CUP for height exceedances in the O-P Zone per MPMC Section 21.14.090.

The Project would be consistent with the zoning for the Project Site, including the land use, FAR, height, and setback requirements, standards, and limits established for the Project Site. With City approval of the requested actions to allow for a demand-based reduction in the number of parking spaces provided, the Project's provision of 68 parking spaces would be consistent with the MPMC. Therefore, impacts would be less than significant.

[3] California Department of Transportation, California State Scenic Highway System Map, 2019, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed on February 6, 2024.

4.1d Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. Existing outdoor lighting at and near the Project Site is associated with office and commercial parking, and street lighting along Saturn Street typical of urbanized areas. New light sources introduced by the Project may increase ambient nighttime illumination levels.

Construction

Pursuant to MPMC Section 4.50.100, Sound Level Limits—Exceptions, construction activities would occur Monday through Friday from 7:00 A.M. to 7:00 P.M. and/or Saturday, Sunday, and holidays from 8:00 A.M. to 6:00 P.M. While the majority of Project construction would occur during daylight hours, there is a potential that construction could require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. To the extent artificial light sources are required, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with MPMC light intensity requirements. Additionally, as part of the Project, construction lighting would be shielded to minimize light spillover. Construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing comprised of a solid material or including screening would be placed along the periphery of the Project Site to screen construction activity from view at the street view at off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with Project construction activities would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, impacts related to light and glare during construction would be less than significant.

Operation

The Project would introduce new sources of light and glare that are typically associated with data center buildings, including architecture, interior, security, and wayfinding lighting sources. In addition, the Project is replacing an existing commercial building on the Project Site, which has existing and similar sources of site lighting. Also, all Project lighting would comply with current energy standards and codes, while providing efficient and effective on-site lighting. Nighttime security lighting for the Project would be provided to illuminate building entrances, parking areas, and internal roadways and walkways. The nearest sensitive receptors in the vicinity of the Project

Site are the single-family residences along Clover Drive to the west. However, all exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses and security lighting would be designed to prevent light trespass onto adjacent properties. It is not anticipated that the amount of light emanating from the Project would represent a noticeable increase over current light levels.

The Project would include appropriate levels of interior and exterior lighting for security, parking, and architectural highlighting. Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the Project in accordance with MPMC lighting regulations that require that operational lighting would be directed downward or on the specific on-site feature to be lit and avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses.

Regarding glare, daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Similar to the existing development at the Project Site, sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project Site currently contains a surface parking lot and an existing office building constructed of various non-reflective materials. No sources of substantial glare are anticipated with implementation of the Project. Exterior building materials of the proposed data center would use various non-reflective material designed to minimize the transmission of glare from the Project's buildings and would not include polished metals. The Project building would be prohibited from using highly reflective building materials such as mirrored glass on exterior facades. Parking would be screened from street-level public view by proposed landscaping and trees along Saturn Street, thereby reducing potential nighttime glare from vehicles.

Based on the above, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant.

4.2 Agricultural and Forestry Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. 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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

Impact Analysis

4.2a 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?

4.2b Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

4.2c 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))?

4.2d Would the project result in the loss of forest land or conversion of forest land to non-forest use?

4.2e 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?

No Impact. According to the California Department of Conservation's California Important Farmland Finder, no Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance is mapped within or in the immediate vicinity of the Project Site.[4] Further, there is no land under a Williamson Act Contract in the City.[5] Therefore, the Project would not conflict with any existing Williamson Act Contract. Additionally, the Project Site is zoned Office Professional (Voter Enacted) (O-P). No agricultural, forest land, or timberland zoning exists in the City.[6] Therefore, no impact concerning mapped farmlands, Williamson Act contracts, or agricultural, forest, or timber land zoning would occur.

[4] California Department of Conservation (DOC), California Important Farmland Finder, 2022, https://maps.conservation.ca.gov/dlrp/ciff/. Accessed on February 5, 2024.

[5] DOC, California Williamson Act Enrollment Finder, 2022, https://maps.conservation.ca.gov/dlrp/WilliamsonAct/. Accessed on February 5, 2024.

[6] City of Monterey Park, Zoning Map, 2021, https://www.montereypark.ca.gov/DocumentCenter/View/11735/Zoning-Map_030521.

4.3 Air Quality

This Section is based on the *Air Quality Analysis Memorandum* (Kimley-Horn, August 2024), *Office Improvements for Southern California Edison Service* (Kimley-Horn, September 2024), and *Health Risk Assessment Memorandum* (Kimley-Horn, October 2024), which are included as **Appendix A-1: Air Quality Analysis Memorandum, Appendix A-2: Offsite Improvements for Southern California Edison Service,** and **Appendix B: Health Risk Assessment Memorandum,** respectively.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			X	
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?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Regulatory Setting

Federal

Federal Clean Air Act

Air quality is federally protected by the Federal Clean Air Act ("FCAA") and its amendments. Under the FCAA, the United States Environmental Protection Agency ("U.S. EPA") developed the primary and secondary National Ambient Air Quality Standards ("NAAQS") for the criteria air pollutants including ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide ("CO"), sulfur dioxide (SO_2), particulate matter up to 10 microns (PM10), particulate matter up to 2.5 microns ("PM2.5"), and lead. Proposed projects in or near nonattainment areas could be subject to more stringent air-permitting requirements. The FCAA requires each State to prepare a State Implementation Plan ("SIP") to demonstrate how it will attain the NAAQS within the federally imposed deadlines.

The U.S. EPA can withhold certain transportation funds from states that fail to comply with the planning requirements of the FCAA. If a State fails to correct these planning deficiencies within two years of Federal notification, the U.S. EPA is required to develop a Federal implementation plan for the identified nonattainment area or areas. The provisions of 40 Code of Federal Regulations Parts 51 and 93 apply in all nonattainment and maintenance areas for

transportation-related criteria pollutants for which the area is designated nonattainment or has a maintenance plan. The U.S. EPA has designated enforcement of air pollution control regulations to the individual states. Applicable NAAQSs are summarized in **Table 4.3-1: State and National Ambient Air Quality Standards.**

Table 4.3-1: State and National Ambient Air Quality Standards

Pollutant	Averaging Time	State Standards[1]	National Standards[2]
Ozone (O_3) [2, 5, 7]	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm
	1 Hour	0.09 ppm (180 µg/m^3)	NA
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)
	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)
Nitrogen Dioxide (NO_2)	1 Hour	0.18 ppm (339 µg/m^3)	0.10 ppm[11]
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)
Sulfur Dioxide (SO_2) [8]	24 Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)
	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)
	Annual Arithmetic Mean	NA	0.03 ppm (80 µg/m^3)
Particulate Matter (PM10) [1, 3, 6]	24-Hour	50 µg/m^3	150 µg/m^3
	Annual Arithmetic Mean	20 µg/m^3	NA
Fine Particulate Matter (PM2.5) [3, 4, 6, 9]	24-Hour	NA	35 µg/m^3
	Annual Arithmetic Mean	12 µg/m^3	9.0 µg/m^3
Sulfates (SO_{4-2})	24 Hour	25 µg/m^3	NA
Lead (Pb) [10, 11]	30-Day Average	1.5 µg/m^3	NA
	Calendar Quarter	NA	1.5 µg/m^3
	Rolling 3-Month Average	NA	0.15 µg/m^3
Hydrogen Sulfide (H_2S)	1 Hour	0.03 ppm (0.15 µg/m^3)	NA
Vinyl Chloride (C_2H_3Cl) [10]	24 Hour	0.01 ppm (26 µg/m^3)	NA

ppm = parts per million; µg/m^3 = micrograms per cubic meter; mg/m^3 = milligrams per cubic meter; NA = no information available.

1. California standards for O_3, CO (except Lake Tahoe), SO_2 (1-hour and 24-hour), NO_2, suspended particulate matter - PM10, and visibility reducing particles are values that are not to be exceeded. The standards for sulfates, Lake Tahoe CO, lead, H_2S, and vinyl chloride are not to be equaled or exceeded. If the standard is for a 1-hour, 8-hour or 24-hour average (i.e., all standards except for lead and the PM10 annual standard), then some measurements may be excluded. Measurements are excluded that CARB determines would occur less than once per year on the average. The Lake Tahoe carbon monoxide standard is 6.0 ppm, a level one-half the national standard and two-thirds the State standard.
2. National standards shown are the "primary standards" designed to protect public health. National standards other than for O_3, particulates and those based on annual averages are not to be exceeded more than once a year. The 1-hour O_3 standard is attained if, during the most recent three-year period, the average number of days per year with maximum hourly concentrations above the standard is equal to or less than one. The 8-hour O_3 standard is attained when the 3-year average of the 4th highest daily concentrations is 0.070 ppm or less. The 24-hour PM10 standard is attained when the 3-

Table 4.3-1: State and National Ambient Air Quality Standards

year average of the 99th percentile of monitored concentrations is less than 150 µg/m_3. The 24-hour PM2.5 standard is attained when the 3-year average of 98th percentiles is less than 35 µg/m^3.

3. Except for the national particulate standards, annual standards are met if the annual average falls below the standard at every site. The national annual particulate standard for PM10 is met if the 3-year average falls below the standard at every site. The annual PM2.5 standard is met if the 3-year average of annual averages spatially-averaged across officially designed clusters of sites falls below the standard.
4. NAAQS are set by the U.S. EPA at levels determined to be protective of public health with an adequate margin of safety.
5. On October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm. An area will meet the standard if the fourth-highest maximum daily 8-hour O_3 concentration per year, averaged over three years, is equal to or less than 0.070 ppm. U.S. EPA will make recommendations on attainment designations by October 1, 2016, and issue final designations October 1, 2017. Nonattainment areas will have until 2020 to late 2037 to meet the health standard, with attainment dates varying based on the O_3 level in the area.
6. The national 1-hour O_3 standard was revoked by the U.S. EPA on June 15, 2005.
7. In June 2002, CARB established new annual standards for PM2.5 and PM10.
8. The 8-hour California O_3 standard was approved by the CARB on April 28, 2005 and became effective on May 17, 2006.
9. On June 2, 2010, the U.S. EPA established a new 1-hour SO_2 standard, effective August 23, 2010, which is based on the 3-year average of the annual 99th percentile of 1-hour daily maximum concentrations. The existing 0.030 ppm annual and 0.14 ppm 24-hour SO_2 NAAQS however must continue to be used until one year following U.S. EPA initial designations of the new 1-hour SO_2 NAAQS.
10. In December 2012, U.S. EPA strengthened the annual PM2.5 NAAQS from 15.0 to 12.0 µg/m^3. In December 2014, the U.S. EPA issued final area designations for the 2012 primary annual PM2.5 NAAQS. Areas designated "unclassifiable/attainment" must continue to take steps to prevent their air quality from deteriorating to unhealthy levels. The effective date of this standard is April 15, 2015.
11. CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure below which there are no adverse health effects determined.
12. National lead standard, rolling 3-month average: final rule signed October 15, 2008. Final designations effective December 31, 2011.

Source: South Coast Air Quality Management District, Air Quality Management Plan, 2022; California Air Resources Board, Ambient Air Quality Standards, May 6, 2016, and U.S. EPA, NAAQS Table, February 7, 2024.

State

California Air Resources Board

CARB administers the air quality policy in California. The California Ambient Air Quality Standards ("CAAQS") were established in 1969 pursuant to the Mulford-Carrell Act. The CAAQS, included with the NAAQS in **Table 4.3-1**, are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility reducing particulates, hydrogen sulfide, and sulfates.

The California Clean Air Act ("CCAA"), which was approved in 1988, requires that each local air district prepare and maintain an Air Quality Management Plan ("AQMP") to achieve compliance with CAAQS. These AQMPs also serve as the basis for the preparation of the SIP for meeting NAAQS for the State of California. Like the U.S. EPA, CARB also designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a CAAQS for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events such as wildfires, volcanoes, etc. are not considered violations of a CAAQS, and are not used as a basis for designating areas as nonattainment. The applicable CAAQS are summarized in **Table 4.3-1**.

Regional

South Coast Air Quality Management District ("SCAQMD")

Regionally, air quality is governed by the SCAQMD, the air pollution control agency for Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAQMD's primary responsibility is ensuring that California Ambient Air Quality Standards ("CAAQS") and NAAQS are attained and maintained in the South Coast Air Basin ("SoCAB"). The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities.

The SCAQMD is also the lead agency in charge of developing the Air Quality Management Plan ("AQMP"), with input from the Southern California Association of Governments ("SCAG") and the CARB. The AQMP is a comprehensive plan that includes control strategies for stationary and area sources, as well as for some on-road and off-road mobile sources. SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. Under federal law, SCAG is designated as a Metropolitan Planning Organization and under State law as a Regional Transportation Planning Agency and a Council of Governments. SCAG has the primary responsibility for providing future growth projections and the development and implementation of transportation control measures. CARB, in coordination with federal agencies, provides the control element for mobile sources.

The 2016 AQMP was adopted by the SCAQMD Governing Board on March 3, 2017. The purpose of the AQMP is to set forth a comprehensive and integrated program that would lead the SoCAB into compliance with the federal 24-hour PM2.5 air quality standard, and to provide an update to the SCAQMD's commitments towards meeting the 8-hour O_3 NAAQS. Specifically, the 2016 AQMP covers the following NAAQS: 1979 1-hour O_3 NAAQS, 1997 8-hour O_3 NAAQS, 2006 24-hour PM2.5 NAAQS, 2008 8-hour O_3 NAAQS, and the 2012 annual PM2.5 NAAQS.

The 2022 AQMP, adopted by the SCAQMD Governing Board on December 2, 2022, was developed to address the requirements for meeting the 2015 8-hour O_3 standard. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulations, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_X technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other FCAA measures to achieve the 2015 8-hour O_3 standard. An AQMP is a regional and multi-agency effort including the SCAQMD, the CARB, the SCAG, and the U.S. EPA. The 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* ("RTP/SCS"), entitled Connect SoCal 2024 RTP/SCS (referred to as "Connect SoCal") and updated emission inventory methodologies for

various source categories. Connect SoCal was approved by SCAG regional council on April 4, 2024, however CARB must formally approve the plan.

The SCAQMD has published the CEQA Air Quality Handbook (approved by the SCAQMD Governing Board in 1993 and augmented with guidance for Localized Significance Thresholds [LSTs] in 2008). The SCAQMD guidance helps local government agencies and consultants to develop environmental documents required by CEQA and provides identification of suggested thresholds of significance for criteria pollutants for both construction and operation (see discussion of thresholds below). With the help of the CEQA Air Quality Handbook and associated guidance, local land use planners and consultants are able to analyze and document how proposed and existing projects affect air quality in order to meet the requirements of the CEQA review process. The SCAQMD periodically provides supplemental guidance and updates to the handbook on their website.

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. Under federal law, SCAG is designated as a Metropolitan Planning Organization and under State law as a Regional Transportation Planning Agency and a Council of Governments.

The State and federal attainment status designations for the SoCAB are summarized in **Table 4.3-2: South Coast Air Basin Attainment Status**. The SoCAB is currently designated as a nonattainment area for the O_3, PM10, and PM2.5 CAAQS, as well as the 8-hour O_3 and PM2.5 NAAQS. The SoCAB is designated as attainment or unclassified for the remaining CAAQS and NAAQS.

Table 4.3-2: South Coast Air Basin Attainment Status

Pollutant	State	Federal
Ozone (O_3) (1 Hour Standard)	Non-Attainment	Non-Attainment (Extreme)
Ozone (O_3) (8 Hour Standard)	Non-Attainment	Non-Attainment (Extreme)
Particulate Matter (PM2.5) (24 Hour Standard)	–	Non-Attainment (Serious)
Particulate Matter (PM2.5) (Annual Standard)	Non-Attainment	Non-Attainment (Serious)
Particulate Matter (PM10) (24 Hour Standard)	Non-Attainment	Attainment (Maintenance)
Particulate Matter (PM10) (Annual Standard)	Non-Attainment	–
Carbon Monoxide (CO) (1 Hour Standard)	Attainment	Attainment (Maintenance)
Carbon Monoxide (CO) (8 Hour Standard)	Attainment	Attainment (Maintenance)
Nitrogen Dioxide (NO_2) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment (Maintenance)

Table 4.3-2: South Coast Air Basin Attainment Status		
Pollutant	**State**	**Federal**
(Annual Standard)		
Sulfur Dioxide (SO_2) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide (SO_2) (24 Hour Standard)	Attainment	–
Lead (Pb) (30 Day Standard)	–	Unclassifiable/Attainment
Lead (Pb) (3 Month Standard)	Attainment	–
Sulfates (SO_{4-2}) (24 Hour Standard)	Attainment	–
Hydrogen Sulfide (H_2S) (1 Hour Standard)	Unclassified	–
Source: SCAQMD, Air Quality Management Plan, 2022; U.S. EPA, Nonattainment Areas for Criteria Pollutants (Green Book), 2022.		

The following is a list of SCAQMD rules that are required of construction activities associated with the Project:

- **Rule 402 (Nuisance)** – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM10 suppression techniques are summarized below.

  a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.

  b) All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.

  c) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.

  d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.

  e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.

- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.

- **Rule 1401 (New Source Review of Toxic Air Contaminants)** – This rule establishes limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index ("HI") from new permit units, relocations, or modifications to existing permit units which emit applicable toxic air contaminants. DPM is a substance listed in Table 1 of the Rule.[7] Therefore, the requirements to allow the construction and use of the new generators are as follows:

    - **MICR and Cancer Burden:** The cumulative increase in MICR which is the sum of the calculated MICR values for all toxic air contaminants emitted from the new, relocated or modified permit unit will not result in any of the following:

        - an increased MICR greater than one in one million (1.0×10^{-6}) at any receptor location, if the permit unit is constructed without TBACT;

        - an increased MICR greater than ten in one million (10×10^{-6}) at any receptor location, if the permit unit is constructed with T-BACT;

        - a cancer burden greater than 0.5.

    - **Chronic Hazard Index:** The cumulative increase in total chronic HI for any target organ system due to total emissions from the new, relocated or modified permit unit owned or operated by the applicant for which applications were deemed complete on or after the date when the risk value for the compound is finalized by the state Office of Environmental Health Hazard Assessment ("OEHHA") will not exceed 1.0 at any receptor location.

    - **Acute Hazard Index:** The cumulative increase in total acute HI for any target organ system due to total emissions from the new, relocated or modified permit unit owned or operated by the applicant for which applications were deemed complete on or after the date when the risk value for the compound is finalized by OEHHA will not exceed 1.0 at any receptor location.

- **Rule 1402 (Control of Toxic Air Contaminants From Existing Sources)** – This rule reduces the health risk associated with emissions of TACs from existing sources by specifying notification risk levels, action risk levels, and significant risk levels for MICR, cancer burden, and non-cancer acute and chronic HI applicable to total facility emissions. The rule establishes requirements to implement Risk Reduction Plans to achieve specified risk limits, as required by the Hot Spots Act and this rule.

[7] SCAQMD, Rule 1401, page 1401-17, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf?sfvrsn=4. Accessed April 22, 2024.

- **Rule 1403 (Asbestos Emissions From Demolition/Renovation Activities)** – This rule applies to owners and operators of any demolition or renovation activity, and the associated disturbance of asbestos-containing material (ACM), any asbestos storage facility, or any active waste disposal site. This rule includes requirements for activities, handling and clean-up procedures, storage, disposal and landfill requirements.
- **Rule 1415 (Reduction of Refrigerant Emissions from Stationary Air Conditioning Systems)** – The purpose of this rule is to reduce emissions of high-global warming potential refrigerants from stationary air conditioning systems by requiring project's to reclaim, recover, or recycle refrigerant and minimize leakage.
- **Rule 1466 (Control Of Particulate Emissions from Soils With Toxic Air Contaminants)** – This rule applies to projects with earth-moving activities of soil with applicable toxic air contaminants ("TACs") that have been identified as contaminants of concern at a site.
- **Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines)** – This rule applies to stationary compression ignition ("CI") engine greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

Local

City of Monterey Park General Plan

The City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City's General Plan has multiple elements that contain the following policies specific to air quality regarding the Project:

Land Use and Urban Design Element

Goal 4: A built environment that is resilient and promotes health and wellness.

Policy 4.5 New Development: Ensure new development is planned in areas that can sustain it long-term considering air quality, health indicators of residents, infrastructure networks and services, and socio-economic factors.

Resources Element

Goal 5: Improve air quality for future generations of Monterey Park residents.

Policy 5.8 Integrate air quality planning with land use and transportation planning.

Environmental Justice Element

Goal 2: Community health and the reduction of exposure to environmental pollutants is

a priority and part of all planning and policy practices.

Policy 2.1 Limit exposure to environmental pollution through good planning and the public process.

Background

SCAQMD Thresholds

Mass Emissions Thresholds

The significance criteria established by SCAQMD may be relied upon to make the above determinations. According to the SCAQMD, an air quality impact is considered significant if a Project would violate an ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established numeric thresholds of significance for air pollutants resulting from construction and operational activities of land use development projects, as shown in **Table 4.3-3: South Coast Air Quality Management District Emissions Thresholds**.

Table 4.3-3: South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors (Regional)	Mass Daily Thresholds (pounds per day)	
	Construction	Operations
Reactive Organic Gases (ROG)[1]	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM10)	150	150
Fine Particulates (PM2.5)	55	55

1. VOCs and ROGs are subsets of organic gases that are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. Although they represent slightly different subsets of organic gases, they are used interchangeably for the purposes of this analysis.

Source: SCAQMD, SCAQMD Air Quality Significance Thresholds, April 2019.

Localized Carbon Monoxide

In addition to the daily thresholds listed above, development associated with the Project would also be subject to the CAAQS and NAAQS. These are addressed though an analysis of localized CO impacts. The significance of localized impacts depends on whether ambient CO levels near the Project are above CO CAAQS and NAAQS (the more stringent CAAQS are 20 ppm for 1-hour and 9 ppm for 8-hour). The SoCAB has been designated as attainment of the 1-hour and 8-hour CAAQS.

Localized Significance Thresholds

The SCAQMD developed Localized Significance Thresholds ("LST") for emissions of NO_2, CO, PM10, and PM2.5 generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project without expecting to cause or substantially contribute to an exceedance of the most stringent state or federal ambient air quality standards. LSTs are based on the ambient

concentrations of that pollutant within the Project source receptor area ("SRA"), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is applicable for projects that disturb 5 acres or less on a single day. The City of Monterey Park is located within SCAQMD SRA 11 (South Coastal Los Angeles County). The nearest sensitive receptors are located approximately 65 feet from the Project Site (approximately 20 meters). LST thresholds are provided for source-receptor distances of 25, 50, 100, 200, and 500 meters. According to SCAQMD's *Localized Significance Threshold Methodology*, the closest receptor distance on the mass rate LST look-up tables is 25 meters. It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.[8] Therefore, LSTs for 25 meters were utilized in this analysis. LSTs associated with the 25-meter threshold are provided in **Table 4.3-4: Localized Significance Thresholds for Construction/Operations** to demonstrate that the emissions thresholds increase as acreages increase.

Table 4.3-4: Local Significance Thresholds (Construction/Operations)

Project Size	Maximum Pounds per Day							
	Construction				Operations			
	NO_x	CO	PM10	PM2.5	NO_x	CO	PM10	PM2.5
1 Acre	83	673	5	4	83	673	1	1
2 Acres	121	1,031	7	5	121	1,031	2	2
5 Acres	183	1,814	14	9	183	1,814	4	2

Note: Based on a receptor distance of 25 meters in SRA 11.
Source: SCAQMD, Localized Significance Threshold Methodology, July 2008.

Health Risk Analysis Thresholds

Project health risks are determined by examining the types and levels of air toxics generated and the associated impacts on factors that affect air quality. While the final determination of significance thresholds is within the purview of the lead agency pursuant to the CEQA Guidelines, the SCAQMD recommends that the following air pollution thresholds be used by lead agencies in determining whether the impacts from the Project are significant. If the lead agency finds that the Project has the potential to exceed the applicable thresholds, the Project should be considered significant. The thresholds for air toxic emissions are as follows.

- **Cancer Risk (Individual):** Emit contaminants result in a maximum individual incremental cancer risk equal or greater than of 10 in one million.
- **Cancer Burden:** Emit contaminants that exceeds the cancer burden of 0.5 excess cancer cases (in areas that equal or exceed one in one million).
- **Non-Cancer Risk:** Emit contaminants that result in a chronic or acute hazard index (HI) equal to or greater than 1.0.

Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incidence rate of 10 persons per million as the maximum acceptable incremental increase in cancer risk due to TAC exposure. This threshold is an upper-bound

[8] SCAQMD, Localized Significance Threshold Methodology, July 2008, https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf. Accessed April 22, 2024.

incremental probability to determine whether or not a given project has a potentially significant development-specific and cumulative impact and to ensure an individual new source does not contribute a cumulatively significant impact. The 10 in one million standard is a health-protective significance threshold. A risk level of 10 in one million implies a likelihood that up to 10 persons, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. This risk would be an excess cancer that is in addition to any cancer risk borne by a person not exposed to these air toxics.

Sensitive Receptors

SCAQMD defines sensitive receptors as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and the chronically ill are likely to be located. These facilities may include residences, school playgrounds, child-care centers, retirement homes, convalescent homes, and people with illnesses.

Construction TAC and PM Health Risks

TACs are airborne substances that can cause short-term (acute) or long-term (chronic or carcinogenic, i.e., cancer causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.

Construction equipment and associated heavy-duty truck traffic generate diesel exhaust, which is a known TAC. Diesel exhaust from construction equipment operating at the site poses a health risk to nearby sensitive receptors.

Under the SCAQMD Air Quality Guidelines, an incremental cancer risk of greater than 10 cases per million for a 70-year exposure duration at the Maximally Exposed Individual (MEI) will result in a significant impact. The 10 in 1 million threshold is based on the latest scientific data, and is designed to protect the most sensitive individuals in the population as each chemical's exposure level includes large margins of safety. In addition to this carcinogen threshold, the California Office of Environmental Health Hazard Assessment (OEHHA) recommends that the non-carcinogenic hazards for TACs at ground level should not exceed a chronic HI of greater than one.

Methodology

The Project's construction and operational emissions were calculated using the California Emissions Estimator Model version 2022.1.1.21 ("CalEEMod"). Details of the modeling assumptions and emission factors are provided in **Appendix A-1**. For construction, CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. Per the Transportation Analysis prepared for the Project, the Project is anticipated to generate approximately 52 daily vehicle trips. The modeling assumed "general office building" as the land use subtype because it was the most applicable as

data center is not an available subtype in the model. The "general office building" was chosen as a data center has similar building structure to an office building with primarily large open rooms with high ceilings and many individual smaller spaces for tenants. However, the electricity, natural gas, indoor and outdoor water, and daily trips were changed from default to information provided by the Applicant to more accurately represent the Project characteristics and associated air quality emissions. Pursuant to information provided in **Appendix E**, the Peak Power Demand Estimate Memorandum, the Project would require approximately 438 gigawatt hours ("GwH") per year of electricity and approximately 12 million gallons of water for indoor and outdoor water usage. No natural gas is proposed for the building.

Impact Analysis

4.3a Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. As part of its enforcement responsibilities, the U.S. EPA requires that each state with nonattainment areas prepare and submit a SIP that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the NAAQS and CAAQS. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the SoCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the FCAA, to reduce emissions of criteria pollutants for which the SoCAB is in nonattainment. To reduce such emissions, the SCAQMD adopted the 2016 AQMP and recently approved the 2022 AQMP (collectively, the "AQMPs"). The AQMPs establish a program of rules and regulations directed at reducing air pollutant emissions and achieving California's and national air quality standards. Because CARB approval of the 2022 AQMP may be reached during the expected Project entitlement period, this analysis compares the Project to both of the SCAQMD's AQMPs.

Criteria for determining project consistency with the AQMP are defined by the following indicators:

- **Consistency Criterion No. 1**: The Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2**: The Project will not exceed the assumptions in the AQMP or increments based on the years of the Project build-out phase.

According to the SCAQMD's *CEQA Air Quality Handbook*, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air

quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and NAAQS.

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As discussed in Response 4.3b below, the Project would not exceed construction or operational emissions standards. Therefore, the Project would not contribute to an existing air quality violation, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Thus, the Project is consistent with the first criterion.

Concerning Consistency Criterion No. 2, the AQMPs contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. As discussed in the City's General Plan, the Project Site is within the Innovation/Technology land use designation. According to the Land Use and Urban Design Element of the General Plan, the primary uses allowed within this land use designation include research and development, light manufacturing, service commercial, professional offices, entertainment, and breweries/wineries. The Project proposes to develop a data center, which is a permitted use within the Innovation/Technology land use designation. The Project Site is zoned Office Professional (Voter Enacted) (O-P). Pursuant to MPMC Chapter 21.14, O-P – Office Professional Zone (Voter Enacted), the O-P Zone is intended to provide for the development of integrated professional, office and limited retail areas that exhibit a diversity of business activity from both revenue and service quality standpoints, and which are compatible and responsive to abutting land uses, including residential developments. As discussed in **Section 4.11: Land Use and Planning**, below, the Project would be consistent with the zoning for the Project Site, including the land use, FAR, height, and setback requirements, standards, and limits established in the MPMC for the O-P Zone. The Project is consistent with the land use designation and development density presented in the City's General Plan, and therefore would not exceed the population or job growth projections used by the SCAQMD to develop the AQMPs. Thus, the Project is consistent with the second criterion.

Based on these criteria, the Project would not conflict with or obstruct implementation of the AQMPs and impacts would be less than significant.

4.3b 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?

Less Than Significant Impact. As shown in **Table 4.3-2** above, the SoCAB is classified as non-attainment of the applicable NAAQS and or CAAQS for O_3 (precursor pollutants ROG and NO_X), PM10, PM2.5, and lead (for the Los Angeles County portion only, and is expected to be redesignated to attainment based on recent monitoring[9]). The SoCAB is classified as attainment, maintenance, or unclassifiable for all other criteria pollutants. Nonetheless, the analysis below discloses emissions and applicable thresholds for O_3 precursors, NO_2, PM10, PM2.5, CO, and SO_2.

[9] SCAQMD, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=23. Accessed April 21, 2024.

Emissions of lead, hydrogen sulfide, sulfates, and vinyl chloride are not reported, because they would be minimal from the construction and operation of a data center.

Construction

Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the amount of pollutants generated exceeds the SCAQMD's thresholds of significance. Sources of emissions during construction include site grading, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water. Sensitive land uses surrounding the Project Site consist mostly of residential communities located adjacent to the Project Site, including single-family residences to the north and west of the Project Site.

Construction-generated emissions associated with the Project were calculated using the CARB approved CalEEMod, which is designed to model emissions for land use development projects, based on typical construction requirements. See **Appendix A-1** and **Appendix A-2** for more information regarding the construction assumptions used in this analysis. Predicted maximum daily construction-generated emissions for the Project are identified in **Table 4.3-5: Project Construction Emissions**. The modeling emissions include truck idling time and emissions from heavy-duty diesel equipment.

Table 4.3-5: Project Construction Emissions

Calendar Year	Emissions (pounds per day)[1]					
	ROG	NO_X	CO	SO_2	PM10	PM2.5
2025	3.38	52.2	32.4	0.22	9.57	4.02
2026	1.39	11.6	17.9	0.03	1.35	0.69
2027	1.12	6.72	11.3	0.02	1.53	0.49
2027 (Offsite Improvements)[2]	3.88	26.73	27.05	0.10	0.99	0.91
SCAQMD Threshold	75	100	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

1. Emissions were calculated using the CalEEMod version 2022.1.1.22, as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported. See **Appendix A-1** and **Appendix A-2** for model outputs.
2. Offsite improvement emissions were calculated using CalEEMod Appendix G, Table G-12. See **Appendix A-2** for model outputs.

The Project is subject to SCAQMD Rules 402, 403, and 1113, which prohibit nuisances, require dust mitigation, and limit VOC content in paints, respectively. It has been assumed that these rules will be followed using watering the site and low VOC paints during construction. In addition, the Project would follow Rule 1403 to limit asbestos emissions from building demolition. The Project may be required to comply with Rule 1466, *Control of Particulate Emissions from Soils with Toxic Air Contaminants.* The results of the emissions modeling, as summarized on **Table 4.3-5**, show that construction criteria pollutant emissions would remain below the applicable

thresholds, and construction impacts on short-term regional air quality would be less than significant.

Operations

The primary purpose of the data center is to house computer servers for data processing. Operational sources of emissions include mobile sources (i.e., motor vehicle use for employee commuting) and area sources (such as the use of landscape maintenance equipment, consumer products, and architectural coatings). In addition, the proposed Project would include up to 12 4-MW stationary emergency diesel generators that would only be used if there was a loss of grid power; and occasionally for periodic maintenance and testing.

Table 4.3-6: Project Operational Emissions summarizes the operational emissions attributable to the Project.

Table 4.3-6: Project Operational Emissions

Source	Emissions (pounds per day)[1]					
	ROG	NO_X	CO	SO_2	PM10	PM2.5
Area	7.54	0.09	10.5	<0.005	0.02	0.01
Energy[2]	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	0.18	0.16	1.88	<0.005	0.46	0.12
Total	**7.72**	**0.25**	**12.38**	**0.01**	**0.48**	**0.13**
SCAQMD Threshold	55	55	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

1. Emissions were calculated using the CalEEMod version 2022.1.1.22, as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.
2. Criteria pollutant emissions from energy sources are calculated in CalEEMod from only natural gas use. The Project would not use natural gas.

As shown in **Table 4.3-6,** the Project's regional operational emissions would not exceed applicable SCAQMD thresholds, and operational impacts on long-term regional air quality would be less than significant.

The loss of electrical power from the grid is a hypothetical scenario. The Project Site is located in close proximity to a major SCE substation and construction activities include the installation of new and reliable power transmission facilities from the existing substation to the Project. In addition, SCE has confirmed sufficient power load and facilities to reliably service the Project. Hence, future power loss scenarios that could trigger the need for temporary use of the back-up generators are speculative, and therefore do not require further analysis herein.

Furthermore, the periodic testing and maintenance of the generators would be limited under the terms of SCAQMD operating permits to be obtained by the Applicant. Thus, the temporary emissions from the generators during testing and maintenance would be regulated by SCAQMD to ensure adherence to applicable thresholds and permit limits set by the regulating agency. As part of the regulatory compliance process, the Applicant will obtain Permits to Operate (PTO) from the SCAQMD before installation or operation of the emergency generators, which verifies that the generators meet the applicable Best Available Control Technology (BACT) requirements and comply with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal

Combustion and Other Compression Ignition Engines) and Rule 1401 (New Source Review of Toxic Air Contaminants). Thus, the facility would not result in a violation of the ambient air standards or result in exposure to TAC emissions in excess of thresholds.

Overall, during construction and operation, the Project would not 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.

4.3c Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Localized Construction Significance Analysis

The nearest sensitive receptors to the Project Site are multi-family residences located approximately 65 feet (approximately 20 meters) northwest of the Project Site. To assess potential impacts to nearby sensitive receptors, the SCAQMD established Localized Significance Thresholds (LSTs). LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) to assist lead agencies in analyzing project-specific localized impacts. The SCAQMD established LSTs for certain pollutants with localized effects, specifically NO_X, CO, PM10, and PM2.5.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, **Table 4.3-7: Equipment-Specific Grading Rates** is used to determine the maximum daily disturbed acreage for comparison to LSTs. A conversion from equipment number to the maximum daily disturbed acreage is calculated. The appropriate source receptor area (SRA) for the localized significance thresholds is the South San Gabriel Valley (SRA 11) area since this area includes the Project site. LSTs apply to CO, NO_2, PM10, and PM2.5. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. Project construction is anticipated to disturb approximately 2.5 acres in a single day. As the LST guidance provides thresholds for projects disturbing 1-, 2-, and 5-acres in size and the thresholds increase with the size of the site, the LSTs for a 2.5-acre threshold were utilized for this analysis.

Table 4.3-7: Equipment-Specific Grading Rates

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Grading	Tractor	3	0.5	8	1.5
	Graders	1	0.5	8	0.5
	Dozers	1	0.5	8	0.5
Total Acres Graded Per Day					**2.5**

Source: CalEEMod version 2022.1.1.22.

As stated in the SCAQMD's *Finalized Localized Significance Threshold Methodology,* "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs."

Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptors are the residences located approximately 65 feet (approximately 20 meters) northwest to the north of the Project site. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, LSTs for 25 meters were utilized in this analysis. As discussed in Background on LST above, the closest receptor distance on the mass rate LST look-up tables is 25 meters. It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.[10] **Table 4.3-8: Localized Significance of Construction Emissions**, shows the results of localized emissions during construction activity. This table represents the worse-case scenario and are based on peak earthwork volumes anticipated. As shown in **Table 4.3-8,** localized Project construction emissions would not exceed SCAQMD thresholds, and impacts would be less than significant.

Table 4.3-8: Localized Significance of Construction Emissions

Source/Activity	Emissions (pounds per day)[1]			
	NO_X	CO	PM10	PM2.5
Construction Emissions[2]				
Phase 1 – Demolition (2025)	22.2	19.9	3.9	1.3
Phase 1 – Site Preparation (2025)	31.6	30.2	6.5	3.9
Phase 1 – Grading (2025)	16.3	17.9	2.6	1.6
Phase 1 – Building Construction and Utilities (2026)	9.85	13.0	0.38	0.35
Phase 1 – Paving (2026)	7.12	9.94	0.32	0.29
Phase 2 – Interior Construction (2026)	5.27	6.78	0.19	0.18
Phase 2 – Interior Construction (2027)	5.03	6.75	0.17	0.15
Phase 2 – Architectural Coating (2027)	0.83	1.13	0.02	0.02
Maximum Daily Emissions	*31.6*	*30.2*	*6.5*	*3.9*
SCAQMD Localized Screening Threshold (2.5 acres of disturbance at 25 meters)	131	1,162	8	6
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

1. Maximum emissions may not add up exactly due rounding in the modeling calculations. Detailed emissions calculations are provided in **Appendix A-1**.
2. SCAQMD Rule 403 Fugitive Dust applied for construction emissions. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment.

Source: CalEEMod version 2022.1.1.22. Refer to **Appendix A-1** for model outputs.

Localized Operational Impacts

According to the SCAQMD localized significance threshold methodology, operational LSTs apply to on-site sources. LSTs for receptors located at approximately 25 meters for SRA 11 were utilized

[10] SCAQMD, Localized Significance Threshold Methodology, July 2008, https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf. Accessed April 22, 2024.

in this analysis. Although the Project Site is 15.8 acres, the 5-acre LST threshold was conservatively used because a smaller size LST threshold is more conservative. Therefore, the 5-acre LSTs is a conservative evaluation of a 15.8 acre site.

The on-site operational emissions were calculated using CalEEMod and are compared to the LSTs in **Table 4.3-9: Localized Significance of Operational Emissions**. The operational emissions shown in **Table 4.3-9** include on-site Project-related sources as discussed above. As shown in **Table 4.3-9**, the Project would not generate localized emissions during Project operations. Therefore, the Project would result in a less than significant impact concerning LSTs during operational activities.

Table 4.3-9: Localized Significance of Operational Emissions

Source/Activity	Emissions (pounds per day)[1]			
	NO_X	CO	PM10	PM2.5
Operational Emissions				
On-Site Emissions (Area + Energy Sources)	7.54	10.5	0.02	0.01
SCAQMD Localized Screening Threshold (5-acre site at 25 meters)	131	1,162	2	2
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

1. Emissions were calculated using the California Emissions Estimator Model version 2022.1.1.20 (CalEEMod), as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.

Source: CalEEMod version 2022.1.1.22. Refer to **Appendix A-1** for model outputs.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] Cal.5th, Case No. S219783).

The Project would generate certain air pollutants during construction and operation. The criteria pollutants would include ROG/VOC, NO_X, CO, SO_2, PM10, and PM2.5 that can have adverse impacts on human health at certain levels of exposure. Here, the Project does not result in any significant air quality impacts, or create levels of exposure that would have significant effects on human health. All impacts are less than significant based on quantitative air quality modeling. Moreover, the state of environmental science modeling at this time is not capable of identifying precisely how pollutant concentrations from individual projects correlate directly or indirectly to the level of human health impacts.[11] It should also be noted that the Project emissions are well below the applicable air emission thresholds of significance, which are created by the air districts, in part, to evaluate the potential impacts of criteria pollutants on human health.

The SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the SoCAB) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR)

[11] Air Quality and Health Effects, Sierra Club v County of Fresno, White Paper, October 2019.

Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program[12] was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based NAAQS. The NAAQS establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's LSTs and mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts.

As previously discussed, localized effects of on-site Project emissions on nearby receptors were found to be less than significant (refer to **Table 4.3-8** and **Table 4.3-9**). The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable State or federal ambient air quality standard. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The CAAQS and NAAQS establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations. Information on health impacts related to exposure to ozone and particulate matter emissions published by the U.S. EPA and CARB have been summarized above and discussed in the Regulatory Setting section. As shown above, Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the CAAQS or NAAQS or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels in excess of the health-based CAAQS or NAAQS.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service of an intersection resulting from the Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard.

The SoCAB was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP. The 2003 AQMP is the most recent version that addresses CO concentrations. As part of the SCAQMD *CO Hotspot Analysis*, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic ("ADT") volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm Federal standard. The Project considered herein would not produce the volume of traffic

[12] Code of Federal Regulation (CFR) [i.e., PSD (40 CFR 52.21, 40 CFR 51.166, 40 CFR 51.165 (b)), Non-attainment NSR (40 CFR 52.24, 40 CFR 51.165, 40 CFR part 51, Appendix S).

required to generate a CO hot spot in the context of SCAQMD's *CO Hotspot Analysis*. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any vicinity intersections as the Project would result in 52 daily trips.[13] Therefore, impacts would be less than significant.

Carcinogenic Risk

Construction-related activities would result in Project-generated emissions of diesel particulate matter ("DPM") from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); paving; application of architectural coatings; on-road truck travel; and other miscellaneous activities. For construction activity, DPM from the exhaust of off-road, heavy-duty diesel equipment is the primary toxic air contaminant of concern. On-road diesel-powered haul trucks traveling to and from the construction area to deliver materials and equipment are less of a concern because they would not stay on the site for long durations. As such, the diesel exhaust from construction equipment operating at the site could potentially pose a health risk to nearby sensitive receptors.

Table 4.3-10: Construction Carcinogenic Risk Assessment shows the health risk for the construction of the Project. The analysis calculates risk based on exposure to construction concentrations during the entire two years of construction.

Table 4.3-10: Construction Carcinogenic Risk Assessment

Exposure Scenario	Cancer Risk (Risk per Million)[1]	Significance Threshold (Risk per Million)	Exceeds Significance Threshold?
Residential Receptors	2.49	10	No
Worker Receptor	0.11	10	No

1. The reported annual pollutant concentration is at the closest maximally exposed individual resident (MEIR) to the Project Site.

Source: Refer to **Appendix B**.

As shown in **Table 4.3-10**, the construction risk at the residential and worker receptors would be 2.49 in one million and 0.11 in one million, respectively. The incremental cancer risk would be less than those levels for receptors at distances further from the site. As such, the maximum cancer risk would be far below the SCAQMD threshold of 10 per million, and impacts associated with carcinogenic risk would therefore be less than significant.

Table 4.3-11: Population Construction Cancer Burden shows the population cancer burden for the construction of the Project.

Table 4.3-11: Population Construction Cancer Burden

Burden	Significance Threshold	Exceeds Significance Threshold?
0.0002	0.5	No

Source: Refer to **Appendix B**.

[13] Kimley-Horn and Associates, Inc., Transportation Analysis and Vehicle Miles Traveled Screening, April 5, 2024.

According to OEHHA, cancer burden, defined as the number of increased cancer cases expected in a population of one million, is used to assess public health impacts on a larger scale. Emissions of Project-generated DPM disperses, and concentration dissipates, rapidly with distance from the Project Site boundary. The residential receptors in Figure 1 of **Appendix B** are closest to the Project Site and would be the maximum receptor locations during construction.

In addition, Figure 2 of **Appendix B** provides a zone of impact screening isopleth that illustrates where total excess lifetime cancer risk exposure could be greater than 1 in 1,000,000, which is the screening criteria per OEHHA and SCAQMD for further analysis of the total cancer burden.

To be clear, this isopleth is highly conservative because it identifies the zone of potential impact over a 70-year lifetime exposure, and the Project construction duration is only approximately two years. Nonetheless, this report quantitatively analyzed the cancer burden within the zone of impact. As shown in Figure 2, the cancer burden for all receptors within the isopleth outline is well below the applicable SCAQMD threshold.

Quantitatively, the total cancer burden is the product of the number of persons in a residential population area and the estimated individual risk. As shown in Table 4.3-11, total cancer burden would be 0.0002, which is far below the SCAQMD's 0.5 cancer burden threshold. In addition, this modeled exposure scenario is temporary and ceases upon construction completion. Therefore, community-wide exposure to TACs from the Project would not result in a cancer burden of 0.5 or greater, and impacts would be less than significant.

Accordingly, the Project would not expose sensitive receptors to substantial pollutant concentrations.

Non-Carcinogenic Hazard

The significance thresholds for TAC exposure also require an evaluation of non-cancer risk stated in terms of a hazard index. Non-cancer chronic impacts are calculated by dividing the annual average concentration by the REL for that substance. The REL is defined as the concentration at which no adverse non-cancer health effects are anticipated. RELs are designed to protect sensitive individuals within the population. According to OEHHA, the REL for DPM is 5 and the target organ is the respiratory system.[14]

Chronic non-carcinogenic impacts are shown in **Table 4.3-12: Construction Chronic Hazard Assessment**. A chronic HI of 1.0 is considered individually significant. The hazard index is calculated by dividing the chronic exposure by the reference exposure level. The chronic hazard was calculated based on the highest annual average concentration at the maximally exposed individual receptor. It should be noted that there is no acute REL for DPM and acute health risk cannot be calculated. The highest maximum chronic hazard index associated with DPM emissions from Project construction would be 0.0030 and 0.0021 at the residential and worker receptors,

[14] California Office of Environmental Health Hazard Assessment, OEHHA Acute, 8-hour and Chronic Reference Exposure Level (REL) Summary, https://oehha.ca.gov/air/general-info/oehha-acute-8-hour-and-chronic-reference-exposure-level-rel-summary. Accessed March 26, 2024.

respectively. Therefore, construction non-carcinogenic hazard would be far below, and not exceed the acceptable limits of 1.0 and impacts would be considered less than significant.

Table 4.3-12: Construction Chronic Hazard Assessment

Exposure Scenario	Annual Concentration (µg/m^3)[1]	Chronic Hazard
Residential Receptors	0.0150	0.0030
Worker Receptors	0.0150	0.0021
SCAQMD Threshold	*N/A*	*1.0*
Threshold Exceeded?	**N/A**	**No**

1. The reported pollutant concentration is at the closest receptor (maximally exposed individual receptor).
Source: Refer to **Appendix B**.

Operational Health Risk Analysis

Operational emissions from the Project would result from mobile sources (i.e., motor vehicle use) and area sources (such as the use of landscape maintenance equipment, consumer products, and architectural coatings). As discussed in the Air Quality Assessment (**Appendix A-1**), the majority of these emissions would be generated by diesel and gasoline-powered vehicle travel occurring off-site from light-duty vehicles trips by staff to and from the Project site. Light duty vehicles are not substantial sources of TAC emissions (e.g., DPM), which are primarily associated with diesel fueled vehicles.

The Project would include up to 12 4-MW stationary emergency diesel generators, which would only be used upon hypothetical loss of grid power, and for periodic maintenance and testing, which is regulated by the SCAQMD permit process. As discussed above, as part of the regulatory compliance process, the Applicant will obtain PTO from the SCAQMD before installation or operation of the emergency generators, which verifies that the generators meet the applicable BACT requirements and comply with SCAQMD Rule 1470 and Rule 1401, which would minimize TAC emissions. An operational health risk analysis would be required to comply with SCAQMD's Rule 1401 permit requirements. Before the generators can operate, DPM emissions and cancer risk associated with the proposed diesel generators would be regulated by the SCAQMD permit process to ensure that associated emission levels remain less than significant.

4.3d Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact.

Construction

Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort,*

repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Odors may be generated during construction activities such as, equipment diesel exhaust, architectural coatings volatile organic compounds, and paving activities. However, these odors would be temporary, are not expected to affect a substantial number of people and would disperse rapidly. Therefore, impacts related to odors associated with the Project's construction-related activities would be less than significant.

Operations

The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the Project would not create objectionable odors and no impact would occur.

4.4 Biological Resources

This Section is based on the *Tree Evaluation Report* (Arborgate Consulting, Inc., July 2024), which is included as **Appendix C: Tree Evaluation Report**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
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?				X
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?				X
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?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
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?				X

Impact Analysis

4.4a 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?

Less Than Significant Impact. The Project Site is occupied by an existing commercial office building, associated utility building, and associated surface parking lot. The Project Site contains

ornamental landscaping, including several mature ornamental trees. The Project Site is in an urbanized area of the City and is surrounded by office, residential, and utility uses.

A review of the California Department of Fish and Wildlife ("CDFW") California Natural Biodiversity Database ("CNDDB") QuickView Tool found 14 threatened or endangered wildlife species in the El Monte Quadrangle, which is the Project Site's quadrangle.[15] The 14 species include the following:

Birds

- Swainson's Hawk (*Buteo swainsoni*)
- Western Yellow-billed Cuckoo (*Coccyzus americanus occidentalis*)
- Bank Swallow (*Riparia riparia*)
- Light-footed Ridgways Rail (*Rallus obsoletus levipes*)
- Willow Flycatcher (*Empidonax traillii*)
- Southwestern Willow Flycatcher (*Empidonax traillii extimus*)
- Least Bells Vireo (*Vireo bellii pusillus*)
- Coastal California Gnatcatcher (*Polioptila californica californica*)

Amphibians

- Western Spadefoot (*Spea hammondii*)

Insects

- Crotchs Bumble Bee (*Bombus crotchii*)

Fish

- Santa Ana Sucker (*Catostomus santaanae*)

Reptiles

- Western Pond Turtle (*Emys marmorata*)

Plants - Vascular

- Nevins Barberry (*Berberis nevinii*)
- Slender-horned Spineflower (*Dodecahema leptoceras*)

There is currently no native habitat within or near the Project Site to support the listed species above. The Project Site is either out of range for these species or would not provide suitable habitat due to its highly disturbed nature and the fact that the Project Site is located in a highly urbanized area. Additionally, no natural biological resources or communities are present within, adjacent to, or in the vicinity of the Project Site.

Furthermore, according to the Tree Evaluation Report prepared for the Project, 337 trees are currently located on-site. However, none of these tree species are rare or endangered, and only

[15] California Department of Fish and Wildlife (CDFW), California Natural Biodiversity Database QuickView Tool, 2023, https://apps.wildlife.ca.gov/bios6/?tool=cnddbqv. Accessed March 26, 2024.

one of the tree species (California sycamore, *Platanus racemosa*) is native or naturally occurring in California. None of the trees are naturally occurring on the Project Site.[16]

Therefore, the Project would not result in 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. A less than significant impact would occur.

4.4b 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?

4.4c 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?

No Impact. According to the United States Fish and Wildlife Service ("USFWS") National Wetlands Inventory, no riparian habitats or wetlands are present on or adjacent to the Project Site.[17] The nearest identified wetland is a freshwater pond located approximately one mile southwest of the Project Site in the City of Montebello. Therefore, the Project would not have an adverse effect on riparian habitat or other sensitive natural community or on state or federally protected wetlands. No impact would occur in this regard.

4.4d 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?

Less Than Significant Impact. The Project Site is fully developed, surrounded by urban development, and is not part of an established wildlife corridor. Project development would occur within the Project Site and would not impact the movement of any native wildlife species.

The Project site contains ornamental landscaping and trees along the perimeter of the Project Site and throughout the parking lot. It is unlikely that the smaller trees, grasses, and shrubs on-site would provide suitable habitat for any native resident or wildlife species. However, the existing mature trees may provide habitat for nesting birds. Most bird nests and eggs are protected under the California Fish and Game Code ("CFGC") Section 3503 and the Migratory Bird Treaty Act ("MBTA"). Project construction activities and tree maintenance activities should occur outside of the general avian breeding season of February 1st to through August 31st to the extent feasible. If Project-related construction, demolition, and tree maintenance activities cannot occur outside of the general avian breeding season (February 1st to through August 31st), a pre-activity nesting bird survey will be conducted before the onset of the aforementioned activities, within a maximum of 14 days before commencement. The survey will be conducted by a qualified biologist as determined by the City. The survey will be conducted within all suitable nesting habitat located within the area of activity, which includes a 250-foot survey buffer around

[16] Arborgate Consulting, Inc, Tree Evaluation Report, 2024.
[17] United States Fish and Wildlife Service, National Wetlands Inventory, 2021, https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed on February 7, 2024.

the Project Site to account for all potentially nesting birds on and in the immediate vicinity. If no nesting birds are found, the Project-related activities may commence without potential impacts to nesting birds. Therefore, with compliance with CGFC Section 3503 and the MBTA, the Project would have a less than significant impact on 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.

4.4e Would the project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. As discussed in the Tree Evaluation, permission to remove or prune trees along Saturn Street must be obtained, if needed, by the City. Provisions for the removal and planting of trees and landscaping in public property is addressed in MPMC section 9.63.060, Tree Removal Permit, which requires that persons desiring to remove trees from public property abutting property they own or occupy apply for a tree removal permit. MPMC Section 9.63.050, Permit, also requires a permit for the planting of any trees in any portion of a public street or within five feet of any curb or sidewalk.

The City does not regulate the preservation of trees on private property. A number of existing trees will be removed to accommodate the Project. For instance, most of the carrotwood trees on-site within the existing parking lot would be removed to accommodate the proposed data center building. However, most of the existing trees on-site are in declining health due to several years of hard low-bid pruning, poor soil compaction and turf management, and/or lack of root space. Therefore, a number of trees will also be removed due to poor health and structure. Other trees in poor health would be replaced, maintained and properly pruned, or further analyzed in a risk assessment.

Pursuant to the pertinent regulations as described above, the Project would be required to apply for tree removal and planting permits for the removal and planting of street trees, specifically. Upon the City's approval of and implementation of the tree removal and planting permits for street trees, the Project would not conflict with local policies or ordinances protecting biological resources, and impacts would be less than significant.

4.4f Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. No portions of the City are located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[18] [19] Therefore, the Project would not result in conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.

[18] CDFW, NCCP Plan Summaries, 2023, https://wildlife.ca.gov/conservation/planning/nccp/plans. Accessed February 7, 2024.
[19] Data Basin, Habitat Conservation Plan (HCP), California, https://databasin.org/maps/new/#datasets=c116dd0d32df408cb44ece185d98731c. Accessed February 7, 2024.

4.5 Cultural Resources

This Section is based on the *Cultural Resources Assessment* (CRA) (BCR Consulting, LLC, July 2024), and Assembly Bill 52 Communications, which are included as **Appendix D Cultural Resources Assessment** and **Appendix L: Assembly Bill 52 Communications**, respectively.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

Impact Analysis

4.5a Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No Impact. CEQA Guidelines Section 15064.5(a) generally defines a historic resource as a resource that is: (1) listed in, or eligible for listing in the California Register of Historic Resources (California Register); (2) listed in a local register of historical resources (as defined in Section 5020.1(k) of the PRC); (3) identified as significant in a historical resources survey meeting the criteria in Section 5024.1(g) of the PRC; and/or (4) determined to be a historical resource by a project's lead agency. Additionally, any object, building, structure, site, area, place, record, or manuscript which a Lead Agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered a historical resource, provided the Lead Agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource is considered by the Lead Agency to be historically significant if the resource meets the criteria for listing on the California Register.

The Project Site is currently developed with an existing commercial office building, utility building, parking lot, and ornamental trees and landscaping. The State-recommended threshold under which buildings may be considered historic resources is a construction age of 50 years. In order that the CRA's evaluation remain valid for a minimum of five years after the date of the CRA, all resources older than 45 years (i.e., resources from the historic period) were evaluated for listing eligibility in the California Register, or CEQA significance.[20]

[20] BCR Consulting, LLC, Cultural Resources Assessment, 2024.

The existing commercial office building was originally constructed in 1979 for use as a corporate office. While the building is historic in age, research failed to associate it with important events related to the development of the area (California Register Criterion 1); failed to associate it with the lives of any persons important to local, California, or U.S. History (California Register Criterion 2); is not distinctive from other office buildings of that era and does not embody any distinctive characteristics, nor does it represent the work of an important creative individual or possess high artistic values (California Register Criterion 3); and has not and is not likely to yield information important to prehistory or history (California Register Criterion 4). Therefore, the Project Site and its historic-period buildings are not eligible under any of the four criteria for listing on the California Register of Historical Resources, and as such are not recommended historical resources under CEQA. There are no other historical resources or resources with the potential for historical significance on-site. Therefore, the Project would not cause a substantial adverse change in the significance of a historical resource, and no impact would occur.

4.5b Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant Impact with Mitigation Incorporated. The cultural resources records search conducted for the CRA at the South Central Costal Information Center ("SCCIC") identified 12 cultural resources studies that have previously taken place within a 0.5-mile radius of the Project Site, with one study assessing the Project Site. That study resulted in no cultural resources having been recorded within its boundaries.

An on-site pedestrian survey conducted in February 2024 did not identify artifacts or potential for significant buried remains. No other cultural resources (including prehistoric or historic archaeological or historic architectural resources) were identified during the field survey. Disturbances associated with previous excavation and construction of the existing commercial office building at the Project Site have been severe and have disrupted soil beyond depths at which buried cultural resources are likely. Therefore, the potential to encounter in-situ remains associated with significant archaeological materials during Project activities is low. Nevertheless, ground-disturbing activities have the potential to reveal buried deposits not observed on the surface during previous surveys. To mitigate such impacts, the Project would be required to implement **Mitigation Measure (MM) CUL-1**, which sets forth procedures for inadvertent discovery of archaeological resources. Implementation of **MM CUL-1** would reduce Project impacts to archaeological resources to a less than significant level.

4.5c Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. Given the Project Site has been subject to extensive disruption, the potential to disturb or impact any human remains is unlikely. However, there is always a possibility that that human remains could be interred beneath the Project Site. If human remains were found, those remains would require proper treatment in accordance with applicable laws. PRC Section 5097, et seq., and California State Health and Safety Code ("HSC") Sections 7050.5-7055 describe the general provisions regarding human remains, including the requirements if any human remains are accidentally discovered during excavation of a site. The requirements and

procedures set forth in PRC Section 5097.98 would be implemented if human remains are discovered, including notification of the County Coroner, notification of the NAHC if the remains are determined to be prehistoric, and consultation with the individual identified by the NAHC to be the "most likely descendant." If human remains are found during excavation, the Project will comply with California State HSC Section 7050.5 in which excavation must stop within 50 feet of the discovery until the County Coroner has made a determination of origin and disposition of the remains pursuant to PRC Section 5097.98 and appropriate recommendations have been made for the treatment and disposition of the remains. Compliance with the established regulatory framework would ensure the proper treatment of human remains should they be encountered. Therefore, the Project would result in less than significant impact concerning the potential to disturb any human remains.

Mitigation Measures

MM CUL-1 In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find must halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) ("qualified archaeologist") must be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, a Native American representative must also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility must be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via Project redesign, a qualified archaeologist will prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan will identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, must recover and document the scientifically consequential information that justifies the resource's significance. The City will review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation must be submitted to the regional repository of the California Historical Resources Information System, per CEQA Guidelines Section 15126.4(b)(3)(C).

4.6 Energy

This Section is based on the Energy Calculations, which are included in **Appendix A-2: Offsite Improvements for Southern California Edison Service** and **Appendix E: Energy Calculations**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Regulatory Setting

State

California's Energy Efficiency Standards for Residential and Non-Residential Buildings (Title 24)

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission ("CEC")) in June 1977 and are updated every three years (CCR Title 24, Part 6). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

On August 11, 2021, the CEC adopted the 2022 Energy Code. In December, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. Among other updates like strengthened ventilation standards for gas cooking appliances, the 2022 Energy Code includes updated standards in three major areas:

- New electric heat pump requirements for residential uses, schools, offices, banks, libraries, retail, and grocery stores.
- The promotion of electric-ready requirements for new homes including the addition of circuitry for electric appliances, battery storage panels, and dedicated infrastructure to allow for the conversion from natural gas to electricity.
- The expansion of solar photovoltaic and battery storage standards to additional land uses including high-rise multifamily residences, hotels and motels, tenant spaces, offices, (including medical offices and clinics), retail and grocery stores, restaurants, schools, and civic uses (including theaters auditoriums, and convention centers).

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a Statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California

Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary measures (CALGreen Tier 1 and Tier 2) that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2022 and went into effect January 1, 2023. Projects whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.[21]

Renewable Portfolio Standard

In 2002, California established its Renewable Portfolio Standard (RPS) program[22] with the goal of increasing the annual percentage of renewable energy in the State's electricity mix by the equivalent of at least 1 percent of sales, with an aggregate total of 20 percent by 2017. Since then various pieces of legislation have provided further goals. Signed in 2018, SB 100 revised the program's goal to achieve the 50 percent renewable resources target by December 31, 2026, and a 60 percent renewable resources target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10-percent total reduction in 2020. Petroleum importers, refiners and wholesalers can either develop their own low carbon fuel products or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas and hydrogen.

CARB Scoping Plan

Adopted December 15, 2022, CARB's 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high global warming potential (GWP); providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy

[21] California Energy Commission, 2022 Building Energy Efficiency Standards, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency. Accessed February 18, 2024.

[22] The Renewable Portfolio Standard is a flexible, market-driven policy to ensure that the public benefits of wind, solar, biomass, and geothermal energy continue to be realized as electricity markets become more competitive. The policy ensures that a minimum amount of renewable energy is included in the portfolio of electricity resources serving a state or country.

alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place.

Impact Analysis

4.6a Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact.

Southern California Edison (SCE) provides electricity to the Project area. Total electricity demand in SCE's service area is forecast to increase by approximately 8,000 GWh—or 8 billion kWh—between 2024 and 2030.[23]

Construction

The energy consumption associated with Project construction includes primarily diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption. Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers, and heating, ventilation, and air conditioning) would be powered by a generator or temporary pole power. The amount of electricity used during construction would be minimal; typical demand would stem from the use of electrically powered hand tools and several construction trailers by managerial staff during the hours of construction activities. The majority of the energy used during construction would be from petroleum (e.g., gasoline and diesel).

Construction activity is anticipated to occur over a duration of approximately two years, beginning as early as September 2025 and ending as early as August 2027. The energy associated with Project construction includes electricity use associated with water utilized for dust control, diesel fuel from on-road hauling trips, vendor trips, and off-road construction diesel equipment, as well as gasoline fuel from on-road worker commute trips. Because construction activities typically do not require natural gas, it is not included in the following discussion. The methodology for each category is discussed below. Quantifications of construction energy are provided by the Project below; see **Table 4.6-1: Energy Use During Construction**.

[23] California Energy Commission, California Energy Demand 2018-2030 Revised Forecast, Figure 49 Historical and Projected Baseline Consumption SCE Planning Area, 2018, https://www.enreergy.ca.gov/data-reports/reports/integrated-energy-policy-report/2017-integrated-energy-policy-report/2017-iepr. Accessed February 18, 2024.

Table 4.6-1: Energy Use During Construction			
Source	**Project Construction Usage**	**Los Angeles County Annual Energy Consumption**	**Percentage of Countywide Consumption**
Electricity Use		**GWh**	
Water Consumption[1]	0.05	68,485	0.0001%
Diesel Use		**Gallons**	
On-Road Construction Trips[2]	32,062	4,129,527,647	0.0008%
Off-Road Construction Equipment[3,4]	56,608	4,129,527,647	0.0014%
Construction Diesel Total	88,670	4,129,527,647	0.0021%
Gasoline		**Gallons**	
On-Road Construction Trips[2]	14,965	4,129,744,580	0.0004%

1. Construction water use based on acres disturbed per day per construction sequencing and estimated water use per acre. Water use includes the energy required to convey water to and from the Project Site.
2. On-road mobile source fuel use based on vehicle miles traveled (VMT) from CalEEMod and fleet-average fuel consumption in gallons per mile from EMFAC2021 in Los Angeles County.
3. Off-road mobile source fuel usage based on a fuel usage rate of 0.05 gallons of diesel per horsepower (hp)-hour from USEPA.
4. As discussed in **Appendix A-2**, the six pieces of equipment used for the offsite improvements for SCE service would result in a negligible increase in energy usage and would not require increased demand or capacity.

Source: Refer to the energy calculations in **Appendix E**.

Electricity

The Project's electrical demand is expected to be served by existing SCE electrical facilities. The Project's construction-related electrical demand would total approximately 0.0507 GWh. This would represent 0.0001 percent of SCE's forecast 2025 increased demand. Therefore, Project construction would not result in wasteful, inefficient, or unnecessary consumption of electrical resources.

Fuel

During Project construction, transportation energy use would depend on the type and number of trips, vehicle miles traveled (VMT), fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would be from transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel/gasoline. The use of energy resources by these vehicles would fluctuate according to the construction phase and would be temporary. Project construction would total approximately 88,670 gallons of diesel and 14,965 gallons of gasoline. As shown above in **Table 4.6-1**, the proposed Project's fuel from the entire construction period would increase fuel use in the county by approximately 0.021 percent of diesel and 0.0004 percent of gasoline.

Impacts related to transportation energy use during Project construction would be temporary and would not require expanded energy supplies or construction of new infrastructure. Therefore, Project construction would not result in wasteful, inefficient, or unnecessary fuel consumption.

Operations

The energy consumption associated with Project operations would occur from building energy (electricity) use, water use, and transportation-related fuel use. Annual Energy use during Project operation is shown in **Table 4.6-2: Annual Energy Consumption During Operations**.

Table 4.6-2: Annual Energy Consumption During Operations

Source	Project Operational Usage	Los Angeles County Annual Energy Consumption	Percentage Increase Countywide
Electricity Use	**GWh**		
Building Energy[1]	438.01	68,485	0.6396%
Water Conveyance	0.08		0.0001%
Natural Gas Use[2]	**Therms/Year (therms/year)**		
Area	0	0	0
Diesel Use	**Gallons/Year**		
Mobile[3]	1,018	535,939,687	0.0002%
Emergency Generators[4]	198,812		0.0371%
Gasoline Use	**Gallons/Year**		
Mobile[2]	10,172	3,369,809,065	0.0003%

1. The electricity and natural gas usage are based on Project-specific estimates and CalEEMod defaults. The Project during peak load conditions would have a demand of 49,999 kilowatts per hour (KW/h). The analysis assumes 24/7 operations (8,760 hours per year) which would result in a maximum electrical usage of 437,991 megawatt hours (MWh) per year. Plus CalEEMod default assumptions for lighting for surface parking (23.3 MWh) for a total of 438,015 MWh or 438.01 GWh annually.
2. The Project is not anticipated to use natural gas.
3. Calculated based on the mobile source fuel use based on vehicle miles traveled (VMT) and fleet-average fuel consumption (in gallons per mile) from EMFAC2021 for operational year 2027.
4. Assumed 14 emergency generators each used up to 50 hours per year for testing and maintenance with a 277 gallon per hour fuel flow.

Source: Refer to the energy calculations in **Appendix E**.

Electricity

The Project's estimated operational electrical demand would total approximately 438 GWh per year. SCE'S forecasted increase in demand for its services area by 2026 is 110,690 GWh.[24] Thus, this Project would represent 0.64 percent of SCE's forecast 2026 demand, thus, would result in a negligible increased demand compared to SCE's overall demand. In addition, SCE evaluated the anticipated electricity demand for the Project and concluded that SCE has adequate energy supply to efficiently serve the Project. It is also noted that the Project (i.e., design and materials) would be subject to compliance with the 2022 Building Energy Efficiency Standards. The Project would also be required to comply with CALGreen, which establishes planning and design standards for sustainable site development, energy efficiency (more than California Energy Code requirements), water conservation, material conservation, and internal air contaminants.

[24] California Energy Commission, California Energy Demand Forecast, 2021-2035, Electricity Consumption by Sector (Total Consumption), https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2021-integrated-energy-policy-report/2021-1. Accessed August 16, 2024.

The primary purpose of the data center is to house computer servers; therefore, the uses typically associated with data centers are storing and processing data, which consumes energy. It should also be noted that the Project is anticipated to have a blended Power Usage Effectiveness ("PUE") of 1.2 due to free cooling modules on the air-cooled chillers. This PUE rating is better the average PUE for data centers, which indicates that the Project would not result in the wasteful or inefficient use of energy. The Project would be more energy efficient than the average data center. Due to energy efficiency measures incorporated into the facility, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy, or wasteful uses of electricity resources.

Natural Gas

Southern California Gas Company (SoCalGas) provides natural gas to the Project area. Natural gas is currently not used at the Project Site. The proposed Project would not use natural gas during operations. Therefore, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of natural gas resources.

Fuel

As shown in **Table 4.6-2**, during Project operations, diesel fuel consumption would be approximately 199,830 gallons per year. The Project would generate 52 daily trips. As shown above in **Table 4.6-2**, the County's annual diesel fuel use in 2027 is anticipated to be 535,939,687 gallons.[25] Estimated Project operational diesel fuel use would represent 0.0002 percent of the County's current diesel use. Thus, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. The 14 emergency generators are estimated to utilize approximately 198,912 gallons per year of diesel due to testing and maintenance. Estimated Project operational gasoline fuel use would be approximately 10,172 gallons per year, which represent 0.0003 percent of the County's current gasoline use. Thus, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary fuel consumption. In addition, this analysis includes a conservative estimate of fuel usage.

None of the projected energy uses exceed one percent of the corresponding County use. Project operations would not substantially affect existing energy or fuel supplies or resources. Further, the Project would be subject to compliance with applicable energy standards and new capacity would not be required. Therefore, the Project would result in a less than significant impact concerning consumption of energy resources, and no mitigation is required.

4.6b Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Project design and operations would be subject to compliance with State Building Energy Efficiency Standards, appliance efficiency regulations, and CALGreen Code

[25] California Air Resources Board, EMFAC2017, 2018.

standards. As concluded in Response 4.6a, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Although the City has not adopted any specific plans that address energy efficiency, the City adopted the Climate Action Plan in 2012 to help the City comply with the City's GHG emissions reduction goals through implementation of many measures that also result in energy conservation and efficiency. In addition, the Project would receive its electricity from SCE, which satisfies its renewable energy portfolio standards and includes approximate 33.2 percent of its energy mix from renewable energy sources. The Project would not otherwise conflict with or obstruct compliance with plans for renewable energy. As such, the Project would be designed to meet all applicable State building energy efficiency standards as well as the City's energy efficiency standards. Therefore, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation would be required.

4.7 Geology and Soils

This Section is based on the *Geotechnical Investigation* (June 2024, Leighton Consulting, Inc.) and *Cultural Resources Assessment* (BCR Consulting, LLC, July 2024), which are included in **Appendix F: Geotechnical Investigation and Appendix D: Cultural Resources Assessment**, respectively.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
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?			X	
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

Impact Analysis

4.7a.i Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving the 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.

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as Alquist Priolo (AP) Earthquake Fault Zones, around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). According to the Geotechnical Investigation prepared for this Project, there are no identified Alquist-Priolo Earthquake Fault Zones that traverse the Project Site.[26] Therefore, the potential for surface fault rupture at the Project Site is considered low, and the Project would not cause potential substantial adverse effects involving rupture of a known earthquake fault. Nonetheless, the design of the proposed structures on-site would be designed to accommodate seismic loading, pursuant to the most recent California Building Code (CBC), City Building Code, and engineering design recommendations in the Geotechnical Investigation. The City's Building and Safety Division is responsible for implementing the provisions of the applicable building codes. The Project would be required to comply with plan review and permitting requirements of the City before the start of construction, as well as comply with the recommendations provided in a final design, and site-specific, geotechnical report that is subject to review and approval by the City. Therefore, the Project would not result in substantial damage to structures or infrastructure or expose people to substantial risk of injury involving the rupture of a known earthquake fault, and impacts from fault rupture would be less than significant.

4.7a.ii Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving strong seismic ground shaking?

Less Than Significant Impact. The Project Site is within the Southern California region, a seismically active area, with several active and potentially active faults mapped within 10 kilometers of the Project Site, and thus is exposed to potential risk involving strong seismic ground shaking. Accordingly, the Project would be subject to compliance with the most recent CBC and City Building Code, which are intended to minimize potential risk involving seismic ground shaking. The Project would also be required to adhere to engineering design recommendations presented in the Geotechnical Investigation. The City would verify compliance with the Geotechnical Investigation recommendations through the Project's Building Permit review process. Therefore, following compliance with the established regulatory framework and recommendations provided by the Geotechnical Investigation, the Project would not cause

[26] Leighton Consultants, Inc. Geotechnical Investigation, 2024.

potential substantial adverse effects involving strong seismic ground shaking, and impacts would be less than significant.

4.7a.iii Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a seismic phenomenon in which loose, saturated, relatively uniform fine- to medium-grained clean cohesionless soils behave similarly to a fluid when subjected to high-intensity and long-duration ground shaking. Three criteria must be met for liquefaction to occur: 1) loose, clean granular soils, 2) shallow groundwater, and 3) strong, long-duration ground shaking.

According to the Geotechnical Investigation, the Project Site is underlain by relatively medium dense to dense engineered artificial fill overlying hard bedrock. Additionally, the Geotechnical Investigation's review of the California Geological Survey's Earthquake Zones of Required Investigation for the El Monte Quadrangle Map indicates that the Project Site is not within an area potentially susceptible to liquefaction. Furthermore, groundwater was not encountered in the exploratory borings conducted for the Project Site to the maximum depth explored of 36.5 feet below ground surface (bgs). Therefore, due to the presence of engineered fill, deep groundwater levels, and shallow bedrock within the Project Site, the Project would not cause potential adverse effects involving seismic-related ground failure, including liquefaction. No impact would occur in this regard.

4.7a.iv Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving landslides?

No Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. According to the Geotechnical Investigation, the Project Site is not located in an area mapped as potentially susceptible to seismically-induced landslides. No landslides are mapped or known to exist at the Project Site or vicinity. The slopes to the northwest of the Project Site below the La Loma reservoir water tanks are reported as buttressed with engineered fill. Therefore, the potential for seismically-induced landslides to impact the Project Site is very low, and the Project would not cause adverse effects involving landslides. No impact would occur in this regard.

4.7b Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project Site is located on relatively level ground (with the exception of the moderate slopes on the northern end of the Project Site), which would reduce the likelihood of soil erosion. However, earthmoving activities associated with proposed demolition and construction activities have the potential to result in soil erosion or the loss of topsoil. Development of the Project would be subject to local and State regulations for erosion control and grading during construction. For example, the Project would be required to comply with the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective September 1st, 2023, which regulates construction activities to minimize

water pollution, including sediment risk from construction activities to receiving waters. Project development would be subject to the National Pollution Discharge Elimination System (NPDES) program, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which is further discussed in **Section 4.10: Hydrology and Water Quality**. The Project's construction contractor would be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the CGP during grading and construction activities. Typical construction BMPs include, but are not limited to, watering soil, soil cover of inactive areas, gravel bags, and fiber rolls.

Additionally, after Project completion, the Project Site would be developed with a new data center building, ancillary equipment yard, substation, parking, and associated hardscape and landscape improvements. All landscaped areas would be required to comply with the provisions of MPMC Chapter 6.31, Water Efficient Landscapes. The Project would also implement operational BMPs and Low Impact Development (LID) standards in compliance with the MPMC Chapter 6.30, Stormwater and Urban Runoff Pollution Prevention Controls, which requires stormwater and urban runoff pollution prevention controls; see **Section 4.10: Hydrology and Water Quality** for more information on operational BMPs. Implementation of the BMPs and LID standards would help ensure that soil erosion would not occur during the Project's operation phase. BMP implementation would be ensured through the City's building plan check and development review process.

For the reasons listed above, soil erosion impacts from the Project's construction and operation phases would be less than significant.

4.7c 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?

Less Than Significant Impact. The Project Site would not be subject to seismically-induced liquefaction (see Response 4.7a.iii) or landslides (see Response 4.7a.iv).

For lateral spreading to occur, the liquefiable zone must be continuous, unconstrained laterally, and free to move along gently sloping ground toward an unconfined area. Since liquefaction is not considered a hazard at the Project Site (see Response 4.7a.iii), earthquake-induced lateral spreading is also not considered a hazard at the Project site. Therefore, there would be no impacts associated with lateral spreading.

Ground surface subsidence generally results from the extraction of fluids or gas from the subsurface, which can result in a gradual lowering of the ground level. The Project Site is not mapped in an area of subsidence by the U.S. Geological Survey.[27] Furthermore, due to the absence of groundwater during exploration, the Project would not involve any dewatering activities that could cause ground subsidence on the Project Site. Additionally, according to the Geotechnical Investigation, minor ground subsidence is expected due to earthquake-induced settlement which is estimated to be less than one inch, with differential seismic settlements of

[27] United States Geological Survey, Areas of Land Subsidence in California, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed March 19, 2024.

0.5 inch over a distance of 30 feet. Therefore, the potential for ground collapse and other adverse effects due to subsidence to occur on the Project site is considered low, and impacts associated with subsidence would be less than significant.

Regarding collapsible soils, the results of the testing of soil samples conducted for the Geotechnical Investigation indicated that on-site soils are not susceptible to collapse when wetted. Therefore, the Project's potential for collapse is considered low, and impacts associated with collapse would be less than significant.

For the reasons substantiated above, Project development would not cause substantial hazards arising from unstable soils. Impacts would be less than significant.

4.7d 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 risk to life or property?

Less Than Significant Impact. According to the Geotechnical Investigation, a combined evaluation of test results from past on-site geotechnical surveys and this current Geotechnical Investigation for this Project indicate that the soils within the Project Site have range from medium expansion to very low results. Therefore, the Project Site's expansion potential is considered to be low. The Project would be designed and constructed in accordance with relevant federal, State, and City regulations. Additionally, the Geotechnical Investigation includes engineering design recommendations to onsite soils, less any deleterious material or organic matter, as required fills. Any required import material should consist of relatively non-expansive soils with a very low to low expansion index. The City would verify compliance with the Geotechnical Investigation recommendations through the Project's Building Permit process. Therefore, following compliance with pertinent regulations and Geotechnical Investigation recommendations, the Project would not create substantial risk involving expansive soils, and impacts would be less than significant.

4.7e 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?

No Impact. The Project would construct sewer laterals that would connect to existing sewer lines in surrounding roadways. The Project does not propose to use septic tanks or alternative wastewater disposal systems. Temporary sanitary systems would be brought in during construction and removed when the Project becomes operational. Therefore, no impact would occur in this regard.

4.7f Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation Incorporated. Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These resources are valued for the information they yield about the earth's history and its past ecological settings. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area. According to the Geotechnical Investigation, the Project Site is underlain

by artificial fill ranging in thickness from 2 to over 15 feet. According to the paleontology collection records search conducted within the El Monte Quadrangle with the Natural History Museum of Los Angeles County for the CRA, there are no fossil localities that lie directly within the Project Site. However, fossil localities nearby from the same sedimentary deposits may occur in the Project area, either at or beneath the surface. Therefore, Project impacts to paleontological resources may be potentially significant during ground-disturbing activities. To address such impacts, the Project would be subject to compliance with **MM GEO-1**, which requires a qualified paleontological monitor to be on-site during Project ground-disturbing activities. Therefore, following compliance with **MM GEO-1**, the Project's potential impacts to paleontological resources would be reduced to a less than significant level.

Mitigation Measures

MM GEO-1 If construction personnel encounter paleontological resources during ground-disturbing activities, they must inform the site construction superintendent who will notify the City and Project Applicant. The Project Applicant must then contact a qualified paleontologist as defined by the Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources by the SVP (SVP, 2010) and all ground-disturbing activity must cease in the immediate area of the find (within a 50-foot buffer) until the paleontologist can evaluate the find.

If the discoveries are determined to be significant, full-time paleontological monitoring will be recommended for the remainder of ground disturbance for the project. Paleontological monitoring must entail the visual inspection of excavated or graded areas and trench sidewalls. If a paleontological resource is discovered, the monitor will have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and collected. Monitoring efforts can be reduced or eliminated at the discretion of the project paleontologist.

Upon completion of fieldwork, all significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation. Preparation will include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossil specimens must be identified to the most specific taxonomic level possible, cataloged, analyzed, and delivered the Natural History Museum of Los Angeles County for permanent curation and storage. The cost of curation is assessed by the repository and is the responsibility of the Project Applicant. At the conclusion of laboratory work and museum curation, a final Paleontological Monitoring Report will be prepared describing the results of the paleontological mitigation monitoring efforts associated with the Project. The report must include a summary of the field and laboratory methods, an overview of the Project area geology and paleontology, a list of taxa recovered, an analysis of fossils recovered

and their scientific significance, and recommendations. A copy of the report must be submitted to the Natural History Museum of Los Angeles County.

4.8 Greenhouse Gas Emissions

This Section is based on the *Greenhouse Gas Emissions Analysis Memorandum* (Kimley-Horn, August 2024), which is included in **Appendix A-2: Offsite Improvements for Southern California Service** and **Appendix G: Greenhouse Gas Emissions Analysis Memorandum**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Regulatory Setting

Federal

To date, national standards have not been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

U.S. Environmental Protection Agency Endangerment Finding

The U.S. EPA authority to regulate GHG emissions stems from the U.S. Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Federal Clean Air Act (FCAA) and must be regulated if these gases

could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the U.S. EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing FCAA and the U.S. EPA's assessment of the scientific evidence that form the basis for the U.S. EPA's regulatory actions.

Federal Vehicle Standards

In response to the U.S. Supreme Court ruling discussed above, Executive Order 13432 was issued in 2007 directing the U.S. EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency.

On April 2, 2018, the Administrator signed the Mid-term Evaluation Final Determination which finds that the model year 2022-2025 GHG standards are not appropriate in light of the record before U.S. EPA and, therefore, should be revised.[28]

On September 19, 2019, under the Safer, Affordable, Fuel-Efficient (SAFE) Vehicles Rule, the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHSTA) and the U.S. EPA issued the final "One National Program Rule." The rule states that federal law preempts state and local laws regarding tailpipe GHG emissions standards, zero emissions vehicle (ZEV) mandates, and fuel economy for automobiles and light duty trucks. The rule revokes California's Clean Air Act waiver and preempts California's Advanced Clean Car Regulations.[29,30]

On September 20, 2019, a lawsuit was filed by California and a coalition of 22 other states, and the cities of Los Angeles, New York and Washington, D.C., in the United States District Court for the District of Columbia (Case 1:19-cv-02826) challenging the SAFE Rule and arguing that U.S. EPA lacks the legal authority to withdraw the California waiver. In April 2021, the U.S. EPA announced

[28] U.S. Environmental Protection Agency. Midterm Evaluation of Light-Duty Vehicle Greenhouse Gas Emissions Standards for Model Years 2022-2025, https://www.epa.gov/regulations-emissions-vehicles-and-engines/midterm-evaluation-light-duty-vehicle-greenhouse-gas. Accessed April 12, 2024.

[29] U.S. Department of Transportation and U.S. EPA. 2019. One National Program Rule on Federal Preemption of State Fuel Economy Standards, https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100XI4W.pdf. Accessed May 7, 2024.

[30] Southern California Association of Governments. 2019. Final Federal Safer, Affordable, Fuel-Efficient Vehicles Rule Part I (Supplemental Report), http://www.scag.ca.gov/committees/CommitteeDocLibrary/EEC_Item8_RC_Item10%20Supplemental%20Report.pdf. Accessed May 7, 2024.

it would reconsider its previous withdrawal and grant California permission to set more stringent climate requirements for cars and SUVs. On March 9, 2022, the U.S. EPA restored California's 2013 waiver to full force, including both its GHG standards and ZEV sales requirements.

In December 2021, the U.S. EPA finalized federal GHG emissions standards for passenger cars and light trucks for Model Years 2023 through 2026. These standards are the strongest vehicle emissions standards ever established for the light-duty vehicle sector and are based on sound science and grounded in a rigorous assessment of current and future technologies. The updated standards will result in avoiding more than three billion tons of GHG emissions through 2050.[31]

Presidential Executive Orders 13990 and 14008

On January 20, 2021, President Biden issued Executive Order 13990, "Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis". Executive Order 13990 directs Federal agencies to immediately review and take action to address the promulgation of Federal regulations and other actions that conflict with these important national objectives and to immediately commence work to confront the climate crisis. Executive Order 13990 directs the Council on Environmental Quality (CEQ) to review CEQ's 2020 regulations implementing the procedural requirements of the National Environmental Policy Act (NEPA) and identify necessary changes or actions to meet the objectives of Executive Order 13990.

Executive Order 13390 also directs the U.S. EPA to consider whether to propose suspending, revising, or rescinding the standards previously revised under the "The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks," promulgated in April 2020.

On January 27, 2021, President Biden signed Executive Order 14008, "Tackling the Climate Crisis at Home and Abroad," to declare the Administration's policy to move quickly to build resilience, both at home and abroad, against the impacts of climate change that are already manifest and will continue to intensify according to current trajectories. In line with these Executive Order directives, CEQ is reviewing the 2020 NEPA regulations and plans to publish a notice of proposed rulemaking (NPRM) to identify necessary revisions in order to comply with the law; meet the environmental, climate change, and environmental justice objectives of Executive Orders 13990 and 14008; ensure full and fair public involvement in the NEPA process; provide regulatory certainty to stakeholders; and promote better decision making consistent with NEPA's statutory requirements. This phase 1 rulemaking will propose a narrow set of changes to the 2020 NEPA regulations to address these goals.

State

California Air Resources Board

CARB is responsible for the coordination and oversight of State and local air pollution control programs in California. Various statewide and local initiatives to reduce California's contribution

[31] U.S. EPA, Final Rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026, 2021, https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-revise-existing-national-ghg-emissions. Accessed March 18, 2024.

to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of carbon dioxide equivalent (CO_2e) in the world and produced 369 million gross metric tons (MMT) of CO_2e in 2020.[32] The transportation sector is the State's largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark AB 32 California Global Warming Solutions Act of 2006, was specifically enacted to address GHG emissions. Other legislation, such as Title 24 building efficiency standards and Title 20 appliance energy standards, were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the major legislation related to GHG emissions reduction.

Assembly Bill 32 (California Global Warming Solutions Act of 2006)

AB 32 instructs the CARB to develop and enforce regulations for the reporting and verification of statewide GHG emissions. AB 32 also directed CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020, which would require a reduction of approximately 173 MMT net CO_2e below "business as usual" emission levels. It set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

Climate Change Scoping Plan

The Scoping Plan is a GHG emission reduction roadmap developed and updated by the CARB at least once every five years, as required by AB 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual activities.[33] The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs).[34] The 2017 Scoping Plan Update,[35] shifted focus to the newer Senate Bill (SB) 32 goal of a 40 percent reduction below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress towards

[32] California Air Resources Board, Current California GHG Emissions Inventory Data, 2000-2020 GHG inventory (2022 Edition), https://ww2.arb.ca.gov/ghg-inventory-data. Accessed March 18, 2024.
[33] CARB, Climate Change Scoping Plan, 2008, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed April 22, 2024.
[34] CARB, First Update to the Climate Change Scoping Plan, 2014, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf. Accessed April 22, 2024.
[35] CARB, California's 2017 Climate Change Scoping Plan, 2017, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf. Accessed April 22, 2024.

achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan. According to the Scoping Plan Update, the 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan. A summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan is provided in Table 2 of **Appendix G** of this IS/MND.

The 2022 Scoping Plan Update scenario identifies the need to accelerate AB 32's 2030 target, from 40 percent to 48 percent below 1990 levels. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan Update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology. The Scoping Plan Scenario is summarized in Table 2-1 starting on page 72 of the Scoping Plan. It includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Table 2-1 identifies actions related to a variety of sectors such as: smart growth and reductions in Vehicle Miles Traveled (VMT); light-duty vehicles (LDV) and zero-emission vehicles (ZEV); truck ZEVs; reduce fossil energy, emissions, and GHGs for aviation ocean-going vessels, port operations, freight and passenger rail, oil and gas extraction; and petroleum refining; improvements in electricity generation; electrical appliances in new and existing residential and commercial buildings; electrification and emission reductions across industries such as the for food products, construction equipment, chemicals and allied products, pulp and paper, stone/clay/glass/cement, other industrial manufacturing, and agriculture; retiring of

combined heat and power facilities; low carbon fuels for transportation, business, and industry; improvements in non-combustion methane emissions, and introduction of low GWP refrigerants.

Achieving the targets described in the 2022 Scoping Plan Update will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how actions at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan Update is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan Update discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by developing programs and regulations such as the Green New Deal and Green Building Code.

California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 20 Appliance Efficiency Regulations. The appliance efficiency regulations (CCR Title 20, Sections 1601-1608) include standards for new appliances. Twenty-three categories of appliances are included in the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24 Building Energy Efficiency Standards. California's Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2016 Building Energy Efficiency Standards approved on January 19, 2016, went into effect on January 1, 2017. The 2019 Building Energy Efficiency Standards were adopted on May 9, 2018, and went into effect on January 1, 2020. Under the 2019 standards, homes will use about 53 percent less energy and nonresidential buildings will use about 30 percent less energy than buildings under the 2016 standards.

On August 11, 2021, the CEC adopted the 2022 Building Energy Efficiency Standards (2022 Energy Code). In December, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

Title 24 California Green Building Standards Code. The California Green Building Standards Code (CCR Title 24, Part 11 code) commonly referred to as the CALGreen Code, is a statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code went into effect January 1, 2023 (2022 CALGreen). The 2022 CALGreen standards continue to improve upon the existing standards for new construction of, and additions and alterations to, residential and nonresidential buildings.

Regional

South Coast Air Quality Management District Thresholds

The SCAQMD is the air pollution control agency for Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino Counties. The agency's primary responsibility is ensuring that CAAQS and NAAQS are attained and maintained in the SoCAB. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities. All projects are subject to applicable SCAQMD rules and

regulations in effect at the time of construction and operation. The following is the SCAQMD rule relevant to GHG:

- **Rule 1415 (Reduction of Refrigerant Emissions from Stationary Air Conditioning Systems)** – The purpose of this rule is to reduce emissions of high-global warming potential refrigerants from stationary air conditioning systems by requiring projects to reclaim, recover, or recycle refrigerant and minimize leakage.

Southern California Association of Governments

On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS. The RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals. The SCAG region strives toward sustainability through integrated land use and transportation planning. The SCAG region must achieve specific federal air quality standards and is required by state law to lower regional GHG emissions.

Local

City of Monterey Park General Plan

The City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City's General Plan includes a Sustainable Community Element, adopted in 2014, that contains the following policies specific to greenhouse gas emissions applicable to the Project:

Sustainability Community Element

Goal 9: Greenhouse gas emissions from energy production are minimized through reduced energy demand and expanded use of renewable energy sources.

Policy 9.1 Increased Energy Efficiency: Ensure high energy efficiency for all buildings through demonstration, education, and incentives.

Policy 9.3 Solar-Ready Roofs: For new construction and renovations, encourage builders to provide roofs that are solar panel-ready particularly commercial roofs.

City of Monterey Park Climate Action Plan ("CAP")

The City's qualified CAP, approved in 2012, provides the City's road map to reducing community GHG emissions associated with existing and future actions and activities. The CAP was adopted by the City Council on October 3, 2012. The CAP included baseline emissions inventory and projection of future emissions; establishing a community-wide reduction target for 2020 and

2035; identify strategies, actions, and measures to meet reduction targets; evaluate CEQA impacts of the proposed strategies; and monitor effectiveness of reduction measures and the CAP to changing conditions. The CAP establishes a policy to reduce the City's GHG emissions by 15 percent below baseline 2009 levels by 2020, and sets an aspirational goal of achieving GHG emissions 49 percent below baseline 2009 levels by 2035. The CAP does not include quantitative project-level CEQA thresholds or percentage reduction targets for individual projects.

The CAP includes numerous GHG reduction measures, split into five categories: Energy, Land Use, Transportation, Water, and State and Federal. The State and Federal measures would account for 67.9 percent reduction in GHG emissions. The remaining four categories are considered City measures. The complete list of GHG reduction measures is shared in Threshold (b) below. Generally, the purpose of the CAP is to establish measures capable of reducing GHG and promoting economic growth based on clean technology and sustainable practices.

Methodology

The Project's construction and operational emissions were calculated using CalEEMod. Details of the modeling assumptions and emission factors are provided in **Appendix G**. For construction, CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and applying the mobile-source and fugitive dust emissions factors derived from CalEEMod. The Project's construction-related GHG emissions would be generated from off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. The Project's operational-related GHG emissions would be generated by vehicular traffic, area sources (e.g., landscaping maintenance and consumer products), electrical generation demand, natural gas consumption, water supply and wastewater treatment, solid waste, water usage, and energy usage.

Impact Analysis

4.8a Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

4.8b Would the project conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Consistency with Applicable Plans and Policies

The Project would replace an older building that occupies the site currently and would be subject to compliance with all building codes in effect at the time of construction, which would include energy conservation measures mandated by Title 24 of the California Building Standards Code – Energy Efficiency Standards. Because Title 24 standards require energy conservation features in new construction (e.g., high- efficiency lighting, high-efficiency heating, ventilating, and air-conditioning ("HVAC") systems, thermal insulation, double-glazed windows, water conserving plumbing fixtures), they indirectly regulate and reduce GHG emissions. California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The most recent 2019 standards went into effect January 1, 2020. The 2022 Energy Code and associated Title 24 standards went into effect January 1, 2023.

Consistency with the City of Monterey Park Climate Action Plan

In 2012, the City adopted the CAP which sets forth a comprehensive strategy to address GHG emissions related to land use patterns, transportation, building design, energy use, water demand, and waste generation. The Project's consistency with the CAP is analyzed in **Table 4.8-1: City of Monterey Park Climate Action Plan Measures Consistency**.

Table 4.8-1: City of Monterey Park Climate Action Plan Consistency

Measure	Description	Consistency
Building Efficiency		
E1. Efficiency Requirements for New Developments	The City, in coordination with the California Building Standards Commission and the California Energy Commission, will adopt energy efficiency regulations for new construction projects that comply with the 2008 California Green Building Code Tier 1 energy efficiency standards. The Tier 1 energy efficiency standards require a building's energy performance to exceed Title 24 standards by 15 percent for both residential and nonresidential development.	**Consistent**: The proposed Project would comply with California Green Building Standards Code (CCR Title 24, Part 11 Code) (CALGreen) which requires new residential and nonresidential buildings to comply with mandatory measures including energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. The Project would be required to comply with the provisions of the CALGreen standards. In addition, the Project would have three EV charging spaces.
E2. Building Retrofits	31 percent of total GHG emissions in the City are a result of energy used for commercial and residential buildings. Since the vast majority of buildings in the City were built before 2002, there is tremendous potential to increase the overall energy efficiency of buildings in the City with a range of energy efficiency upgrades.	**N/A**: This is not applicable to the Project. The Project would demolish and remove the existing improvements and construct a new data center. As building standards and efficiency has improved since the construction of the original building the replacement structure would be more energy efficient.
E3. Appliance Upgrade	The City will partner with SCE, the SoCal Gas, and the Metropolitan Water District to provide to increase awareness about rebate and incentive programs, the efficiencies that	**Consistent:** The Project would utilize energy efficient appliances and comply with the latest Title 24 energy efficiency requirements. In addition, the Project would not include natural gas.

Table 4.8-1: City of Monterey Park Climate Action Plan Consistency		
Measure	**Description**	**Consistency**
	may be gained from Energy-Star-rated appliances, and the cost savings associated with Energy Star appliances.	
E4. Smart Meters	Emerging energy management systems or Smart Meters are currently being stalled by SCE as a means to improve how electricity consumption is managed. These Smart Meters will eventually provide utility customers with access to detailed and instantaneous energy use and cost information, new pricing programs based on peak-energy demand, and the ability to program home appliances and devices to respond to cost, comfort, and convenience.	**Consistent:** The Project's utility provider (SCE) would install smart meters upon development.
Increase Renewable Energy Generation		
R1. Solar Water Heating	Solar hot water systems are a simple, reliable, and cost-effective method for harnessing the sun's energy to provide hot water. Solar collectors, usually placed on the roof, absorb the sun's energy to heat water that is stored in a water tank. Although solar water heater upgrades require an up-front investment from the resident or business owner, there is a range of financing and rebate options available to offset these initial costs.	**N/A:** The Project plumbing is not designed to include a hot water system that requires water to be stored in a water tank. Thus, this measure is not applicable. In any case, the Project would include rooftop design that is photovoltaic-system ready, which would allow solar energy to be distributed to project demand.
R2. Solar Photovoltaic Systems	Solar photovoltaic (PV) systems generate electrical power by converting solar radiation into direct-current	**Consistent:** The Project would construct new buildings on the site that could accommodate limited solar photovoltaic systems on the roof to

Table 4.8-1: City of Monterey Park Climate Action Plan Consistency		
Measure	**Description**	**Consistency**
	electricity using semiconductors. PV systems can be retrofitted into existing buildings, usually by mounting them onto an existing roof structure or walls. The City will promote PV installations to provide 5 percent of residential electricity and 2 percent of commercial electricity energy use from solar PV generation by 2020.	offset overall energy demand. Due to rooftop mechanical equipment, and related screening elements to comply with code, the solar PV systems cannot not occupy the entire roof area. Approximately 45,000 square feet could accommodate future photovoltaic installation, which could result in a maximum output between 750 to 900 kilowatts of energy. Nonetheless, the Project would include rooftop building design that is compatible with a solar photovoltaic system on a portion of the roofed areas. Nonetheless, the Project would include rooftop building design that is compatible with a solar photovoltaic system on a portion of the roofed areas.
Land Use		
LU1. Mixed Use Development	Increasing the availability, effectiveness, and use of transit could result in a 0.5 percent reduction in overall vehicle miles travelled (VMT) in the City by 2020. To meet the VMT reduction target, the City will create additional incentives to build and actively facilitate new mixed-use development near existing and planned transit corridors.	**N/A:** This is a municipal measure and not Project specific. This measure is intended to encourage and incentivize mixed-use development, which is not applicable to the Project. It should be noted that the land use policies in the CAP encourage infill and redevelopment, which is relevant to, and consistent with, the Project as it redevelops and existing infill site instead of developing undeveloped land.
LU2. Service Nodes	Through changes proposed under the new Zoning Ordinance, the City will provide more opportunities for walking, biking, and short-distance vehicular trips by promoting service nodes, which are employment centers with eating establishments, coffee shops,	**N/A:** This is a municipal measure and not Project specific. Therefore, this measure is not applicable. It should be noted that the land use policies in the CAP encourage infill and redevelopment, which is relevant to, and consistent with, the Project as it redevelops and existing infill site instead of developing undeveloped land. It should also be noted that the

Table 4.8-1: City of Monterey Park Climate Action Plan Consistency		
Measure	**Description**	**Consistency**
	day care, dry cleaners, and other services in proximity.	site is in a voter-enacted zone, thus the City amendments to the zoning ordinance are inapplicable here unless voter-enacted.
Transportation		
T1.1 Increase Transit Use: Lower Cost of Riding Transit	The City currently provides discounts to older adults on the purchase of transit passes, which are accepted locally and by regional transit providers. Pending funding availability, the City will expand the program to provide discounts to resident groups, such as students, or increase the subsidy in order to further promote transit use.	**Consistent:** This is a municipal measure and not specifically applicable to the Project. However, T1 encourages the City to expand transit programs to provide discounted transit passes to certain groups. These transit passes and programs would likely be available to employees of the Project who qualify for the City programs, and choose to ride transit to work, and hence the Project is consistent with implementation of this policy.
T1.2 Increase Transit Use: Promote Use of Transit Network	Promoting the availability of local and regional transit options is necessary to increase awareness and ridership. Therefore, the City will develop marketing or outreach programs to promote the use of the Spirit Bus and other transit options. The potential for VMT reduction with implementation of this action is 1% by 2020.	**N/A:** This is a municipal measure and not specifically applicable to the Project. Therefore, this measure is not applicable. It should be noted that the Project is a low VMT generator and would be compatible with any program the City develops to increase awareness of regional transit options, which the employees of the Project may use.
T2.1 Increase Walking and Biking: Expand Pedestrian Network and Increase Bicycle Parking.	The City will focus on implementation of traffic-calming projects and other necessary pedestrian amenities and safety improvements to enable walking as an attractive travel mode. The City will also identify opportunities to install bicycle parking in public areas and work with local employers	**Consistent**: This is a municipal measure and not specifically applicable to the Project. However, the Project is consistent with this policy because it does improve the pedestrian realm by improving the frontages surrounding the Project Site.

Table 4.8-1: City of Monterey Park Climate Action Plan Consistency		
Measure	**Description**	**Consistency**
	to facilitate the expansion or provision of end-of-trip facilities.	
T2.2 Increase Walking and Biking Provide End-Of-Trip Facilities	The City will work with local employers to facilitate the expansion or provision of these facilities. As part of the outreach, the City will spotlight the facilities offered to its own employees, which includes bike racks at City Hall, and changing rooms, lockers, and showers for most employees. Research has shown that VMT can be reduced by 2% to 5% through end-of-trip facilities. With 50% of the travel within the City associated with commuting, this action can achieve 1% VMT reduction by 2020.	**N/A:** This is a municipal measure and not specifically applicable to the Project. Therefore, this measure is not applicable.
T3. Transportation Demand Management (TDM)	Transportation demand management (TDM) is a series of strategies that aim to reduce single-occupancy automobile trips. These strategies frequently target commute trips associated with employment within a community. Under this program, private companies with less than 250 employees would be encouraged, but not required, to implement a TDM program for their employees. The City will designate a TDM Coordinator who will promote these programs at local businesses, show case the current municipal program as an example, and encourage additional TDM at existing and future businesses.	**Consistent**: This is a municipal measure and not specifically applicable to the Project. In addition, the Project would have far fewer than 250 employees and therefore is not required to implement a TDM program. Nonetheless, the Project would not obstruct the efforts of the City's TDM Coordinator to promote TDM programs for local business, and as such is consistent with implementation of this policy by the City.

Table 4.8-1: City of Monterey Park Climate Action Plan Consistency		
Measure	**Description**	**Consistency**
Water Conservation and Waste Reduction		
W1. Conserving Water	The City, in partnership with the San Gabriel Valley Water District, will continue to develop pilot or demonstration projects related to water conservation. The City will continue to work with the Water District to complete irrigation and revegetation of medians throughout the City with water-efficient irrigation equipment and native vegetation.	**Consistent:** The proposed Project would include landscaping on the site which would consist of native trees, shrubs, grasses, and groundcover, all of which would have very low or low water needs. The Project would include water efficient appliances per City and State codes. In addition, the Project is designed to include data center cooling technologies that minimize water use.
W2. Reducing Waste	This program allows the City to meet the 50 percent landfill diversion mandate required by State law while providing a service to residents and businesses. In addition to the Materials Recovery Facility (MRF) program, the City has additional waste diversion and recycling programs, ranging from backyard composting/ smart gardening workshops to participation in County-wide Household Hazardous Waste collection events.	**Consistent:** The proposed Project would be served by the local solid waste collection and recycling service that diverts waste consistent with City and State recycling and diversion targets.
Source: City of Monterey Park, 2012, City of Monterey Park Climate Action Plan, https://www.montereypark.ca.gov/DocumentCenter/View/581/Climate-Action-Plan?bidId=. Accessed April 22, 2024.		

As shown in **Table 4.8-1,** the proposed Project is consistent with the applicable policies within the City's CAP.

Consistency with the 2022 Scoping Plan

For the State of California, the 2022 Scoping Plan Update sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The transportation, electricity, and industrial sectors are the largest GHG contributors in the State. The 2022 Scoping Plan Update plans to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and

trucks). Additional GHG reductions are achieved through decarbonizing the electricity and industrial sectors.

Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan Update include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy zero-electric vehicle buses and trucks. The 2022 Scoping Plan Update would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology. The Project would be compliant with CALGreen, including required number of EV chargers.

The 2022 Scoping Plan Update states that local CAPs that address the State's largest sources of emissions and prioritize transportation electrification, VMT reduction, and building decarbonization, contribute to the alignment between local climate action and the State's climate goals. As indicated above, the proposed Project would be consistent with the City's CAP. Further, project's GHG emissions associated with energy and mobile sources would be further reduced by the 2022 Scoping Plan Update measures described above. It should be noted that the City has no control over vehicle emissions, however, these emissions would decline in the future due to Statewide measures discussed above, as well as cleaner technology and fleet turnover. In addition, the Project generates minimal VMT and daily traffic trips due to a limited number of employees required to work at and service the data center. Thus, the Project does not create substantial GHG emissions from vehicles in any case.

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan.

As noted above, the thresholds of significance for purposes of CEQA review are consistency with the lead agency's applicable plans regarding reduction of GHG emissions. Nevertheless, for contextual purposes, the Project would not conflict with implementation of the 2022 Scoping Plan.

In conclusion, the Project would not conflict with an applicable plan, policy, or regulation of the lead agency adopted for the purpose of reducing GHG emissions. Therefore, the proposed Project would not result in significant effects.

Quantification of Project Emissions

Short-Term Construction Greenhouse Gas Emissions

The Project would result in direct emissions of GHGs from construction. Construction of the Project would result in direct emissions of CO_2, N_2O, and CH_4 related to the operation of construction equipment, and the transport of materials and construction workers to and from the Project site. The SCAQMD advises that construction GHG emissions be summed and amortized over the lifetime of a project (assumed to be 30 years), then the yearly amount be

added to the operational emissions.[36] The annual GHG emissions generated by construction of the Project is shown in **Table 4.8-2: Construction Greenhouse Gas Emissions.**

Table 4.8-2: Construction Greenhouse Gas Emissions	
Year	**$MTCO_2e$ per year**
Construction (2025)	511
Construction (2026)	471
Construction (2027)	361
Total	1,343
Amortized Over 30 Years	44.77
Source: CalEEMod version 2022.1. Refer to **Appendix G** and **Appendix A-2** for model outputs.	

As shown, the Project would result in the generation of a maximum of 511 $MTCO_2e$ and a minimum of 361 $MTCO_2e$ per year during construction, with an amortized 44.77 $MTCO_2e$ annually. The total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine the annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory. Once construction is complete, the generation of these GHG emissions would cease. Neither the City nor SCAQMD have an adopted threshold of significance for construction related GHG emissions. Therefore, GHG emissions related to construction were quantified and disclosed in this report for informational purposes only.

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions would occur over the life of the proposed Project. GHG emissions would result from area sources (consumer products, landscape maintenance equipment, and painting), vehicular traffic, and diesel fuel associated with the emergency generators. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

The Project electricity usage would be mainly from the operation of the data center. The purpose of a data center is to house computer servers, which require electricity and cooling 24 hours a day to operate. Based on data in the **Appendix E**, Peak Power Demand Estimate Memorandum, the Project during peak load conditions would have a demand of 49,999 kilowatts per hour (KW/h). The analysis assumes 24/7 operations (8,760 hours per year) which would result in a maximum electrical usage of 437,991 megawatt hours (MWh) per year, including CalEEMod default assumptions for lighting for surface parking. The modeling also conservatively assumed

[36] The amortization period of 30-years is based on the standard assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009).

the 14 gen-sets would be used for up to 50 hours per year per generator for testing and maintenance. The generators would utilize diesel fuel.

Power Usage Effectiveness During Operation

Power usage effectiveness (PUE) is a metric to calculate the ratio of total facility power over IT equipment energy. Total facility power is the amount of power the facility uses which includes data center hardware, power delivery components, cooling and lighting systems. Whereas IT equipment includes energy related to the storage and networking equipment, and control equipment. The ideal PUE is one (1) where all power drawn by the facility goes to the IT infrastructure. The average PUE in 2019 was 1.67.[37] The proposed Project is anticipated to have a blended PUE of 1.2 due to free cooling modules on the air-cooled chillers, below the average for data centers. The proposed Project would be more efficient than the average data center.

Total GHG emissions associated with the Project are summarized in **Table 4.8-3: Operational Greenhouse Gas Emissions Opening Year**. The Project Site includes an office building that has been vacant since 2016. While the Project conservatively does not take credit for the historical emissions, there was a use on site in 2012 when the CAP was being prepared for the City. Therefore, net emissions would be less than shown in the table.

Table 4.8-3: Operational Greenhouse Gas Emissions Opening Year

Emissions Source	**MTCO$_2$e per Year[1]**
Amortized Construction Emissions	44.77
Area Source	5
Emergency Generators [2]	2,062
Mobile	80
Waste	70
Water and Wastewater	27
Refrigeration	0.1
Energy[3]	83,020
Total Emissions	85,309

1. Total values are from CalEEMod and may not add up due to rounding.
2. Emergency backup generator emissions calculated assuming 50 hours per year per generator (14 generators) for annual GHG analysis; regulatory compliance permitting requirements would limit daily criteria pollutant levels.
3. The servers in the data center were estimated to require approximately 50 MW of power per hour, and operations were conservatively estimated to be 8,760 hours per year. Total MW per year would be 437,991. Total CO_2e in tons per year would be 83,020. The Project does not include natural gas heaters or water heaters.

Source: CalEEMod version 2022.1. Refer to **Appendix G** and **Appendix A-2** for model outputs.

As shown above in **Table 4.8-3**, the emissions related to electricity use by the data center is a majority of the emissions. SCE is the utility providing electricity to the Project site. SCE's carbon

[37] Uptime Institute, Annual Data Center Survey Results, 2019, https://datacenter.com/wp-content/uploads/2019/06/data-center-survey-2019.pdf. Accessed May 7, 2024.

intensity factor in 2022 was 552 lbs CO_2e/MWh which includes 33.2 percent eligible renewable energy in the power mix.[38] Emissions associated with the Project's electricity consumption occur at power production facilities which are covered entities under the State's Cap-and-Trade regulations, which limit total GHG emissions by covered sources with decreasing allocations, and are subject to the RPS standard requiring the GHG intensity of electricity production to decrease steadily. These regulatory schemes serve as the foundation for the State's goal of net neutrality in 2045. Likewise, the implementation of these Statewide measures, including but not limited to SCE procuring and delivery electricity from renewable energy sources result in an annual reduction of GHG emissions associated with operation of the Project.

The Cap-and-Trade program covers approximately 80 percent of California's GHG emissions.[39] The statewide limit on GHG emissions from the capped sectors (i.e., electricity generation, industrial sources, petroleum refining, and cement production) will decline every year, achieving GHG emission reductions throughout the program's duration. The passage of AB 398 in July 2017 extended the duration of the Cap-and-Trade program from 2020 to 2030. The Cap-and-Trade program was extended in 2015 to cover combustion of fossil fuels including transportation fuels used in California. Accordingly, GHG emissions associated with the electricity usage and mobile sources of most projects that are subject to CEQA are covered by the Cap-and-Trade program.

Table 4.8-4: Trend of Project Greenhouse Gas Emissions Related to State Mandates shows the Project emissions in the opening year 2027, in 2035, consistent with the City's CAP horizon, and in 2045, the year the State will meet its carbon neutrality goal. **Table 4.8-4** also highlights the reduction in mobile emissions as passenger vehicle fleets become cleaner and technology improves. The trends show a steady decrease in Project GHG emissions, consistent with the overarching goals of the State's 2022 Scoping Plan and the City's CAP.

Table 4.8-4: Trend of Project Greenhouse Gas Emissions Related to State Mandates

	Annual Emissions ($MTCO_2e$ per Year)[1]		
Emissions Source	**2027 (Project Opening)**	**2035 (CAP Horizon)**	**2045 (CA GHG Neutrality)**
Mobile	80	71	67
Area	5	5	5
Energy[2]	83,020	62,657	0
Water	21	18	0
Waste	70	70	70
Generators	2,062	2,062	2,062
Total	85,258	64,883	2,204

1. Total values are from CalEEMod and may not add up due to rounding.

[38] Southern California Edison, 2022 Power Content Label, https://www.energy.ca.gov/filebrowser/download/6072. Accessed April 22, 2024.
[39] California Air Resources Board, Cap-and-Trade Program: Frequently Asked Questions, September 2022. https://ww2.arb.ca.gov/sites/default/files/2022-09/nc-FAQ_CT.pdf. Accessed April 22, 2024.

2. The Project does not include natural gas. GHG emissions from electricity are shown to decline in accordance with State mandates and regulations including RPS standard that requires an increasing amount of renewable energy electric utilities procure to comply with the various goals including 50 percent eligible renewable energy resources in 2030. In line with the Governor's mandate emissions in 2045 are shown to achieve the carbon neutrality goal.

Source: CalEEMod version 2022.1. Refer to **Appendix G** for model outputs.

As shown above in **Table 4.8-3** and **Table 4.8-4**, the majority of GHG emissions associated with the Project is the electricity energy use (approximately 97 percent). Because GHG emissions from covered entities are accounted for in the State's GHG future inventories and reduction targets and are subject to existing regulatory schemes to reduce emissions, those emissions are considered consistent with the 2022 Scoping Plan Update.

The Project would include a variety of energy efficiency measures including all applicable City and State green building measures such as California Code of Regulations Title 24, Part 6 (Energy Code) and Part 11 (CALGreen). The Project is designed to minimize wasteful energy consumption, with a projected PUE much lower than the average achieved by data centers. In addition, the Project would be consistent with applicable CAP goals (discussed in detail above) aimed to reduce GHG emissions.

4.9 Hazards and Hazardous Materials

This Section is based on the Phase I Environmental Site Assessment ("ESA") (Partner Engineering and Science, Inc., April 2023), which is included in its entirety in **Appendix H: Phase I Environmental Site Assessment**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?		X		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
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?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

Impact Analysis

4.9a Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The Project involves the demolition of the existing buildings and surface parking lot and construction of the data center building, equipment yard, substation, parking, and landscaping. The Project would involve the use of common types of potentially hazardous materials such as cleaners, pesticides for landscaping, and diesel fuel for generators.

Use of these types of common materials does not create a significant hazard to the public and does not differ materially from the types of materials stored and used in traditional commercial and business operations. In addition, pursuant to MPMC Section 21.14.190(H), the Project would not routinely use a hazardous material that has a degree of hazard rating in health, flammability or reactivity of Class 4 as ranked by U.F.C. Standard 79-3 or succeeding standard. Truck trips to deliver diesel fuel and other hazardous materials are expected to reach the Project Site via SR 60, Saturn Street, Potrero Grande Drive, and possibly other local streets which connect the Project Site to nearby highways. All potentially hazardous materials used on the Project site would be contained, stored, and used in accordance with manufacturer's instructions and handled in compliance with applicable standards and regulations. In accordance with federal and State law, the Project would be required to disclose hazardous materials handled at reportable amounts. Additionally, the Project Applicant would be required to prepare an emergency response and evacuation plan, conduct hazardous materials trainings, and notify employees who work in the vicinity of hazardous materials, in accordance with federal Occupational Health and Safety Administration ("OSHA") and California Division of Occupational Safety and Health ("Cal OSHA") requirements. For transport and handling of fuel, Cal OSHA requirements include establishment of an Injury and Illness Prevention Program (CCR Title 8, Section 6760) and also specify design requirements for underground fuel storage tanks (CCR Title 8, Section 6807). Aboveground fuel storage tanks would be subject to all requirements set forth in HSC Chapter 6.67 (Sections 25270 to 25270.13).

The Los Angeles County Fire Department Health Hazardous Materials Division (Health Hazardous Materials Division) is the Certified Unified Program Agency ("CUPA") for the City. As the CUPA, the Health Hazardous Materials Division is authorized to implement the California Aboveground Petroleum Storage Act. The Health Hazardous Materials Division inspects facilities that store petroleum products in aboveground tanks for compliance with the Act and applicable sections of the federal Spill Prevention, Control, and Countermeasure ("SPCC") rule. Installation of aboveground tanks on the Project Site would be subject to this inspection, and Project operation would comply with all relevant regulations.

The Health Hazardous Materials Division also administers the California Accidental Release Prevention Program within the City. The program requires assessment of hazard potential from the storage of hazardous materials on-site and the implementation of a Risk Management Plan to minimize the risk of accidental release. The fuel storage tanks would pose a risk to soils if an accidental release of fuel occurred. A Risk Management Plan would be required for the Project to ensure the storage tanks are maintained and operated in a way that minimizes the risk of release. In the event of an accidental release, the Health Hazardous Materials Division would oversee required cleanup and remediation as required by local, State, and federal regulation. In addition, the MPMC require the Project to file a business materials usage and operations form with the Public Works Department before the approval of a certificate of occupancy. With implementation of the required permit conditions and regulatory controls outlined above, impacts related to the routine use, transport, or disposal of hazardous materials would be less than significant.

4.9b 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?

Less Than Significant Impact with Mitigation Incorporated.

Construction

Project construction would require digging and excavation that could result in the accidental release of hazardous materials. According to the Phase I ESA conducted for the Project Site, no recognized environmental conditions ("REC") were found on-site. No historical RECs ("HREC") were identified during the Phase I ESA. However, a controlled REC ("CREC") was identified on-site. The Project Site was previously recorded on the State Water Resources Control Board ("SWRCB") GeoTracker database as a Leaking Underground Storage Tanks ("LUST") Cleanup site for three historical underground storage tanks ("UST"). The three USTs operated to supply an on-site emergency generator system associated with the former tenants of the existing building. According to a soil sampling report prepared by AEM in December 2018, upon removal of the three USTs in 2018, residual concentrations of fuel constituents were not detected above their laboratory method reporting limits in any of the collected soil or groundwater samples. In April 2020, the Los Angeles County Department of Public Works issued a letter to the Los Angeles Regional Water Quality Control Board ("LARWQCB") that indicated their review of the 2018 soil sampling report and referral of the matter to the LARWQCB for further action. A letter prepared by the LARWQCB in June 2022 determined that, based on their review of the documentation, the low concentrations of the pollutants in the areas of the three historic USTs pose low threats to human health; therefore, no further action was required. Accordingly, the risk of hazard to the public or the environment through future upset conditions is low because the CREC identified on-site has been resolved to the satisfaction of the regulatory agencies.

Furthermore, the LARWQCB indicated that there may be residual concentrations of pollutants in the soil on-site that could pose an unacceptable risk as a result of future construction/redevelopment activities and/or change to a more sensitive land use from commercial use. Responsible parties, landowners, and contractors performing subsurface activities at the Project Site should be prepared to manage properly to avoid threats to human health or the environment. The Project does not change the use of land on the site to a more sensitive use, and instead transitions the type of building on the land from one commercial use to another type of commercial use. Also note that the historical USTs and closed LUST case are considered a CREC. Thus, based on the regulatory closure, reported removal of the identified USTs, completion of assessment and remedial activities, and indicated analytical results meeting the applicable regulatory standards for commercial use, the historical USTs and closed LUST case are considered a CREC, and no further action or investigation are warranted at this time.

Nonetheless, in an abundance of caution, and because construction activities for the Project would result in temporary ground-disturbing activities Project would implement **MM HAZ-1**, which would require preparation of a Soil Management Plan (SMP) to address potential soils with residual impacts remaining on the Project Site during future construction/redevelopment activities. With implementation of **MM HAZ-1**, impacts would be reduced to less than significant.

Furthermore, due to the age of the existing building (constructed in 1979), there is a potential that asbestos-containing materials (ACMs) are present. Additionally, during the on-site visit conducted for the Phase I ESA, readily visible suspect ACMs were observed in fair to good condition. Construction of the Project would demolish the existing building and remove any existing ACM pursuant to the applicable regulatory controls that ensure ACM is not released to the environment during the demolition process. Also, in compliance with OSHA standards, a comprehensive asbestos survey of the Project Site would be completed before demolition to determine the presence, condition, friability and likely future condition of suspect or confirmed ACM. All suspect materials would be handled as ACM according to local, State, and federal regulations until the results of sampling and analysis indicate the material is a non-ACM. Therefore, compliance with pertinent regulations regarding the handling and disposal of ACM would ensure that construction of the Project would result in a less than significant impact regarding ACMs.

Operation

Given the Project's nature, the emergency generators would not be used on a consistent or routine basis. Diesel leaks are unlikely, but should they occur, they would be contained within the enclosed generator housing, which is installed on a concrete pad, thus, any spilled diesel fuel could be cleaned up without significant hazard to the public or environment. The use of diesel generators for back-up energy supply is common for many commercial operations that require power reliability.

The CUPA administers inspection of businesses that use hazardous materials or generate hazardous waste and ensures compliance with federal and State regulations listed in Response 4.9a. Facilities that store, handle, or transport hazardous materials are required to procure businesses plans and adhere to strict procedures enforced by agencies with jurisdictions over those business plans. Those facilities must also adhere to strict procedures enforced by those agencies with jurisdiction over businesses or areas that routinely use or handle hazardous materials. Project operations would comply with all CUPA, U.S. EPA, and Department of Toxic Substances Control ("DTSC") Standards.

Routine maintenance would require diesel fuel for each generator, as discussed above in **Section 4.6: Energy**. Project operations are not expected to release any hazardous materials as a result of foreseeable upset and accident conditions. The use and storage of such materials would be required to continue to occur in compliance with applicable standards and regulations, and would not pose significant hazards. It is anticipated that the use of such hazardous materials would not create a significant hazard associated with a risk of upset or accident conditions involving the release of hazardous materials during Project operations. A less than significant impact would occur in this regard.

4.9c 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?

No Impact. The Project Site is not within one-quarter mile of an existing or proposed school. The nearest school is Hillcrest Elementary School located approximately 0.40-mile northeast of the Project Site. Therefore, the Project would result in no impact in this regard.

4.9d Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the DTSC. The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination, sites with known USTs having a reportable release, solid waste disposal facilities from which there is a known migration, hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program. The Project site is not identified on a compiled hazardous materials site list pursuant to California Government Code Section 65962.5. Therefore, no impact would occur.

4.9e 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?

No Impact. The Project Site is not located within or near an airport land use plan. The nearest airport is the privately-owned Whittier Air Strip located approximately 2.3 miles east of the Project Site in the City of El Monte. Therefore, the Project would not result in an airport-related safety hazard or excessive noise for people working in the Project area. No impact would occur in this regard.

4.9f Would the project impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is located in an established urban area that is well-served by an existing roadway network. According to the Los Angeles County Department of Public Works, SR 60, located approximately 0.4-mile south of the Project Site, is designated as a freeway disaster route. Garfield Avenue, located approximately 0.7-mile west of the Project Site, is designated as a disaster route.[40] These disaster routes would not be subject to any lane closures as a result of the Project. Construction activities, particularly those associated with infrastructure improvements, may encroach adjacent roadways and may require temporary and intermittent closure of the lane closest to the Project Site along Saturn Street. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially

[40] Los Angeles County Department of Public Works, City of Monterey Park, 2008, https://pw.lacounty.gov/dsg/DisasterRoutes/map/Monterey%20Park.pdf. Accessed February 7, 2024.

interfere with emergency response or evacuation plans, including the Los Angeles County Operational Area Emergency Operations Plan.[41] Furthermore, the Project would be designed according to applicable fire code standards and would provide adequate circulation and access to facilitate emergency response. Project design and access would be reviewed by MPFD to ensure that emergency access would be maintained. Therefore, the Project would not conflict with the City's adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

4.9g Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is in a fully urbanized area and it is not adjacent to any wildland. Additionally, according to the California Department of Forestry and Fire Protection (CAL FIRE), the Project Site is not within a State Responsibility Area (SRA) or a very high fire hazard severity zone (VHFHSZ); see **Section 4.20: Wildfire**. Therefore, the Project would not expose people or structures to a significant risk involving wildland fires. No impact would occur.

Mitigation Measures

MM HAZ-1 **Soil Management Plan.** Before the Building Official issues grading permits, a site-specific Soil Management Plan ("SMP") must be prepared by a qualified environmental professional approved by the City and submitted to the City of Monterey Park Building and Safety Division. The SMP must include the following elements, as applicable:

- Provisions for personal protection and monitoring exposure to construction workers,
- Requirements for construction workers to be Hazardous Waste Operations and Emergency Response ("HAZWOPER") trained,
- Procedures to be undertaken in the event that contamination is identified above action levels or previously unknown contamination is discovered,
- Procedures for the safe storage, stockpiling, and disposal of any impacted soils,
- Emergency procedures and responsible personnel.

[41] Los Angeles County, Operational Area Emergency Operations Plan, 2023, https://ceo.lacounty.gov/wp-content/uploads/2023/11/County-of-Los-Angeles-OAEOP-2023-Final-for-Website.pdf. Accessed February 16, 2024.

4.10 Hydrology and Water Quality

This Section is based on the Water Resources Technical Report (WRTR) (Fuscoe Engineering, Inc., May 2024), which is included in its entirety in **Appendix I: Water Resources Technical Report.**

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin?			X	
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.			X	
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			X	
(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			X	
iv) Impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Impact Analysis

4.10a Would the project violate water quality or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact.

Construction

The Project's construction-related activities would include demolition, excavation, grading, and trenching, which would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion and may allow eroded soils and other pollutants to enter the storm drain system. Construction projects of one acre or more are regulated under the CGP, Order No. 2022-0057-DWQ, issued by the SWRCB. Projects obtain coverage by developing and implementing a SWPPP estimating sediment risk from construction activities to receiving waters and specifying BMPs that would be used to minimize pollution of stormwater.

The Project's construction contractor would be required to prepare and implement a SWPPP and associated BMPs in compliance with the CGP during grading and construction activities. Typical construction BMPs include, but are not limited to, watering soil, soil cover of inactive areas, gravel bags, and fiber rolls. Project construction activities would also comply with the requirements of MPMC Chapter 6.30, Stormwater and Urban Runoff Pollution Prevention Controls, which requires stormwater and urban runoff pollution prevention controls.

Adherence to the BMPs in the SWPPP and requirements in the MPMC would reduce, prevent, minimize, and/or treat pollutants and prevent degradation of downstream receiving waters. BMPs identified in the SWPPP would reduce or avoid contamination of stormwater with sediment and other pollutants such as trash and debris; oil, grease, fuels, and other toxic chemicals; paint, concrete asphalt, etc.; and nutrients. Therefore, water quality and waste discharge impacts from Project demolition, grading, and construction activities would be less than significant.

Operation

Operation-related activities of the Project would generate pollutants that could adversely affect the water quality of downstream receiving waters if effective measures are not used to keep pollutants out of and remove pollutants from urban runoff. Requirements for waste discharges to stormwater from operation of developed land uses within the coastal watersheds of Los Angeles and Ventura Counties are in the Regional Phase I Municipal Separate Storm Sewer System NPDES Permit (MS4 Permit), Order NO. R4-2021-0105, issued by the LARWQCB in 2021. Los Angeles County has a LID Standards Manual on developing water quality management plans for projects and selecting stormwater control and source control BMPs in addition to other LID strategies. To meet the local MS4 permit and LID requirements consistent with the County's LID Ordinance and LID Standards Manual, stormwater management strategies would be implemented throughout the Project Site.

The LID Manual establishes an order of priority of LID BMPs when screening potentially feasible LID BMPs:

1. infiltration systems
2. stormwater capture and use
3. high efficiency biofiltration/bioretention systems, and
4. combination of any of the above.

According to the Geotechnical Investigation prepared for the Project, infiltration is not considered geotechnically feasible and is therefore not recommended. The next BMP strategy on the list, Capture and Use, is also not recommended by the WRTR as there are limited landscaped areas with appropriate water demand for the captured runoff to be directed to. The Project would therefore implement the next BMP strategy, biofiltration BMPs, in the form of six bioretention planter boxes along the western and eastern ends of the proposed data center building, that would be designed to accommodate an 85th percentile (0.9-inch), 24-hour storm. As the existing Project Site does not have any structural or LID BMPs on-site, implementation of the proposed LID features would significantly improve surface water quality runoff compared to existing conditions. Additionally, Project operation itself would not result in discharges that would cause regulatory standards to be violated in the Los Angeles River Watershed. Therefore, water quality and waste discharge impacts from Project operation would be less than significant.

For the reasons expounded above, Project impacts to water quality and waste discharge would be less than significant.

4.10b 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?

Less Than Significant Impact. The City overlies the Central Subbasin of the Los Angeles Coastal Plain Groundwater Basin. The Central Basin is divided into three sections: the Los Angeles Forebay, the Montebello Forebay, and the Whittier Area. The two forebays represent areas of unconfined aquifers that allow percolation of surface water down into the deeper aquifers to replenish the basins. The Whittier Area is a confined aquifer system that is replenished primarily from the upgradient forebays and adjacent groundwater basins.

The Project would not include any groundwater pumping and would instead rely on the local water purveyor for water. Additionally, no water supply wells are located at or within one thousand feet of the Project Site. The Project would not include the construction of any water supply wells, nor would the Project impact any existing water supply wells. Furthermore, as stated in Response 4.7a.iii, groundwater was not encountered in any of the exploratory borings performed on-site to the maximum depth of 36.5 bgs, and dewatering is not anticipated for the Project. The Project Site is also not within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge. Therefore, the Project would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that the Project would impede the basins' sustainable groundwater management, and impacts would be less than significant.

4.10c.i Would the project substantially alter the existing drainage pattern of the site or area, including through the alterations of the course of stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. See response to Response 4.10a, above. The construction contractor would be responsible for preparation and implementation of a SWPPP in compliance with LARWQCB's GCP. This includes maintenance of BMPs during the life of the Project and submittal of the annual reports.

Upon Project development, the Project would include LID biofiltration BMPs in the form of new bioretention planter boxes that would accommodate an 85th percentile (0.9-inch), 24-hour storm, consistent with the requirements of the MS4 Permit and LID Standards Manual. Compliance with existing regulations and BMPs developed to minimize erosion and siltation would reduce this impact to a less than significant level. Project infrastructure would connect to existing off-site storm drain infrastructure, and no upgrades or expansion of such off-site facilities would occur with Project implementation. Standard BMPs designed to prevent erosion during and after construction, as well as the introduction of pervious land uses in the Project Site, would slow stormwater runoff velocities and allow sediment to settle out of the water, and the nature of drainage patterns on the Project Site would capture trash and debris and restrict flow of debris into the storm drain system. Water runoff would be minimized to the extent possible, and the Project would comply with the requirements of the MS4 Permit. The Project would be designed to meet local, State, and federal water quality standards and to ensure that stormwater flows do not result in substantial erosion or siltation.

Therefore, post-development runoff would be adequately handled by the Project's drainage system and would not exceed the capacity of existing or planned stormwater drainage systems or substantially alter the existing drainage pattern of the Project Site or area in a manner that would result in flooding on- or off-site. Therefore, Project impacts would be less than significant.

4.10c.ii Would the project substantially alter the existing drainage pattern of the site or area, including through the alterations of the course of stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. See response to Response 4.10c.i, above.

Project development would decrease the amount of impervious surfaces on the Project Site from 66 percent to 62 percent. On-site runoff from the Project Site would be collected in the new bioretention planter boxes, which would accommodate an 85th percentile (0.9-inch), 24-hour storm. The WRTR includes an analysis of the 10-year, 25-year, and 50-year frequency design storm events for existing and proposed conditions; see **Table 4.10-1: Existing Versus Proposed Conditions for 10-Year, 25-Year, and 50-Year Storm Events**.

Table 4.10-1: Existing Versus Proposed Conditions for 10-Year, 25-Year, and 50-Year Storm Events		
10-Year Storm Event		
Condition	**% Imperviousness**	**Q_{10} (cfs)**
Existing	66	23.2
Proposed	62	21.4
25-Year Storm Event		
Condition	**% Imperviousness**	**Q_{25} (cfs)**
Existing	66	31.5
Proposed	62	28.8
50-Year Storm Event		
Condition	**% Imperviousness**	**Q_{50} (cfs)**
Existing	66	36.1
Proposed	62	34.4
Q = peak flow for the 10-year, 25-year, and 50-year storm events; cfs = cubic feet per second Source: Fuscoe Engineering, Inc., Water Resources Technical Report, 2024.		

Based on the results of **Table 4.10-1**, implementation of the Project would decrease the peak flow discharge for the 10-year, 25-year, and 50-year events as compared to existing conditions. Accordingly, the Project would not result in on- or off-site flooding.

Therefore, post-development runoff would be adequately handled by the Project's drainage system and would not exceed the capacity of existing or planned stormwater drainage systems or substantially alter the existing drainage pattern of the Project Site or area in a manner that would result in flooding on- or off-site, and impacts would be less than significant.

4.10c.iii Would the project substantially alter the existing drainage pattern of the site or area, including through the alterations of the course of stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As described above in Responses 4.10a and 4.10c.i, Project impacts on the capacity of storm drainage systems and stormwater pollution would be less than significant.

4.10c.iv Would the project substantially alter the existing drainage pattern of the site or area, including through the alterations of the course of stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Less Than Significant Impact. According to the WRTR, the Project Site is located within a flood hazard area identified by the Federal Emergency Management Agency (FEMA) as Zone X, which is defined as an area outside of the 0.2 percent (500-year) annual chance floodplain. However, the Project Site is located within the dam inundation area of the Garvey Reservoir. The Garvey Reservoir is a reservoir located approximately 0.4-mile north of the Project Site that is impounded by three embankment dams.

Garvey Reservoir is classified by the State Department of Water Resources, Division of Safety of Dams (DSOD) as an extremely high downstream hazard. However, as of September 2023, the

dam was given a Satisfactory Condition Assessment by the DSOD, and no existing or potential dam safety deficiencies were recognized.[42] Acceptable performance is expected under all types of loading conditions (static, hydrologic, seismic) in accordance with the minimum applicable State or federal regulatory criteria or tolerable risk guidelines. FEMA requires that all dam owners develop Emergency Action Plans (EAPs) for warning, evacuation, and post-flood actions. An EAP identifies potential emergency conditions at a dam and specifies actions to be followed to help minimize loss of life and property damage should those conditions occur. EAPs include procedures dam owners will follow to issue early warning and notification messages to responsible downstream emergency management authorities. EAPs also include inundation maps to help dam owners and emergency management authorities identify critical infrastructure and population-at-risk sites that may require protective measures, warning, and evacuation planning. Thus, the potential for dam flooding at the Project Site is considered low. Therefore, the Project would not impede or redirect flood flows, and impacts would be less than significant.

4.10d Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. As noted in Response 4.10c.iv, the Project Site is in an area of minimal flood hazard. Although the Project Site is within the dam inundation area of the Garvey Reservoir, as of September 2023, no existing or potential dam safety deficiencies were recognized, and acceptable performance is expected under all types of loading conditions. Thus, the potential for dam flooding at the Project Site is considered low.

Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. The Project Site is located approximately 22 miles inland from Pacific Ocean and is therefore not at risk of tsunami.

Seiches are large waves generated in enclosed bodies of water in response to ground shaking. There are two aboveground water tanks associated with the La Loma Reservoir located upslope of the Project Site to the northwest. Seiches have the potential to develop within the water tanks during seismic events. However, such tanks are required to be designed and constructed in compliance with the American Water Works Association Standards for Design of Steel Water Tanks to reduce the potential for seiches in water tanks where overflow or structural failure may result in damage to nearby properties. As the water tanks are designed in compliance with these design standards, the likelihood for seiches within the water tanks is low. Therefore, impacts regarding seiches are less than significant.

Based on the reasons above, the Project would not risk release of pollutants due to floods, tsunami, or seiche. Therefore, impacts would be less than significant.

[42] California Department of Water Resources, Division of Safety of Dams. Dams Within Jurisdiction of the State of California, 2023, page 36, https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/All-Programs/Division-of-Safety-of-Dams/Files/Publications/DAMS-WITHIN-JURISDICTION-OF-THE-STATE-OF-CALIFORNIA-LISTED-ALPHABETICALLY-BY-DAM-NAME-SEPTEMBER-2023.pdf. Accessed March 20, 2024.

4.10e Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As substantiated in Response 4.10a, through compliance with pertinent existing laws and regulations, the Project would not violate any water quality standards and therefore would not obstruct the implementation of a water quality control plan.

The Project Site is in the Los Angeles Coastal Plain Groundwater Basin, which is identified by the Sustainable Groundwater Management Act (SGMA) as a very low priority basin.[43] The SGMA requires only medium- and high-priority basins to form groundwater sustainability agencies, develop groundwater sustainability plans, and manage groundwater for long-term sustainability. Therefore, the San Gabriel Valley Basin does not require a sustainable groundwater management plan. Additionally, as further detailed in Response 4.10b, the Project would not decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, impacts would be less than significant.

[43] Sustainable Groundwater Management Agency, SGMA Data Viewer, https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#boundaries. Accessed March 21, 2024.

4.11 Land Use and Planning

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				X
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?				X

Impact Analysis

4.11a Would the project physically divide an established community?

No Impact. The Project Site is developed with a commercial office building, associated surface parking lot, and grass lot, and is surrounded by office, residential, and utility uses. No new streets or other physical barriers which could physically divide an established community are proposed. Although established residential neighborhoods lie to the north and west of the Project Site, Project development would not physically divide these neighborhoods in any way because the Project would be developed within the Project Site, and all off-site infrastructure improvements would be contained within roadways adjacent to the Project Site such that they would not transect those neighborhoods. Access to the existing residential neighborhoods would not be impeded or cut off as a result of Project development. Therefore, the Project would not physically divide an established community. No impact would occur in this regard.

4.11b 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?

No Impact.

General Plan

The Project Site has a General Plan land use designation of Innovation/Technology. The primary uses allowed within this land use designation include research and development, light manufacturing, service commercial, professional offices, entertainment, and breweries/wineries/distilleries. The General Plan states that the “Saturn Park district provides prime properties, easy access to arterial roadways and freeways, and locations near housing perfect for new, clean technology, and creative industries." The General Plan also states that “Saturn Park will continue to function as a business park focused on the office-type and research and development uses, with supportive commercial businesses.” The Project would develop a data center facility, which is a type of new clean technology industry, and is thereby consistent with the types of uses, and intent of, the General Plan for properties designated as Innovation/Technology.

In addition, the Project is consistent with the applicable goals and policies of the General Plan, including but not limited to the following. Goal 25: Saturn Park as a destination business park for high-quality service industry, research and development, and emerging industry jobs – aligns with the Project because it would redevelop a vacant parcel with a new emerging industry (data center) use that facilitates the goal of making Saturn Park a destination business park. In addition, the Project is consistent with Policy 25.2, which is to "market the Saturn Park district as a premier location in the San Gabriel Valley for emerging technology business" because the Project would redevelop the currently underutilized site with a quality emerging technology business. The Project proposes to develop a data center, which is a permitted use within the Innovation/Technology General Plan land use designation. Furthermore, the maximum FAR for the Innovation/Technology designation is 0.60. The proposed FAR for the Project is 0.32, which is below the maximum permitted FAR.

Further, Project development would not include or require any amendments to the General Plan. Finally, Project compliance with the General Plan would be verified through the City's development review process. Therefore, the Project would not conflict with the any of the City's land use plan, policies, or regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect, and no land use conflict related to General Plan consistency is expected to occur.

Zoning

The Project Site is zoned Office Professional (Voter Enacted) (O-P). Principal uses permitted in this zone include data processing facilities. The O-P Zone is intended to provide for the development of integrated professional, office and limited retail areas that exhibit a diversity of business activity from both revenue and service quality standpoints, and which are compatible and responsive to abutting land uses, including residential developments. The Project would be subject to compliance with the O-P development standards specified in MPMC Chapter 21.14, O-P – Office Professional Zone (Voter Enacted), which would be verified through the City's plan check review process. In addition, the Project is seeking a Development Agreement and activation of the BRDZ for the Project Site.

The Project would be required to provide 848 parking spaces per Table 21.22(C) of MPMC Section 21.22.120, Minimum Parking Spaces Required. As the projected number of employees would require far fewer parking spaces than what is prescribed in the MPMC, the Applicant is requesting a demand-based parking reduction. The reduced demand for on-site parking is a beneficial element of the Project because the Project generates far less vehicle trips than other commercial uses that could occupy the Site under the current zoning. Upon City approval, the Project would include 68 parking spaces adjacent to the eastern and northern sides of the proposed data center building. Similarly, the Applicant has requested a CUP for development on a lot size over one acre, and if needed, a CUP for mechanical equipment height, both of which are permitted by the MPMC. Also as permitted by the MPMC, the Development Agreement would contain zoning standards activated by the BRDZ for the Project characteristics analyzed herein.

Therefore, the Project would not conflict with the O-P Zone or BRDZ designation's intended uses and standards. Therefore, the Project would be consistent with the zoning of the Project site, and no land use conflict related to zoning consistency would occur.

Overall, the Project would be consistent with the land use and zoning of the Project Site, and no impact would occur.

4.12 Mineral Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				X
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?				X

Impact Analysis

4.12a 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?

4.12b 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?

No Impact. According to the California Geological Survey, the Project Site is within the San Gabriel Production-Consumption Region. However, the Project Site is not within a designated Resource Sector within the region, which are areas classified as containing significant aggregate resources (i.e., within Mineral Resource Zone 2) and not precluded from mining by incompatible land uses.[44] The entire City is urbanized, and past land use changes to accommodate planned urbanization preclude mining activities in the City. Furthermore, the City's General Plan does not include any locally-important mineral resource recovery sites.[45] Therefore, mining would not be feasible, and the City is not considered to be a potential future source for mineral resources. Additionally, the Project Site and immediate vicinity currently does not contain any active mining or drilling operations.[46,47] Therefore, the Project would not result in the loss of availability of a known mineral resource or a locally-important mineral resource recovery site. No impact would occur in this regard.

[44] California Geological Survey, Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California, 2010.
[45] City of Monterey Park, Monterey Park General Plan, Resources Element, 2001, https://www.montereypark.ca.gov/DocumentCenter/View/14211/Resources-Element?bidId. Accessed February 5, 2024.
[46] DOC, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/. Accessed February 5, 2024.
[47] DOC, Mines Online, 2016, https://maps.conservation.ca.gov/mol/index.html. Accessed February 5, 2024.

4.13 Noise

This Section is based on the *Noise and Vibration Analysis Memorandum* (Kimley-Horn, September 2024), which is included in **Appendix J: Noise and Vibration Analysis Memorandum**, and **Appendix A-2: Offsite Improvements for Southern California Service.**

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate 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?			X	
b) Generate of excessive ground borne vibration or groundborne noise levels?			X	
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?				X

Regulatory Setting

To limit population exposure to physically or psychologically damaging as well as intrusive noise levels, the Federal government, the State of California, various county governments, and most municipalities in the State have established standards and ordinances to control noise.

Federal

Federal Transit Administration Noise and Vibration Guidance

The Federal Transit Administration (FTA) has published the Transit Noise and Vibration Impact Assessment Manual (FTA Transit Noise and Vibration Manual) to provide guidance on procedures for assessing impacts at different stages of transit project development. The report covers both construction and operational noise impacts and describes a range of measures for controlling excessive noise and vibration. In general, the primary concern regarding vibration relates to potential damage from construction. The guidance document establishes criteria for evaluating the potential for damage for various structural categories from vibration.

State

California Government Code

California Government Code Section 65302(f) mandates that the legislative body of each county and city adopt a noise element as part of its comprehensive general plan. The local noise element must recognize the land use compatibility guidelines established by the State Department of

Health Services. The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable" noise levels for various land use types. Single-family homes are "normally acceptable" in exterior noise environments up to 60 CNEL and "conditionally acceptable" up to 70 CNEL. Multiple-family residential uses are "normally acceptable" up to 65 CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries, and churches are "normally acceptable" up to 70 CNEL, as are office buildings and business, commercial, and professional uses.

Title 24 – Building Code

The State's noise insulation standards are codified in the California Code of Regulations, Title 24: Part 1, Building Standards Administrative Code, and Part 2, California Building Code. These noise standards are applied to new construction in California for interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 65 dBA CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new multi-family residential buildings, the acceptable interior noise limit for new construction is 45 dBA CNEL.

Groundborne Vibration

Caltrans' *Transportation and Construction Vibration Manual* provides thresholds of vibration for building damage and human annoyance. Based on the Caltrans criteria, construction vibration impacts would be significant if vibration levels exceed 0.5 inches per second (in/sec) peak particle velocity (PPV) at older residential structures, which is the limit for potential building damage at these structures. For human annoyance, construction vibration impacts would be significant if vibration levels exceed 0.25 in/sec PPV at the nearest structure.[48]

Local

City of Monterey Park General Plan

The City of Monterey Park Noise Standards are developed from those of several federal and State agencies including the Federal Highway Administration (FHWA), the U.S. EPA, the Department of Housing and Urban Development (HUD), the American National Standards Institute (ANSI), and the State of California Department of Health Services. These standards set limits on the noise exposure level for various land uses. As with the California Noise Standards described above, these General Plan standards are related to the siting of land uses and are not typically used as thresholds of significance for determining noise impacts associated with construction and operation of the Project. However, the standards do provide a means for judging whether an existing noise environment would be compatible with development of a new noise-sensitive land use or whether a new use would create an incompatible noise environment for existing noise-sensitive uses. The General Plan does not have a Noise Element; however, the Safety Element

[48] Caltrans, Transportation and Construction Vibration Guidance Manual, 2020.

provides specific objectives to ensure that City residents will be protected from excessive noise. The other elements of the 2022 General Plan do not have policies related to noise or vibration. The following policies from the Safety Element are applicable to the Project:

Safety Element

Goal 12: Minimize the impact of point-source noises and ambient noise levels throughout the community.

Policy 12.1: Continue to enforce the noise regulations within the Monterey Park Municipal Code (MPMC) to control point-source noise.

Policy 12.2: Incorporate noise impact considerations into the development review process**,** particularly the relationship of parking and ingress/egress, loading, and refuse collection areas to surrounding residential and other noise-sensitive land uses.

Policy 12.4: Enforce and revise as necessary City regulations regulating hours for construction activity.

City of Monterey Park Municipal Code

MPMC Section 21.14.150, Compressors, Air-Conditioning Units or Similar Mechanical Equipment, requires that mechanical equipment located on the roof and outside of the exterior walls of the any building zoned in an office-professional zone must be installed with permanent sound-proofing measures and must comply with the noise standards set forth in Chapter 4.50, Regulation of Noise and Other Disturbances.[49] MPMC Chapter 4.50 has established noise standards for residential, commercial, and industrial uses. MPMC Section 4.50.080, Sound Level Limits – Established, states that ambient noise levels must not exceed the measured median ambient noise levels or the following presumed ambient noise levels identified in **Table 4.13-1: Established Sound Level Limits** below, whichever is greater:

Table 4.13-1: Established Sound Level Limits

Land Use	Time Period	Level
Residential	Nighttime	50 dBA
	Daytime	55 dBA
Neighborhood Commercial	Anytime	60 dBA
Other Commercial	Anytime	65 dBA
Industrial	Anytime	70 dBA

Source: City of Monterey Park Municipal Code Chapter 4.50 Regulation of Noise and other Disturbances.

MPMC Chapter 4.50, Regulation of Noise and Other Disturbances, provides specific noise restrictions and exceptions for noise sources within the City. MPMC Section 4.50.100, Sound Level Limits – Exceptions, states that construction activities between 7:00 A.M. and 7:00 P.M.

[49] MPMC Section 21.14.150 requires equipment to comply with standards set in MPMC Chapter 9.53. However, MPMC Chapter 9.53 was repealed, and Chapter 4.50 was added to regulate noise in the City during the Monterey Park City Council Meeting held on March 3, 2021.

Monday through Friday, and between 9:00 A.M. and 6:00 P.M. on Saturdays, Sundays, and Holidays are not subject to the noise level limits established in the MPMC.

Existing Conditions

Existing Noise Sources

Mobile noise sources, especially cars, trucks, motorcycles, and aircraft, are the City's most common and substantial noise sources. The existing mobile noise sources in the Project area are the motor vehicles traveling on Saturn Street, South Orange Avenue, and Potrero Grande Drive. The primary stationary noise sources in the Project vicinity are those associated with the surrounding industrial, commercial, and residential uses. Such stationary noise sources include mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] equipment and substation equipment), parking lot noise, moving vehicles, music playing, dogs barking, and people talking. The noise associated with these sources may represent a single-event noise occurrence or short-term noise.

Noise Measurements

To quantify existing ambient noise levels in the Project area, Veneklasen Associates conducted three short-term noise measurements and two long-term measurements on January 31, 2024; see Attachment B of **Appendix J**. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Project Site; see **Figure 4.13-1: Noise Measurement Locations**. The noise levels and sources of noise measured at each location are listed in **Table 4.13-2: Existing Noise Measurements**.

Table 4.13-2: Existing Noise Measurements

Site	Location	Average Level (dBA)	Daytime Level (dBA)	Nighttime Level (dBA)
ST-1	Southwest corner of the existing building on-site	64	-	-
ST-2	Northwest corner of the existing Project Site	64	-	-
ST-3	Southeast corner of the Project Site	65	-	-
LT-1	West edge of the Project Site by the residences along Iris Way	55	56	54
LT-2	Northeast corner of the Project Site by Orange Avenue	60	61	56

Source: Noise measurements taken by Veneklasen Associates, January 31, 2024.

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FIGURE 4.13-1: NOISE MEASUREMENT LOCATIONS
1977 Saturn Data Center Project
Initial Study/Mitigated Negative Declaration

NOT TO SCALE

Kimley»Horn

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Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect varying noise sensitivities associated with uses. As stated in the General Plan Safety Element, land uses considered sensitive receptors include residences, playgrounds, childcare centers, long-term health facilities, hospitals, schools, childcare facilities, and places of assembly. As shown in **Table 4.13-3: Sensitive Receptors,** sensitive land uses surrounding the Project consist of mostly residential communities to the north, east, west of the Project Site. To quantify noise exposure levels near the Project Site, the long-term noise measurement locations (see **Figure 4.13-1: Noise Measurement Locations**) were chosen for proximity to sensitive receptors including:

Table 4.13-3: Sensitive Receptors

Receptor Description	Distance and Direction[1]
Single-Family Residences	65 feet west
Single-Family Residences	165 feet northeast

1. Distance measured from the Project site boundary to the sensitive receptor property line.
Source: Nearmap, 2024.

Impact Analysis

4.13a Would the project result in generation 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?

Less Than Significant Impact.

Construction Noise

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction. Noise generated by construction equipment can reach high levels. During construction, exterior noise levels could affect the noise-sensitive receptors near the construction site. Construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coating. Such activities may require excavators, dozers, and concrete saws during demolition; tractors and dozers during site preparation; cranes, forklifts, generator sets, tractors, and welders during building construction; pavers, paving equipment, and rollers during paving; and forklifts, generator sets, welders, and air compressors during interior building construction. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Noise generated by construction equipment, including dozers, excavators, loaders, forklifts, and air compressors, can reach high levels. L_{max} is the maximum level of a noise source environment and is often used as a threshold value for typical noise levels of construction activities. Typical noise levels associated with individual construction equipment are listed in **Table 4.13-4: Typical Construction Noise Levels.**

Table 4.13-4: Typical Construction Noise Levels	
Equipment	**Typical Noise Level (dBA) at 50 feet from Source[2]**
Air Compressor	80
Auger/Drill Rig	84
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Mobile	83
Dozer	85
Dump Truck	77
Excavator	81
Generator	82
Grader	85
Jack Hammer	88
Loader	80
Paver	85
Pneumatic Tool	85
Pump	77
Roller	85
Saw	76
Shovel	82
Truck	84

1. Calculated using the inverse square law formula for sound attenuation: $dBA_2 = dBA_1+20Log(d_1/d_2)$
2. Where: dBA_2 = estimated noise level at receptor; dBA_1 = reference noise level; d_1 = reference distance; d_2 = receptor location distance.

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

Daytime construction noise is not typically a concern for human health and is a common occurrence within the urban environment. Construction activity between the hours of 7:00 A.M. and 7:00 P.M. Monday through Friday, and between 9:00 A.M. and 6:00 P.M. on Saturdays, Sundays, and Holidays are exempt from the MPMC noise standards. Although construction is not expected to occur outside of these times, a construction noise impact analysis, estimating the potential temporary increase in ambient noise, is performed in accordance with the FTA thresholds.

The Project's existing surroundings include both residential and commercial uses. Following the FTA methodology for quantitative construction noise assessments, FHWA's Roadway Construction Noise Model (RCNM) was used to predict construction noise. All construction

equipment is assumed to operate at the main construction area of the Project Site.[50] During construction, equipment would be operating throughout the Project Site and not all equipment would be operating at the point closest to the sensitive receptors. The main construction activity area for the Project would occur mainly around the center of the Project Site due to the building location and orientation. Therefore, the distance used in the model was approximately 530 feet from the center of the Project Site to the nearest sensitive receptor (adjacent to the Project Site to the west) and 380 feet to the nearest commercial receptor to the south; refer to **Appendix J** for construction noise modeling results. The MPMC does not establish quantitative construction noise standards, and Section 4.50.100(a) of the MPMC provides that construction activities are not subject to the noise level limits established in the MPMC. Nonetheless, for informational purposes only, this analysis conservatively uses the FTA's criteria of 80 dBA L_{eq} for residential uses and 85 dBA L_{eq} for commercial uses to evaluate construction noise impacts.[51]

Table 4.13-5: Construction Noise Level shows the maximum noise levels for each individual construction phase, assuming simultaneous use of equipment assumed for each phase. The highest exterior noise level at the residential use located to the west of the Project Site is estimated to be 67.1 dBA L_{eq}, which would not exceed the FTA's criteria of 80 dBA L_{eq} for residential uses. The highest exterior noise level during the offsite improvements at the residential use located to the north of the Project Site is estimated to be 72.0 dBA L_{eq}, which would not exceed the FTA's criteria of 80 dBA L_{eq} for residential uses. At the nearest commercial use approximately 380 feet south, the highest noise level would be 70.0 dBA L_{eq}, which would not exceed the FTA's criteria of 85 dBA L_{eq} for commercial uses.

Table 4.13-5: Construction Noise Levels

Construction Phase	Receptor Location			Modeled Exterior Noise Level (dBA L_{eq})[2,3]	Noise Threshold (dBA L_{eq})[4]	Exceeded?
	Land Use	Direction	Distance (feet)[1]			
Phase 1 Demolition	Commercial	South	380	68.8	85	No
Phase 1 Demolition	SFR	West	530	65.9	80	No
Phase 1 Demolition	SFR	Northeast	680	63.8	80	No
Phase 1 Site Prep	Commercial	South	380	70.0	85	No
Phase 1 Site Prep	SFR	West	530	67.1	80	No
Phase 1 Site Prep	SFR	Northeast	680	65.0	80	No
Phase 1 Grading	Commercial	South	380	69.7	85	No
Phase 1 Grading	SFR	West	530	66.8	80	No
Phase 1 Grading	SFR	Northeast	680	64.6	80	No
Phase 1 BC	Commercial	South	380	68.5	85	No
Phase 1 BC	SFR	West	530	65.6	80	No
Phase 1 BC	SFR	Northeast	680	63.4	80	No

[50] For the purposes of this analysis, the main construction activity areas are defined as the anticipated building construction area. Although some construction activities may occur at distances closer than 380 feet from the nearest properties, construction equipment would be dispersed throughout the Project Site during various construction activities. Therefore, main construction activity areas represent the most appropriate distance based on the sporadic nature of construction activities.

[51] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 7-3, page 179.

Phase 1 Paving	Commercial	South	380	68.9	85	No
Phase 1 Paving	SFR	West	530	66.0	80	No
Phase 1 Paving	SFR	Northeast	680	63.9	80	No
Phase 2 IC	Commercial	South	380	62.7	85	No
Phase 2 IC	SFR	West	530	59.9	80	No
Phase 2 IC	SFR	Northeast	680	57.7	80	No
Phase 2 Arch. Coating	Commercial	South	380	56.1	85	No
Phase 2 Arch. Coating	SFR	West	530	53.2	80	No
Phase 2 Arch. Coating	SFR	Northeast	680	51.1	80	No
Offsite Improvements	SFR	North	200	72.0	80	No

1. Distance is from the nearest receptor to the main construction activity area on the Project site. Not all equipment would operate at the closest distance to the receptor.
2. Modeled noise levels conservatively assume the simultaneous operation of all pieces of equipment.
3. The FTA Noise and Vibration Manual establishes construction noise standards of 80 dBA $L_{eq(8\text{-}hour)}$ for residential uses.

Abbreviations: SFR – Single-Family Residence, BC – Building Construction, IC – Interior Construction

Source: Federal Highway Administration, Roadway Construction Noise Model, 2006. Refer to Attachment A of **Appendix J** and Attachment A of **Appendix A-2** for noise modeling results.

Although the noise generated by Project construction would be higher than ambient noise levels, construction would be temporary and cease once Project construction is completed. Construction activities would comply with General Plan Policy 12.4 and MPMC Section 4.50.100, Sound Level Limits – Exceptions, and limit construction between the hours of 7:00 A.M. and 7:00 P.M. Monday through Friday, and between 9:00 A.M. and 6:00 P.M. on Saturdays, Sundays, and Holidays are exempt from the MPMC noise standards. While construction may cause short-term annoyance to adjacent uses, it would be temporary and restricted to the hours permitted by the City's noise ordinance. In any case, the MPMC exempts noise from construction activities from the noise level limits established in the MPMC. Therefore, construction noise impacts would be less than significant.

Operational Noise

Project implementation would introduce new noise sources in the Project vicinity. The Project's primary noise sources that could potentially impact nearby noise-sensitive land uses include, mechanical equipment (e.g., cooling equipment, generators, etc.), parking lot (daily arrival and departure of cars), and loading dock/truck noise. The Project's mechanical equipment noise modeling was analyzed in the Exterior Noise and Exterior Façade Acoustical Analysis provided by Veneklasen Associates (see Attachment B of **Appendix J**).

As indicated above, the MPMC Section 21.14.150, Compressors, Air-Conditioning Units or Similar Mechanical Equipment, limits noise levels generated by mechanical equipment to the measured median ambient noise level or the presumed ambient noise levels listed in **Table 4.13-1**, whichever is greater, per Chapter 4.50, Regulation of Noise and Other Disturbances.[52] As shown in **Table 4.13-2**, the ambient noise level at the nearest residences would be above the presumed ambient noise levels and therefore should be used as the ambient noise requirement for the site. The ambient noise requirement would be 56 dBA L_{eq} during the daytime and 54 dBA L_{eq} during

[52] As described above, Chapter 9.53 was repealed, and Chapter 4.50 was added during a Monterey Park City Council Meeting on May 3, 2021.

the nighttime for the single-family residences to the west, and 61 dBA L_{eq} during the daytime and 56 dBA L_{eq} during the nighttime for the single-family residences to the northeast. At the nearest commercial receptor, the presumed median ambient noise requirement would be 65 dBA L_{eq}.

Mechanical Equipment

Potential stationary noise sources related to long-term Project operations include mechanical equipment (e.g., chillers and generators). The modeling utilized the 2023 SoftNoise Predictor computer program to calculate noise due to the chillers and generators at the nearest receptors. Chiller units would be surrounded by a 16-foot absorptive barrier on the rooftop on the proposed Project building. The chiller units were conservatively modeled to operate for 24-hours at 100 percent capacity. The generators would be located outside along the north face of the building surrounded by a 20-foot precast screen wall. Generator noise would occur during generator testing (a monthly process by which each generator is started and run for short durations, typically 15-30 minutes, with only one generator being tested at a time; monthly testing would occur during daytime hours only) or during emergency situations (typically defined as the interruption of grid provided power during which up to 12 of the generators, depending on the demand of the data center, would provide electricity until grid power is restored). Section 4.50.050, Noise Disturbances – Exemptions, of the MPMC states that generators used during an emergency situation are exempt from the noise standards. Therefore, the noise levels generated for generators running during emergency situations were not evaluated.

As indicated in **Table 4.13-6: Mechanical Equipment Noise Levels**, noise levels from the different mechanical equipment operating scenarios would be below the ambient noise levels and would not exceed the City's standards. Therefore, the Project would result in less than significant impacts concerning mechanical equipment noise levels.

Table 4.13-6: Mechanical Equipment Noise Levels

Receptor	Project Operational Noise Level - Daytime (dBA L_{eq})[1]	Ambient Noise Level - Daytime (dBA L_{eq})[2]	Exceed?	Project Operational Noise Level - Nighttime (dBA L_{eq})	Ambient Noise Level - Nighttime (dBA L_{eq})[2]	Exceed?
Single Family Residences (West)	50	56	No	50	54	No
Single Family Residences (Northeast)	56	61	No	56	56	No
Commercial Use (Northeast)	55	65	No	55	65	No

1. Ambient daytime noise levels include the operations of the two generators closest to sensitive receptors for generator testing.
2. Per MPMC Section 4.50.080, the generated noise levels must not exceed the median ambient noise level at the receptors or the measured ambient noise level, whichever is greater.

Source: Refer to Attachment B of **Appendix J** for noise modeling results.

Loading Dock and Trash/Recycling Truck Pickups

During loading activities and trash and recycling pickups, noise would be generated by the trucks' diesel engines, exhaust systems, and brakes during low gear shifting' braking activities; opening and closing of the trash/recycling bins. The Project would have two loading docks and trash enclosures located in the northwest and northeast corner of the proposed Project building. The typical loading dock/trash pickup noise level is approximately 64 dBA L_{eq} at 50 feet. Truck loading and trash pickup would be infrequent and during the daytime hours. Therefore, on-site loading dock noise and trash/recycling pickup noise would not materially contribute to increases in daytime ambient noise. When weighted over a 12-hour period, truck loading/trash pickup noise would be 54 dBA L_{eq} at 50 feet. At the nearest sensitive receptor to the west and northeast, the noise level would be approximately 42 dBA L_{eq} and 38 dBA L_{eq} respectively without accounting for any surrounding attenuation features. The hours of deliveries and trash/recycling pickup activity would be dependent on the MPMC and the service provider. Therefore, the Project's truck loading/trash pickup noise level would not significantly impact the Project's contribution to the daytime ambient noise levels at the surrounding receptors and would result in less than significant impacts.

Mobile Traffic Noise

The Project is anticipated to generate 52 daily trips, with up to 36 trips during the day and up to 16 trips during the night.[53] In general, a 3-dBA increase in traffic noise is barely perceptible to people while a 5-dBA increase is readily noticeable. Traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to generate a barely perceptible 3-dBA increase.[54] Saturn Street is classified in the City General Plan Circulation Element as a Minor Arterial that supports up to 40,000 vehicles per day. According to Replica Traffic Data, Saturn Street currently carries 889 vehicles per day.[55] As noted above, the Project would result in approximately 52 daily trips, which would not result in a doubling of existing traffic volumes on Saturn Street, or nearby through streets. The Project would not generate enough traffic to result in a noticeable 3-dBA increase in ambient noise levels. Therefore, the Project would result in a less than significant impact from Project-related traffic noise.

Parking

Parking stalls would be located along the east of the proposed Project building. As explained above, the Project would not generate a substantial amount of trips and parking activities would be minimal on-site. Parking activities would anticipate a maximum of 18 vehicles during the day and 8 vehicles during the night.[56] Therefore, noise levels generated by Project parking would be at a 1-hour maximum of 39 dBA L_{eq} at 50 feet during the day and 35 dBA L_{eq} at 50 feet during the night. Due to the variability in parking throughout the day and night, when weighted over the daytime and nighttime periods, noise generated by parking would be even lower. Thus, vehicle

[53] Kimley-Horn and Associates, Transportation Analysis and Vehicle Miles Traveled Screening, 2024.
[54] According to the Caltrans, Technical Noise Supplement to Traffic Noise Analysis Protocol (September 2013), it takes a doubling of traffic to create a noticeable (i.e., 3 dBA) noise increase.
[55] Replica, Annual Average Daily Traffic, 2022.
[56] The Project anticipates a total of 26 employees with 18 employees available during the day and 8 employees during the night. Thus, the greatest amount of parking activity during the day or night would be 18 vehicles.

access would not significantly impact the Project's contribution to ambient noise levels at the nearby receptors and parking noise impacts would be less than significant.

Composite Noise

Exterior noise levels associated with mechanical equipment, truck loading/trash pickup, and the parking lot would contribute to Project's impact on the surrounding ambient noise levels. However, as described above, noise generated from truck loading/trash pickup and parking lot noise would not reach high levels when weighted over the daytime and nighttime periods. When combined with the Project's mechanical equipment contribution remains unchanged from those shown in **Table 4.13-6**. Therefore, the composite noise levels from the Project (chillers, truck loading, parking lot, and mobile noise) would be below the thresholds and the Project would comply with Chapter 4.50 of the MPMC. Thus, composite noise impacts associated with the operations of the Project would be less than significant.

4.13b Would the project generate excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Construction

Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction could result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Construction activities could occur as close as 65 feet from the nearest residential buildings. **Table 4.13-7: Typical Construction Equipment Vibration Levels** identifies vibration velocity levels at 25 feet and 65 feet for various types of equipment likely to operate at the Project Site during construction.

Table 4.13-7: Typical Construction Equipment Vibration Levels

Equipment	Peak Particle Velocity at 25 Feet (in/sec)	Peak Particle Velocity at 65 Feet (in/sec)
Vibratory compactor/roller	0.210	0.050
Large Bulldozer	0.089	0.021
Loaded Trucks	0.076	0.018
Small Bulldozer	0.003	0.001
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.		

The City has not adopted specific standards for vibration impacts during construction. Therefore, the Caltrans *Transportation and Construction Vibration Guidance Manual (2020)* is used to evaluate construction vibration impacts related to potential building damage. Based on the Caltrans criteria, construction vibration impacts would be significant if vibration levels exceed 0.5 in /sec PPV for building damage; and exceed 0.25 in/sec PPV for human annoyance in structures. As shown in **Table 4.13-7,** the vibration velocities at 65 feet from construction equipment could be up to 0.050 in/sec PPV at the nearest structure. Therefore, construction vibration would be well below and not exceed either the 0.25 in/sec PPV threshold for human annoyance or the 0.5

in /sec PPV for structural damage threshold for older structures. Thus, vibration impacts during Project construction would be less than significant.

Operations

The Project would not generate groundborne vibration during operations that could be felt at surrounding uses. Project operations would not involve railroads or substantial heavy truck operations, and therefore would not result in vibration impacts at surrounding uses. As a result, impacts from vibration associated with Project operation would be less than significant.

4.13c Would the project be 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?

No Impact. Refer to Response 4.9e. The nearest airport to the Project Site is the San Gabriel Valley Airport located approximately 5.1 miles northeast of the Project Site. The Project is not within 2 miles of the nearest airport and would not be impacted by airport noise. Additionally, there are no private airstrips located within the Project vicinity. Therefore, the Project would not expose people residing or working in the Project area to excessive airport- or airstrip-related noise levels, and no impact would occur.

4.14 Population and Housing

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Impact Analysis

4.14a 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)?

Less Than Significant Impact. The Project proposes to construct a data center and does not include the construction of residential uses. Project construction would temporarily increase the number of persons present at the Project Site. However, these construction workers would only be present at the Project Site during Project construction. Once operational, the Project would require approximately 26 employees, which are anticipated to be hired from the local population. Should Project-related employees relocate to the area, the local housing stock would be adequate to accommodate the additional workers. The Project would not result in a substantial increase in employment such that population growth could be induced directly or indirectly. Additionally, the Project does not propose the extension of new major infrastructure or uses that would indirectly induce substantial population growth. Therefore, impacts would be less than significant.

4.14b Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. There is no housing on the Project Site. Therefore, the Project would not displace existing people or housing, or require construction of replacement housing elsewhere. No impact would occur in this regard.

4.15 Public Services

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X

Impact Analysis

4.15a Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 fire protection?

Less Than Significant Impact. The Monterey Park Fire Department (MPFD) provides fire, rescue, and emergency services to the City. The closest fire station is MPFD Station 62 located approximately 0.7-mile west of the Project Site at 2001 Garfield Avenue. Project construction would require temporary lane closures on streets adjacent to the Project Site for utility relocation, delivery of materials, and sidewalk construction. However, Project construction would not require the complete closure of any public streets during construction, and temporary construction activities would not impede the use of the streets for emergencies or access for emergency vehicles. During temporary partial street closure, emergency access and traffic detours would be established in coordination with the City and would conform to City standards. Because the Project would not include housing or other uses that would induce substantial population growth in the area, the Project would not increase demand on fire protection providers such that new facilities are required.

The Project would be designed according to applicable fire code standards and would provide adequate circulation and access to facilitate emergency response during Project operation in accordance with City standards. The Project would provide two new driveways along Saturn Street. One driveway is proposed to be located along the western perimeter of the Project Site, and the other driveway is proposed to be located along the eastern perimeter of the Project Site. These new driveways would be located closer to the western and eastern boundaries of the Project Site compared to the existing driveways. Both driveways would connect to via an internal access lane which would also operate a fire access lane and provide an unobstructed width of 26 feet.

Furthermore, although construction activities would temporarily increase the number of persons present at the Project Site, these workers would only be present at the Project Site during construction of the Project. Once operational, the Project would introduce up to 26 employees. Because the Project would not include housing or other uses that would induce substantial population growth in the area, the Project would not increase demand on fire protection providers such that new facilities are required. Similarly, the Project replaces one commercial building with another commercial building, which would not increase the need for public services to maintain acceptable service ratios or response times. The Project would be designed according to applicable fire code standards and would provide adequate circulation and access to facilitate emergency response during Project operation in accordance with MPFD standards. Diesel transport, fueling, and operations would be subject to compliance with applicable federal, State, and local regulations identified in **Section 4.9: Hazards and Hazardous Materials.** The Project would result in a less than significant impact concerning fire protection services.

4.15b Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 police protection?

Less Than Significant Impact. The Monterey Park Police Department (MPPD) provides police protection services to the City. The MPPD is approximately 1.4 miles northwest of the Project Site at 320 West Newmark Avenue. As discussed in Response 4.15a, Project construction could encroach on adjacent roadways and temporarily impact street access and traffic flow. However, Project construction would not require the complete closure of any public streets during construction, and temporary construction activities would not impede the use of the streets for emergencies or access for emergency vehicles. During temporary partial street closure, emergency access and traffic detours would be established in coordination with the City.

During operations, the Project would include new security fencing enclosing the Project Site in addition to the existing perimeter fence. Two secured access gates would be provided, one for each proposed driveway. The access gates would remain locked, except during operations and maintenance activities. A pedestrian gate would also be located adjacent to the southern side of the proposed data center building that would provide access to the sidewalk along Saturn Street. The Project would also include security measures such as security lighting, a surveillance camera system, and 24/7 security personnel. The Project would temporarily increase the number of persons present at the Project Site that would only be present during construction activities, and up to 26 employees during operation. Because the Project would not include housing or other uses that would induce substantial population growth in the area, the Project would not increase demand on police protection providers such that new facilities are required. Similarly, the Project replaces one commercial building with another commercial building, which would not increase the need for public services to maintain acceptable service ratios or response times. The City has confirmed that a project of this nature would not be subject to police development impact fees. The Project would result in a less than significant impact concerning police protection services.

4.15c Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 schools?

No Impact. The Project would not include any residential uses. As mentioned, the Project would not induce population growth and thus would not increase the demand for school services. The Project would not require new or physically altered school facilities, therefore, would not result in adverse physical impacts in this regard. The Project would result in no impact concerning school facilities.

4.15d Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 parks?

No Impact. See Response 4.16 below.

4.15e Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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 other public facilities?

No Impact. Other public facilities such as libraries and hospitals are typically provided to serve residents within the City. Given the Project has no residential component, Project implementation would not increase demand for other public facilities such as libraries and hospitals. Therefore, the Project would not require new or physically altered public facilities such as libraries and hospitals and therefore would not result in adverse physical impacts in this regard. The Project would result in no impact concerning public facilities.

4.16 Recreation

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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?				X
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?				X

Impact Analysis

4.16a 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?

4.16b 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?

No Impact. The recreational facility nearest the Project Site is La Loma Park located approximately 135 feet northwest from the Project Site. Because the Project would not include housing or other uses that would induce substantial population growth in the area, the Project is not anticipated to increase the demand for existing recreational facilities or generate a demand for new ones. The limited number of employees during operation of the Project would not materially increase use of local recreation facilities. Further, Project implementation is not anticipated to increase the use of existing recreational facilities such that substantial physical deterioration of a facility would occur or be accelerated. The Project does not propose or require new or physically altered recreational facilities and therefore would not result in adverse physical impacts in this regard. No impact would occur.

4.17 Transportation

This Section is based on the *Transportation Analysis and Vehicle Miles Traveled Screening Memorandum* (Kimley-Horn, April 2024), which is included in **Appendix K: Transportation Analysis and Vehicle Miles Traveled Screening Memorandum.**

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycles, and pedestrian facilities?				X
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?			X	
d) Result in inadequate emergency access?			X	

Impact Analysis

4.17a Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

No Impact. Regional access to the Project Site would be provided via SR 60, I-10, SR 164, and I-710, located approximately 0.4-mile south, 2.1 miles north, 2.8 miles east, 3.1 miles west of the Project Site, respectively. Local access to the Project Site is provided via Saturn Street to the south.

Local bus service is provided by the Monterey Park Spirit Bus Route 5 on Saturn Street. There are no designated bicycle paths within the vicinity of the Project Site, and the Project would not preclude implementation of any bike routes identified in the City Circulation Element of the General Plan. Pedestrian access, which would remain upon buildout, is provided via an existing sidewalk along the portion of Saturn Street that abuts the southeastern portion of the existing commercial office building. The Project would enhance walkability by constructing new pedestrian sidewalk areas along the Project Site frontage. Pedestrian access within the Project Site would also be provided via a walkway along the western, southern, and eastern sides of the data center. A pedestrian gate with sidewalk connection to the public right-of-way would be provided on Saturn Street west of the new eastern driveway.

The proposed Project would not conflict with any adopted policies, plans, or programs regarding alternative transportation because no changes to existing transportation policies, plans, or programs would result from Project implementation. Therefore, the Project would result in no impact in this regard.

4.17b Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. CEQA Guidelines Section 15064.3 codifies the change from level of service to VMT as a metric for transportation impact analysis. Pursuant to SB 743, VMT analysis is the primary method for determining CEQA impacts. According to CEQA Guidelines Section 15064.3(a), VMT refers to the amount and distance of automobile travel attributable to a project. The City adopted their Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment (Transportation Study Guidelines) (September 2020) to provide transportation analysis requirements for land development, roadway projects, and specific plans in the City. As stated within the Transportation Study Guidelines, there are three types of screening that may be applied to effectively screen projects from project-level assessment. A project may be screened out of VMT analysis if it meets one or more of the following screening steps: (1) Transit Priority Area (TPA) Screening; (2) Low VMT Area Screening; or (3) Project Type Screening.

As shown in **Appendix K**, there will be 26 employees at the building throughout the day, with 18 employees available during the day and 8 employees available during the night. The 26 employees at the Project per day equates to a total of 52 daily vehicle trips. The Project itself is not an employee-intensive use and therefore does not generate a material number of daily vehicle trips or VMT. The 26 employees at the Project per day equates to a total of 52 daily vehicle trips, which is far less than the 110 daily vehicle trips threshold set forth in the Transportation Study Guidelines for project-type screening analysis. As such, the Project would meet one of the screening criteria identified in the City's Transportation Study Guidelines. Therefore, the Project is presumed to have a less-than-significant transportation impact and qualifies for being screened out from further VMT analysis. Impacts would be less than significant.

4.17c 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)?

Less Than Significant Impact. Vehicular access is currently provided via two driveways off Saturn Street, one each off the eastern and western boundaries of the Project Site. Vehicular access to the Project Site would be provided via two new gated driveways located along Saturn Street. One driveway is proposed to be located along the western perimeter of the Project Site, and the other driveway is proposed to be located along the eastern perimeter of the Project Site. These new driveways would be located closer to the western and eastern boundaries of the Project Site compared to the existing driveways. These two driveways would connect with each other along the northern side of the proposed equipment yard. The driveway along the eastern perimeter of the Project Site would serve as the main entry to the Project Site for passenger and service vehicles. Additionally, an internal, 26-foot-wide drive aisle would be included for general circulation and fire access. The designs and dimensions of the driveways would be designed to comply with the City's current design requirements. The Project would not have the potential to increase hazards due to geometric design. Thus, the Project does not propose any improvements

with potential to increase hazards due to incompatible uses. The Project would result in a less than significant impact in this regard.

4.17d Would the project result in inadequate emergency access?

Less Than Significant Impact. See Response 4.9f.

4.18 Tribal Cultural Resources

This Section is based on AB 52 communications initiated by the City; see **Appendix L: Assembly Bill 52 Communications**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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				
i) 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		X		
ii) 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.		X		

Impact Analysis

4.18a.i Would the project cause a substantial adverse change in the significance of a tribal cultural resource, 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)?

4.18a.ii Would the project cause a substantial adverse change in the significance of a tribal cultural resource- 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?

Less Than Significant With Mitigation Incorporated. Chapter 532 Statutes of 2014 (i.e., Assembly Bill 52 (AB 52)) requires that lead agencies evaluate a project's potential impact on "tribal cultural resources," which include "[s]ites, features, places, cultural landscapes, sacred places, and

objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives lead agencies the discretion to determine, based on substantial evidence, whether a resource qualifies as a "tribal cultural resource." In compliance with PRC Section 21080.3.1(b), the City provided formal notification to California Native American tribal representatives identified by the California NAHC. Results of the Sacred Lands File Search conducted with the NAHC were positive, and the NAHC recommended further consultation with the Gabrieleno Band of Mission Indians-Kizh Nation in accordance with AB 52.

The City contacted the tribal representative of the tribe noted below pursuant to AB 52 requirements. Correspondence to and from the tribal representative is included in **Appendix L**.

- **Fernandeño Tataviam Band of Mission Indians**, Sarah Brunzell
- **Gabrieleno Band of Mission Indians-Kizh Nation**, Andrew Salas
- **Gabrieleno/Tongva San Gabriel Band of Mission Indians**, Anthony Morales
- **Gabrielino/Tongva Nation**, Sandonne Goad
- **Gabrielino Tongva Indians of California Tribal Council**, Robert Dorame
- **Gabrielino Tongva Indians of California Tribal Council**, Christina Conley
- **Gabrielino-Tongva Tribe**, Charles Alvarez
- **Santa Rosa Band of Cahuilla Indians**, Lovina Redner
- **Soboba Band of Luiseno Indians**, Joseph Ontieros
- **Soboba Band of Luiseno Indians**, Isaiah Vivanco

The City received a response from the Fernandeño Tataviam Band of Mission Indians on June 10, 2024 stating that they would not be requesting consultation pursuant to AB 52 for the Project. To date, no other responses from the Native American Tribes have been received as part of the AB 52 tribal consultation effort.

As discussed in Response 4.5b, an on-site pedestrian survey conducted in February 2024 did not identify artifacts or potential for significant buried remains. No other cultural resources (including prehistoric or historic archaeological or historic architectural resources) were identified during the field survey. Disturbances associated with previous excavation and construction of the existing commercial office building at the Project Site have been severe and have disrupted soil beyond depths at which buried cultural resources are likely. Therefore, the potential to encounter in-situ remains associated with significant archaeological materials during Project activities is low. Nevertheless, ground-disturbing activities have the potential to reveal buried deposits not observed on the surface during previous surveys. Therefore, the potential exists for the Project to result in a substantial adverse change in the significance of a previously unidentified Native American tribal cultural resource. With implementation of **MM TCR-1** through **MM TCR-3**, potential impacts to tribal cultural resources would be less than significant.

Mitigation Measures

MM TCR-1 The Project Applicant must retain a professional Native American monitor from or approved by a consulting Tribe. The monitor will be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. If cultural resources are encountered, the Native American monitor will have the authority to request ground disturbing activities cease within 50-feet of discovery to assess and document potential finds in real time. Monitoring activities will cease when potential for significant buried resources have been exhausted (e.g., at the completion of construction excavation activity), as determined by the Qualified Archaeologist and in consultation with the Native American monitor. The Native American monitor and archaeological monitor will be present during construction excavation activity. Personnel needs would be determined during a pre-construction meeting.

MM TCR-2 If significant Pre-Contact (predating Native American contact with Europeans) and/or Post-Contact (postdating Native American contact with Europeans) cultural resources are discovered and avoidance cannot be ensured, the qualified archaeologist must develop a treatment plan, the drafts of which will be provided to the City for review and approval, as detailed within MM CUL-1.

MM TCR-3 The Applicant must, in good faith, consult with the Tribe or Tribal Government that requested consultation under AB 52 retained Native American monitor on the disposition and treatment of any artifacts or other cultural materials if encountered during the Project grading.

4.19 Utilities and Service Systems

This Section is based on the *Water and Sewer Infrastructure Report* (Fuscoe Engineering, Inc., May 2024), which is included in its entirety in **Appendix M-1: Water and Sewer Infrastructure Report** and **Appendix M-2: Water Efficiency Memorandum.**

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded facilities concerning the following, the construction or relocation of which could cause significant environmental effects? i. Water, ii. Wastewater, iii. Wastewater Treatment, iv. Stormwater Drainage, v. Electric Power, Natural Gas, and Telecommunications.			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
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 projected demand in addition to the provider's existing commitments?			X	
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?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Impact Analysis

4.19a.i Would the project require or result in the relocation or construction of new or expanded facilities concerning water, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The City of Monterey Park Public Works Department, Engineering Division owns and maintains all water infrastructure within the City, including on-site and off-site facilities. The Project Site is currently served by an existing 12-inch water main running south on Orange Avenue to Saturn Street and an existing 12-inch water main running west on Saturn Street

to Atlas Avenue/Portrero Grande Drive. There is also an existing 8-inch water line running east from the intersection of Orange Avenue and Saturn Street to Potrero Grande Drive.

The City also owns and maintains on-site water infrastructure within an easement. There is an existing City-owned 12-inch water line on-site starting at the southerly drive entry and running north through the northern property line. There is also an existing City-owned 8-inch water line that tees off the existing 12-inch line and runs east through the Project Site and then southeasterly through the northerly drive entry to connect back with the 12-inch line in Saturn Street.

There are also currently three public on-site fire hydrants within an easement, and four public off-site fire hydrants surrounding the Project Site. All on-site and off-site hydrants are owned and maintained by the City.

During construction, water will be required intermittently for dust control, equipment cleaning, soil grading and preparation during the early phases of the Project. The latter phases of construction normally require less water usage. Since water usage during construction is typically less demanding than the water usage for the proposed Project, it is anticipated that existing water infrastructure would meet the limited, temporary water demand associated with construction of the Project, and that the water purveyor is able to provide water during construction.

It is anticipated that the Project may require construction of new lateral connections (services) to existing water lines and/or relocation of the existing 8-inch waterline within the site. Construction impacts associated with the installation of water services would primarily involve trenching in order to place the lines sufficiently below the ground surface. When considering impacts resulting from the installation of any required water infrastructure, all impacts are of a relatively short-term duration (i.e., weeks to months) and would cease to occur once the installation is complete. Installation of new or relocation of existing water infrastructure will be limited to on-site water distribution, and minor off-site work associated with connections to the public main. No upgrades to public water mains, other than onsite infrastructure, are anticipated. Before ground disturbance, Project contractors would coordinate with the City to identify the locations and depth of all lines.

Table 4.19-1: Estimated Existing Water Demand shows the estimated existing water demand for the Project Site. The existing water demand assumes 120 percent of the Los Angeles County Sanitation Districts (LACSD) wastewater generation factors. This estimate is appropriate to account for any additional water demand for possible minor losses on-site, such as water use due to human consumption (cooking, drinking, watering indoor plants, evaporation), that would deviate from the LACSD sewage generation factors. The Estimated Total Water Usage (ETWU) equation is used for landscaping which is assumed to be 30 percent of the Project Site. The ETWU calculation for landscaping is included in the Water and Sewer Infrastructure Report.

Table 4.19-1: Estimated Existing Water Demand			
Land Use	**Square Footage (SF)**	**Estimated Average Daily Sewage Flow Factor (gal/1,000 SF gross area)[1]**	**Total Water Demand (gpd)**
Building 1 (2-story; office)	41,100	240	9,864
Building 1 (2-story; utility)	164,528	30	4,936
Building 2 (utility)	3,936	30	118
Landscaping[2]	206,867	ETWU Method	14,151
Total Existing Water Demand to be Removed			**29,069**

gal = gallon, SF = square foot, gpd = gallons per day
1. Based on 120 percent of the sewer generation factors from the "Loading for each class of land use" from LACSD.
2. Demand based on ETWU equation: (Eto*plant factor*landscaped area* 0.62)/irrigation efficiency. Utilizing CIMIS Reference Evapotranspiration Zones Map ET of 46.6 in/yr, and a conservative plant factor of 0.7 and irrigation efficiency of 0.81 proposed condition.

Source: Fuscoe Engineering, Water and Sewer Infrastructure Report, 2024.

Table 4.19-2: Estimated Proposed Water Demand shows the Project's estimated proposed water demand. Similar to how existing water demand was calculated, the Project's estimated proposed water demand was also calculated using 120 percent of LACSD wastewater generation factors as well as the ETWU equation for proposed landscaping. Proposed landscaping was assumed to comprise 30 percent of the Project Site (similar to existing conditions). As shown below in **Table 4.19-2**, the Project's estimated water consumption is approximately 33,031 gpd, resulting in a net increase of approximately 3,962 gpd compared to existing conditions.

Table 4.19-2: Estimated Proposed Water Demand			
Land Use	**Square Footage (SF)**	**Average Generation Factor (gpd/1,000 SF)[1]**	**Total Water Demand (gpd)**
Data Hall Center[2]	109,970	30	3,299
Office (Network)[3]	1,750	240	420
Office (Support)[3]	26,700	240	6,408
Office (Circulation)[3]	16,542	240	3,970
Ancillary (Elec.)[2]	23,976	30	719
Ancillary (Mech.)[2]	39,463	30	1,184
Substation (Service)	24,000	120	2,880
Landscaping[3]	206,867	ETWU Method	14,151
Total Proposed Water Demand			**33,031**
Total Existing Water Demand to be Removed			29,069
Project Net Water Demand			**3,962**

gpd = gallons per day, SF = square foot
1. Based on 120 percent of the sewer generation factors from the "Loading for each class of land use" from LACSD.
2. Assumes 'Warehouse' will be used for Data Hall Center, Mechanical Area, Electrical Area from LACSD. The Applicant's mechanical, electrical, and plumbing (MEP) engineer estimated the data hall center would have a baseline (using standard efficiency fixtures) water demand of approximately 75,340 gallons per year (gpy) (207 gpd). The design case (progressive

fixtures) water demand would be approximately 45,180 gpy (124 gpd). Therefore, the estimate provided based on LACSD (3,299 gpd for the data hall center) is conservative. See also **Appendix M-2: Water Efficiency Memorandum.**
3. Assumes 'Office Building' will be used for Office areas.
4. Assumes 'Service Station' will be used for Electrical Substation.
5. Demand based on Estimated Total Water Use equation: (Eto*plant factor*landscaped area* 0.62)/irrigation efficiency. Utilizing CIMIS Reference Evapotranspiration Zones Map ET of 46.6 in/yr, and a conservative plant factor of 0.7 and irrigation efficiency of 0.81 proposed condition.

Source: Fuscoe Engineering, Water and Sewer Infrastructure Report, 2024.

According to the Water and Sewer Infrastructure Assessment Report, when analyzing for infrastructure capacity, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure. Based on an analysis of the Project Site's fire demands and review of the resulting residual pressures from the Tait Assessment of Water Availability (included as Attachment C in the Water and Sewer Infrastructure Report), it has been determined that the existing water system at the Project Site is more than adequate to handle the demands for fire suppression. Furthermore, the relocation for the existing 8-inch water line within the Project Site is nearly negligible in terms of system pressure loss and will not adversely affect the public water system. Adequate fire flows can be provided to the Project by the existing and rerouted water infrastructure.

For the reasons listed above, the Project would not require or result in the relocation or construction of new or expanded water facilities. Impacts would be less than significant, and no mitigation is required.

4.19a.ii Would the project require or result in the relocation or construction of new or expanded facilities concerning wastewater, the construction or relocation of which could cause significant environmental effects?

4.19a.iii Would the project require or result in the relocation or construction of new or expanded facilities concerning wastewater treatment, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The City is within the jurisdictional boundaries of Sanitation Districts of Los Angeles County Sanitation District (LACSD) No. 2. Wastewater generated by the Project would be conveyed to existing City-owned sewer lines located in Saturn Street via proposed lateral sewer connections, which would then tie into one of LACSD's regional trunk sewers crossing through LACSD. Wastewater from the Project Site would be treated at the A.K. Warren Water Resource Facility (Warren Facility) in the City of Carson. The Warren Facility, owned and operated by LACSD, currently provides primary and secondary treatment for a design capacity of 400 million gallons of wastewater per day (mgd), and an average flow of approximately 237 mgd.

Construction activities for the Project could result in temporary wastewater generation on-site. However, such generation would be temporary when compared with the wastewater generated by the Project. In addition, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to direct wastewater flows to the City's wastewater

system. Thus, wastewater generation from Project construction activities is not anticipated to cause any measurable increase in wastewater flows.

Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure will be limited to on-site wastewater distribution and minor off-site work associated with lateral connections to the existing City sewer main. Any work that may affect services to the existing sewer lines or impacts to LACSD facilities or plant will be coordinated with the City's Public Works Department, Engineering Division. Furthermore, construction management and access plans would ensure safe pedestrian access as well as emergency vehicle access and safe vehicle travel. Moreover, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration and would cease to occur once the installation is complete.

Table 4.19-3: Estimated Existing Wastewater Generation shows the estimated existing wastewater generation for the Project Site, based on existing Project Site conditions and using LACSD wastewater generation factors.

Table 4.19-3: Estimated Existing Wastewater Generation

Land Use	Square Footage (SF)	Estimated Average Daily Sewage Flow Factor (gal/1,000 SF gross area)	Total Wastewater Generation (gpd)
Building 1 (2-story; office)	41,100	200	8,220
Building 1 (2-story; utility)	164,528	25	4,113
Building 2 (utility)	3,936	25	98
Total	**209,564**		**12,432**

gal = gallon, SF = square foot, gpd = gallons per day
Source: Fuscoe Engineering, Water and Sewer Infrastructure Report, 2024.

As shown in **Table 4.19-4: Estimated Proposed Wastewater Generation**, consistent with the proposed uses and LACSD's generation factors, the Project's projected wastewater generation is approximately 15,734 gpd, representing a net increase in wastewater generation at the Project Site of approximately 3,302 gpd.

Table 4.19-4: Estimated Proposed Wastewater Generation

Land Use	Square Footage (SF)	Average Generation Factor (gpd/1,000 SF)[1]	Total Wastewater Generation (gpd)
Data Hall Center[2]	109,970	25	2,749
Office (Network)[3]	1,750	200	350
Office (Support)[3]	26,700	200	5,340
Office (Circulation)[3]	16,542	200	3,308
Ancillary (Elec.)[2]	23,976	25	599
Ancillary (Mech.)[2]	39,463	25	987
Substation (Service)	24,000	100	2,400
Total Proposed Wastewater Flow			**15,734**
Total Existing Wastewater Flow to be Removed			12,432
Project Net Wastewater Flow			**3,302**

gpd = gallons per day, SF = square foot

1. Based on 100 percent of the sewer generation factors from the "Loading for each class of land use" from LACSD.
2. Assumes 'Warehouse' will be used for Data Hall Center, Mechanical Area, Electrical Area from LACSD.
3. Assumes 'Office Building' will be used for Office areas.
4. Assumes 'Service Station' will be used for Electrical Substation.

Source: Fuscoe Engineering, Water and Sewer Infrastructure Report, 2024.

A flowrate of 15,734 gpd is equivalent to 11 gallons per minute (gpm). Wastewater generated by the Project would drain into the existing 8-inch sewer line in Saturn Street, which has a sewer flow capacity of approximately 225 gpm at a slope of 1 percent with 50 percent filled capacity. The flow-depth of the existing 8-inch sewer has been evaluated and confirmed that there is capacity in the existing adjacent sewer system to convey the wastewater flows that would be generated by the Project. See Attachment F of **Appendix M-1.**

Additionally, a will-serve letter has been received from LACSD, confirming that LACSD has the capacity to accommodate the Project's estimated wastewater generation increase; see Attachment A of **Appendix M-1.** Furthermore, the Project's estimated wastewater generation of 3,302 gpd or 0.004 mgd comprises less than 0.002 percent of the wastewater that is processed daily at the Warren Facility.

For the reasons substantiated above, the Project would not require or result in the relocation or construction of new or expanded wastewater and wastewater treatment facilities. Impacts would be less than significant.

4.19a.iv Would the project require or result in the relocation or construction of new or expanded facilities concerning stormwater drainage, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. Refer to Response 4.10c concerning drainage patterns and stormwater drainage systems. As discussed in Response 4.10c, all proposed drainage improvements would be located within the Project Site. The Project would not require or result in the relocation or construction of new or expanded off-site stormwater facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project would result in a less than significant impact in this regard.

4.19a.v Would the project require or result in the relocation or construction of new or expanded facilities concerning electric power, natural gas, and telecommunications, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The City's electrical power is provided by SCE, and natural gas is provided by SoCalGas. The City's telecommunications are provided by various companies. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure throughout the City. Refer to Responses 4.6a and 4.6b for further discussions concerning electricity. The Project would not include any natural gas usage; therefore, the Project would not result in an impact on natural gas. The Project would include on-site connections to existing telecommunication services. The Project would not require or result in the relocation or construction of new or expanded off-site electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant

environmental effects. Therefore, the Project would result in a less than significant impact in this regard.

4.19b Would the project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. The City of Monterey Park 2020 Urban Water Management Plan (UWMP) projects water demands to increase from 8,671 acre-feet per year (AFY) in 2025 to 9,066 AFY in 2045 for dry years representing an increase in demand of 395 AFY and 8,421 acre-feet per year (AFY) in 2025 to 8,804 AFY in 2045 for normal years representing an increase in demand of 383 AFY. The proposed increase in demand from the Project of 3,962 gpd (4 AFY) represents approximately 1 percent of the total increase in demand from 2025 to 2045 in the UWMP. In addition, the volume of water supply required for the Project does not trigger the requirements for a water supply assessment pursuant to either SB 610 or SB 221. The UWMP also projects adequate supplies to meet all future demands. Therefore, the City would have sufficient water supplies available to serve the Project, and impacts would be less than significant.

4.19c 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 projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As demonstrated in Sections 4.19a.ii and Sections 4.19a.iii, there is existing treatment capacity in the region for estimated Project wastewater generation. Project development would not impact LACSD wastewater treatment facility capacity. The Project would not require or result in the relocation or construction of new or expanded off-site sewer facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project would result in a less than significant impact in this regard.

4.19d 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?

4.19e Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Athens Services waste haulers provide services in the City, including the Project Site. The City primarily disposes at landfills throughout Los Angeles County. Project construction would result in generation of construction and demolition (C&D) debris such as metal scrap, lumber, concrete which will be collected and diverted to a C&D debris facility for materials to be recycled and/or discarded. As shown in **Table 4.19-5: Estimated Solid Waste Generation**, C&D of the Project is estimated to generate approximately 10,127 tons of C&D debris. This estimation is a conservative estimate as it assumes that no reductions in waste generation would occur due to recycling.

Table 4.19-5: Estimated Solid Waste Generation				
Land Use	**Size**	**Waste Generation Rate**	**Waste Generated (tons)**	**Waste Generated (lbs)**
Demolition[1]				
Office	209.564 ksf	46 tons/ksf	9,640 tons	19,279,888 lbs
Construction[2]				
Data Center	218.4 ksf	4,020 lb/ksf	439 tons	877,968 lbs
Substation	24 ksf	4,020 lb/ksf	48 tons	96,480 lbs
Total Demolition and Construction Waste			*10,127 tons*	*20,254,336 lbs*
Operations[3]				
Data Center[4]	26 employees	13.82 lb/employees/day	0.18 tons	359 lbs
Total Operational Waste			*0.18 tpd*	*359 lbs/day*

ksf = thousand square feet; lbs = pounds; tpd = tons per day

1. The demolition waste generation rate of 46 tons/ksf is based on the CalEEMod User Guide Appendix A, page 13.
2. The construction waste generation rate of 4,020 lb/ksf is based on the U.S.EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.
3. Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed March 27, 2024.
4. Assumes "Warehouse" will be used for proposed data center.

Residual wastes such as trash packing materials, and plastics could require disposal at landfill. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations. All construction activities would be subject to conformance with relevant Federal, State, and local requirements related to solid waste disposal. The Project would be required to comply with the California Integrated Waste Management Act of 1989 (AB 939), which requires that at least 50 percent of waste produced is recycled, reduced, or composted and is included in MPMC Chapter 6.08, Solid Waste, Recyclables, and Construction and Demolition Debris, which would achieve compliance with State law.

As detailed in **Table 4.19-5**, Project operations would generate approximately 0.18 tons per day (tpd). The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other diversion measures. The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 137 million tons of remaining disposal capacity at the County's Class III landfills.[57] As such, the solid waste generated by the Project would be accommodated by the landfills that serve the Project Site.

During operation, the Project would be required to comply with CalRecycle's waste diversion rate target of 50 percent of the waste stream. The Project would also be subject to AB 1826, which requires businesses to provide separate recycling bins for organic waste. Therefore, the Project would be subject to compliance with the CALGreen Code, State regulations, and City regulations regarding solid waste management and reduction. Impacts would be less than significant.

[57] Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan: 2021 Annual Report, December 2022, https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF. Accessed March 18, 2024.

4.20 Wildfire

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				X
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?				X
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?				X
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?				X

Impact Analysis

4.20a *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

4.20b *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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?*

4.20c *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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?*

4.20d *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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?*

No Impact. See Response 4.9f. According to CAL FIRE, the Project Site is not within or near a SRA or a VHFHSZ.[58] The nearest VHFHSZ is located approximately 4 miles northwest of the Project Site. The Project Site is relatively flat and developed with urban uses (except for the grass lot and limited landscaped area bordering the northern boundary of the Project Site), which precludes factors such as slopes or strong winds from exacerbating fire risk. The Project is located on an existing developed site and would connect to existing utilities and would not require the installation or maintenance of infrastructure that may exacerbate fire risk. Post-fire impacts such as drainage changes and landslides would not occur as the Project Site and its surroundings are highly urbanized and mostly flat and not have any steep slopes or hillsides that would be susceptible to landslides or flooding. Therefore, the Project would result in no impact.

[58] California Department of Forestry and Fire Protection. FHSZ Viewer, https://egis.fire.ca.gov/FHSZ/. Accessed February 5, 2024.

4.21 Mandatory Findings of Significance

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Does the Project:				
a) 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?		X		
b) 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 the past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Impact Analysis

4.21a 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?

Less Than Significant With Mitigation Incorporated. As discussed throughout this IS/MND, the Project does not have the potential to degrade the environment's quality or result in significant environmental impacts that cannot be reduced to less than significant following compliance with the established regulatory framework (i.e., federal, State, and local regulations) and the recommended mitigation measures.

As concluded in **Section 4.4: Biological Resources**, the Project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal.

As concluded in **Section 4.5: Cultural Resources**, the Project would not eliminate important examples of the major periods of California history. The Project was assessed to have low

sensitivity for prehistoric resources and buried historic archaeological resources. Following implementation of **MM CUL-1**, potential impacts to archaeological resources would be reduced to less than significant.

As concluded in **Section 4.18: Tribal Cultural Resources**, the Project could cause an adverse change in the significance of a tribal cultural resource, unless mitigated. Following implementation of **MM TCR-1** through **MM TCR-3**, potential impacts to tribal cultural resources would be reduced to less than significant.

4.21b 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 the past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. The proposed Project would result in significant impacts unless mitigated for the following environmental resource areas: cultural resources, geology and soils, hazards and hazardous materials, noise and vibration, and tribal cultural resources. The potential impacts associated with these resource areas are localized, thus, would not result in cumulative impacts. Other development projects within the City would be subject to the City's discretionary review process, CEQA, and the established regulatory framework, which would be evaluated on a case-by-case basis.

For all other resources areas, the analysis determined the Project would result in either no impact or a less than significant impact following compliance with the established regulatory framework, without the need for mitigation. Project impacts would not be cumulatively considerable.

Based on correspondence with the City on March 14, 2024, there are no anticipated cumulative projects anticipated in a 0.5-mile radius of the Project Site. Additionally, Project impacts would be less than significant or less than significant with mitigation incorporated. Therefore, the proposed Project would not result in any cumulatively considerable impacts, and no mitigation is required.

4.21c Does the project have environmental effects which will cause substantial adverse effects on human beings, directly or indirectly?

Less Than Significant Impact. As discussed in the respective sections, the Project would have no potentially significant impacts that would not be reduced to less than significant following compliance with the established regulatory framework and/or recommended mitigation measures. The Project would not cause substantial adverse effects on human beings directly or indirectly. Therefore, impacts concerning adverse effects on human beings would be less than significant.

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