



## MEMORANDUM

To: Nancy Lee, Senior Planner, City of El Monte

From: Rita Garcia, Project Manager

Date: March 15, 2021

Subject: KB Home Orchard Street and Cypress Avenue Modified Project 2 Environmental Analysis

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### 1.0 PURPOSE

The purpose of this memorandum is to identify changes in environmental impacts, if any, associated with construction and operations of KB Home Orchard Street and Cypress Avenue Modified Project 2 (“Modified Project 2”), as compared to the Modified Project “Modified Project 1” addressed in the September 2020 Initial Study/Mitigated Negative Declaration (IS/MND).<sup>1</sup> The September IS/MND analyzed a site plan consisting of 103 residential dwelling units (DU). Since the IS/MND’s release, the Project Applicant has met with City Staff and has subsequently modified the Project in response to their comments. Modified Project 2 proposes detached condominiums instead of townhomes, 18 percent fewer DU (decreasing the total number from 103 DU to 84 DU), and an 18 percent decrease in density (from 20.2 DU/net AC to 16.47 DU/net AC), as well as increasing the private open space by 36.9 percent (from 13,948 SF to 37,783 SF).

**Attachment A: Modified Project 2 Description**, discusses Modified Project 2 in greater detail and includes **Exhibit 1: Site Plan – Modified Project 2**, which depicts Modified Project 2. **Table 1: Summary of Changes Between Modified Project 1 and Modified Project 2**, summarizes the changes between Modified Project 1 and Modified Project 2; see **Attachment A** for a detailed discussion of the changes. Modified Project 2 proposes a reduced development footprint and the same land use (i.e., residential), as Modified Project 1. This comparative analysis has been undertaken to analyze whether Modified Project 2 would result in any new or greater impacts, as compared to those identified in the September 2020 IS/MND for Modified Project 1. As concluded below, Modified Project 2 would overall lessen environmental impacts, as compared to Modified Project 1 given approximately 18 percent fewer DU are proposed. Further, Modified Project 2 would not result in any new or greater impacts, as compared to those identified in the IS/MND for Modified Project 1.

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<sup>1</sup> Available for review at the City of El Monte, Planning Division, City Hall West, 11333 Valley Boulevard, El Monte, California 91731 and on the City of El Monte website: <https://www.ci.el-monte.ca.us/499/Current-Projects> .

<b>Table 1: SUMMARY OF CHANGES BETWEEN MODIFIED PROJECT 1 AND MODIFIED PROJECT 2</b>			
<b>Description</b>	<b>Modified Project 1</b>	<b>Modified Project 2</b>	<b>Change</b>
Housing (Dwelling Units)	103	84	-19 (-18%)
Private Open Space (Square Feet)	13,948	37,783	+23,835 (+36.9%)
Off-Street Parking (Spaces)	63	37	-26 (-41%)
Traffic (Average Daily Trips)	298	146	-152 (-51%)
Population (Persons)	420	343	-77 (-18%)

## 2.0 ENVIRONMENTAL ANALYSIS

### 2.1 Aesthetics

Initial Study Section 4.1 addresses aesthetics and concludes that impacts would be less than significant and no mitigation is required. The Project would develop two and three-story detached single family homes in an already urbanized area. Currently, existing residences at Iris Lane, Orchard Street, and Cypress Avenue do not experience views of the San Gabriel Mountains due to intervening structures and vegetation, including utility pole lines, mature trees, and other structures and buildings. Therefore, Project implementation would not have an adverse effect on a scenic vista. Impacts would be less than significant, and no mitigation is required.

Modified Project 2 would result in 18 percent fewer DU, which would generate proportionately less light and glare. Therefore, Modified Project 2's impacts concerning aesthetics would be less than Modified Project 1.

### 2.2 Agricultural and Forestry Resources

Initial Study Section 4.2 discusses agricultural and forestry resources, and concludes Modified Project 1 would result in no impact and no mitigation is required. Given Modified Project 2 proposes a reduced development footprint and the same land use as Modified Project 1, Modified Project 2 would similarly result in no impact concerning agricultural and forestry resources and no mitigation is required.

### 2.3 Air Quality

Initial Study Section 4.3 discusses Modified Project 1's construction-related air emissions and concludes that less than significant impacts would occur following compliance with regulatory requirements. Given Modified Project 2 proposes 18 percent fewer DU, proportionately less

construction and associated emissions would occur. Impacts would remain less than significant and no mitigation is required.

Initial Study Section 4.3 discusses Modified Project 1's operational air emissions and concludes less than significant impacts would occur following compliance with regulatory requirements. Given Modified Project 2 would result in 18 percent fewer DU, which would result in a 51 percent reduction in daily vehicle trips, nominally less operational emissions would occur. Modified Project 2 would generate less NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, ROG, and CO emissions than Modified Project 1. Thus, like Modified Project 1, Modified Project 2's emissions would be below SCAQMD air quality thresholds.

#### **2.4 Biological Resources**

Initial Study Section 4.4 discusses Modified Project 1's biological resources, and concludes Modified Project 1 would result in less than significant impacts with mitigation incorporated. Given Modified Project 2 proposes a reduced development footprint and the same land use as Modified Project 1, Modified Project 2 would similarly have a less than significant impact concerning biological resources and no mitigation is required.

#### **2.5 Cultural Resources**

Initial Study Section 4.5 discusses cultural resources, and concludes Modified Project 1 would result in less than significant impacts with mitigation incorporated. Given Modified Project 2 proposes a reduced development footprint as Modified Project 1, Modified Project 2 would similarly have a less than significant impact concerning cultural resources with mitigation incorporated.

#### **2.6 Energy**

Initial Study Section 4.6 discusses energy, and concludes Modified Project 1 would result in less than a significant impact and no mitigation is required. Modified Project 2 would result in 19 fewer DU, thus, proportionately less energy would be used during construction and operations. Given Modified Project 2 proposes a reduced development footprint and fewer DU than Modified Project 1, Modified Project 2 would similarly have a less than significant impact concerning energy and no mitigation is required.

#### **2.7 Geology and Soils**

Initial Study Section 4.7 discusses geology and soils and concludes Modified Project 1 would result in less than significant impacts following compliance with regulatory requirements and incorporation of mitigation measures. Modified Project 2 would have a reduced development footprint as Modified Project 1, thus would result in similar impacts to paleontological resources. Since Modified Project 2 would construct 18 percent fewer DU, less construction activities and earthwork would occur within the footprint. Given a reduced development footprint, potential impacts would similarly occur with Modified Project 2 concerning erosive, unstable, or expansive soils. Given Modified Project 2 proposes a reduced development footprint and the same land use as Modified Project 1, Modified Project 2

would similarly have a less than significant impact concerning geology and soils following compliance with regulatory requirements and incorporation of mitigation measures.

## **2.8 Greenhouse Gas Emissions**

Initial Study Section 4.8 discusses Modified Project 1's construction-related greenhouse gas (GHG) emissions and concludes less than significant impacts would occur following compliance with regulatory requirements. Given Modified Project 2 proposes 19 fewer total DU, nominally less construction emissions would occur. Impacts would remain less than significant and no mitigation is required.

Initial Study Section 4.8 discusses Modified Project 1's operational GHG emissions and concludes less than significant impacts would occur following compliance with regulatory requirements. Given Modified Project 2 would result in 19 fewer DU, nominally less operational GHG emissions would occur. Modified Project 2 would generate less GHG emissions than Modified Project 1. Thus, Modified Project 2 would still be below GHG thresholds, a less than significant impact would occur, and no mitigation is required.

## **2.9 Hazards and Hazardous Materials**

Initial Study Section 4.9 discusses Modified Project 1's potential impacts concerning hazards and hazardous materials and concludes less than significant impacts would occur with mitigation incorporated. Given Modified Project 2 proposes a reduced development footprint and the same land use as Modified Project 1, Modified Project 2 would similarly have a less than significant impact concerning hazards and hazardous materials with mitigation incorporated.

## **2.10 Hydrology and Water Quality**

Initial Study Section 4.10 discusses Modified Project 1's potential impacts concerning hydrology and water quality, and concludes less than significant impacts would occur and no mitigation is required. Given Modified Project 2 proposes a reduced development footprint and the same land use as Modified Project 1, Modified Project 2 would similarly have a less than significant impact concerning hydrology and water quality and no mitigation is required.

## **2.11 Land Use and Planning**

Initial Study Section 4.11 discusses Modified Project 1's potential impacts concerning land use and planning, and concludes less than significant impacts would occur and no mitigation is required. Given Modified Project 2 proposes a reduced development footprint and the same land use as Modified Project 1, Modified Project 2 would similarly have a less than significant impact concerning land use and planning and no mitigation is required.

## **2.12 Mineral Resources**

Initial Study Section 4.12 discusses Modified Project 1's potential impacts concerning mineral resources, and concludes no impact would occur and no mitigation is required. Given Modified Project 2 proposes a reduced development footprint as Modified Project 1, Modified Project 2 would similarly have no impact concerning mineral resources and no mitigation is required.

## **2.13 Noise**

Initial Study Section 4.13 discusses Modified Project 1's potential impacts concerning noise and vibration, and concludes a less than significant impact would occur with mitigation incorporated. Modified Project 2 would result in 18 percent fewer DU, thus proportionately less construction activities and construction noise would occur, as compared to Modified Project 1. Modified Project 2 proposes 18 percent fewer DU, which would result in a 51 percent reduction in average daily trips with a proportionate decrease in mobile source operational noise, as compared to Modified Project 1. Given a reduced development footprint and the same land use are proposed, Modified Project 2 would similarly have a less than significant impact concerning noise and vibration and no mitigation is required.

## **2.14 Population and Housing**

Initial Study Section 4.14 discusses Modified Project 1's potential impacts concerning population and housing, and estimates Modified Project 1's forecast population growth would be approximately 420 persons. Thus, Modified Project 1 would induce direct population growth in the City by proposing new homes. The Initial Study concludes a less than significant impact would occur concerning population growth, and no mitigation is required. Modified Project 2 would result in 18 percent fewer DU, and thus proportionately less population growth. Assuming 84 DU and 4.08 persons per household,<sup>2</sup> Modified Project 2 would result in a population growth of approximately 343 persons, approximately 18 percent less population growth (77 fewer persons), as compared to Modified Project 1's population growth. Thus, Modified Project 2's impacts concerning population and housing would be less than significant and no mitigation is required.

## **2.15 Public Services**

Initial Study Section 4.15 discusses Modified Project 1's potential impacts to public services, and concludes a less than significant impact would occur and no mitigation is required. Modified Project 2 would result in 18 percent fewer DU, thus proportionately less demand on fire protection, police protection, schools, parks, and other public facilities, as compared to Modified Project 1. Modified Project 2 would pay in-lieu fees for public services in compliance with City requirements. Given Modified Project 2 proposes a reduced development footprint and fewer DU than Modified Project 1,

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<sup>2</sup> State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2020. Sacramento, California, May 2020.

Modified Project 2 would similarly have a less than significant impact concerning public services and no mitigation is required.

**2.16 Recreation**

Initial Study Section 4.16 discusses Modified Project 1’s potential impacts to recreational facilities, and concludes a less than significant impact would occur and no mitigation is required. Modified Project 2 proposes 18 percent fewer DU and 18 percent more total open space, than Modified Project 1. Modified Project 2 would comply with EMMC Chapter 16.34 and City Council Ordinance No. 2663 concerning payment of in-lieu fees to the City for recreational facilities. Given Modified Project 2 proposes a reduced development footprint and the same land use as Modified Project 1, Modified Project 2 would similarly have a less than significant impact concerning recreational facilities, and no mitigation is required.

**2.17 Transportation**

Initial Study Section 4.17 discusses Modified Project 1’s transportation impacts and concludes less than significant impacts would occur and no mitigation is required. Initial Study **Table 4.17-3: Net Project Trip Generation**, presents Modified Project 1’s trip generation. As indicated in **Table 4.17-3**, Modified Project 1 would result in approximately 298 net average daily trips (ADT), including -6 AM peak hour and +14 PM peak hour trips, as compared to existing conditions.

**Table 2: Modified Project 2 Net Trip Generation**, below presents Modified Project 2’s trip generation, and indicates Modified Project 2 would result in 146 ADT, including -17 AM peak hour and -1 PM peak hour trips, as compared to existing conditions. **Table 2** also indicates Modified Project 2 would result in 152 fewer ADT (a 51 percent reduction), including -11 AM peak hour and -15 PM peak hour trips, as compared to Modified Project 1.

As with Modified Project 1, Modified Project 2 would result in a less than significant transportation impact concerning VMT, based on VMT Area and Proximity to Transit screening. Modified Project 2 would not conflict with State CEQA Guidelines §15064.3(b). Therefore, Modified Project 2 would result in a less than significant impact concerning VMT.

TABLE 2: MODIFIED PROJECT 2 NET TRIP GENERATION							
Land Use	Trip Generation <sup>1</sup>						
	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Existing Uses	526	50	12	62	12	50	62
Modified Project 2	672	5	41	46	40	22	62
<b>Modified Project 2 Net Trips</b>	<b>146</b>	<b>-45</b>	<b>29</b>	<b>-17</b>	<b>28</b>	<b>-28</b>	<b>-1</b>
Modified Project 1 Net Trips	298	-43	38	-6	37	-23	14

<b>Modified Project 2 and Project 1 Net Trip Difference</b>	<b>-152</b>	<b>-2</b>	<b>-9</b>	<b>-11</b>	<b>-9</b>	<b>-5</b>	<b>-15</b>
<b>Modified Project 2 and Project 1 Net Trip Percent Difference</b>	<b>-51%</b>	<b>5%</b>	<b>-24%</b>	<b>183%</b>	<b>-24%</b>	<b>-82%</b>	<b>-107%</b>
Source: Kimley-Horn, 2021							

**2.18 Tribal Cultural Resources**

Initial Study Section 4.18 discusses Modified Project 1’s potential impacts to tribal cultural resources, and concludes less than significant impacts would occur with mitigation incorporated. Given Modified Project 2 proposes a reduced development footprint as Modified Project 1, Modified Project 2 would similarly have a less than significant impact concerning tribal cultural resources with mitigation incorporated.

**2.19 Utilities and Service Systems**

Initial Study Section 4.19 discusses Modified Project 1’s potential impacts to utilities and service systems, and concludes less than significant impacts would occur and no mitigation is required. Modified Project 2 would result in 18 percent fewer DU, thus proportionately less demand for water, electricity, and natural gas and proportionately less generation of wastewater and solid waste, as compared to Modified Project 1, during construction and operations. As with Modified Project 1, utility providers would have sufficient capacity to provide service to Modified Project 2. Given the Modified Project 2 proposes a reduced development footprint and the same less land use, as compared to Modified Project 1, Modified Project 2 would similarly have a less than significant impact concerning utilities and service systems and no mitigation is required.

**2.20 Wildfire**

Initial Study Section 4.20 discusses Modified Project 1’s potential impacts concerning wildfire hazards and concludes the Project site is not located within a CalFire Fire Hazard Severity Zone, thus no impact would occur and no mitigation is required. Given Modified Project 2 proposes a reduced development footprint and the same land use as Modified Project 1, Modified Project 2 would similarly have no impact concerning wildfire and no mitigation is required.

**2.21 Mandatory Findings of Significance**

Initial Study Section 4.21 discusses whether Modified Project 1 would substantially degrade the quality of the environment, cause cumulatively considerable impacts, or cause environmental effects, which would cause substantial adverse effects on human beings. The Initial Study concluded Modified Project 1 would result in a less than significant impact in this regard. Given Modified Project 2 proposes a reduced development footprint and the same less land use as Modified Project 1, Modified

Project 2 would similarly have no impact concerning these environmental issues and no mitigation is required.