

1 Introduction

This Finding of Consistency evaluates whether the proposed 1501 Del Norte Street residential project (hereafter referred to as the “revised project”) is consistent with the findings and assumptions analyzed in the circulated Initial Study – Mitigated Negative Declaration (IS- MND). The IS-MND was circulated for public review and comment from October 28, 2025, through December 1, 2025. Subsequent modifications to the project propose to eliminate the previously analyzed four-story stacked flats and replace with three-story townhome units. As a result of this change, the total number of units would be reduced from 282 to 260 dwelling units, bringing the overall density below 20 du/ac and within the Neighborhood Medium Residential designation. Building height would now be limited to three stories consistent with the townhome product type. Additionally, there would be an increase in open space on site (due to the increase of private open space and reduced building footprint size), as well as an increase in the parking ratio from 2.25 to 2.3 spaces per unit. The revised project would not introduce new land uses, intensify the project beyond previously evaluated levels, or expand the project footprint as analyzed below.

Project Overview

As described in the circulated IS-MND, the revised project includes a General Plan Amendment, a Specific Plan, a Zone Change, a Precise Plan, a Tentative Tract Map and a Tree Removal Permit. The proposed project would include the demolition of the existing buildings and structures on the project site (requiring a demolition permit); followed by construction of 34 two-story single-family detached homes and 226 three-story attached townhomes, for a total of 260 homes. The project site is 13.56-acres, of which 13.19 acres would be developed for residential uses and common space and the additional 0.37 acres would be used as an extension and dedication of West Del Norte Street from its current terminus east to North Sunset Avenue. The total development footprint is the same as the circulated project IS-MND.

The detached single-family homes would be two stories with a maximum height to peak of roof of 24 feet, 6 inches and include three- and four-bedroom homes. These two-story single-family homes would include a private yard, two-car, side-by-side garage and a driveway two cars in width, and would serve as a buffer between the proposed project and the existing single family homes along North Nora Avenue and West Del Norte Street. The attached townhomes would be three stories (maximum height to peak of roof of 37 feet 10 inches) and include a mix of two- to four-bedroom homes. Each townhome unit would contain private open space in the form of a porch and/or deck totaling approximately 31,200 square feet (sf) of private open space. Each of the residential units would include a two-car garage (for a total of 520 enclosed parking spaces) and there would also be 88 uncovered parking spaces provided for guest parking, resulting in 608 total parking spaces, which would be distributed throughout the community. The change in the project description results in an increase in the parking ratio from 2.25 to 2.3 spaces per dwelling unit compared to the circulated IS-MND.

The proposed project would increase the amount of common open space, which includes approximately 120,168 sf of common open space, including an 18,000 sf central community space

which would provide amenities such as a pool and restroom buildings, shade structure with seating, BBQ counter with seating, and a turf area for passive lawn play. Landscaping, including a variety of trees, shrubs, and groundcover would be provided throughout the project site. Fencing and walls would be used throughout the project site and along the project site borders to define private and semi-private spaces and would serve as a unifying design element. Fencing and perimeter walls would range from three feet to six feet in height, with pilasters up to eight feet and portal elements up to twelve feet in height.

In addition, the project approvals include establishing a new Specific Plan for the site, which would provide land use and development standards for the proposed project and would allow the proposed net density of under 20 dwelling units per acre (du/ac). The proposed project also includes the following requests:

- General Plan Amendment (GPA) to change the land use designation from Civic: Schools to Neighborhood Medium Residential (up to 20 units per acre)
- A Zone Change (to Specific Plan) to allow the proposed net density of 20 dwelling units per acre (du/ac);
- A Specific Plan, which provides land use and development standards for the proposed project and would allow a net density of 20 dwelling units per acre; and
- A Precise Plan for site plan layout and design
- A Tentative Tract Map to subdivide the property into multiple parcels
- A Tree Removal Permit to remove one significant tree.

Vehicles would be able to access the proposed project via a primary entrance on West Del Norte Street, and a secondary entrance on North Nora Avenue. Both entries would be defined by pedestrian entry pilasters with project signage, accent trees, enhanced landscaping and paving, and parkways and sidewalks on both sides. In addition, a 26-foot private lanes would provide vehicular access to all homes, which would be connected by the primary entrance on West Del Norte Street, and the secondary entrance on North Nora Avenue. Pedestrians would be able to access the project site via the sidewalks along West Del Norte Street, and North Nora Avenue. Residents will also be able to access the project site via two access points from Del Norte Park.

Table 1 summarizes the characteristics of the proposed project. Table 2 summarizes the characteristics of the proposed residential unit types.

1.1.1 Construction Phasing

The construction process would include demolition of the existing buildings located on the project site and construction of up to 260 homes along with associated community amenities on the site. Construction phases would include demolition, site preparation, grading, building construction, paving, and architectural coating. Construction of the proposed project is anticipated to occur over an approximately two year period, beginning in January 2026 and ending in January 2028. Construction would occur Monday through Friday between the hours of 7:00 a.m. and 8:00 p.m. pursuant to West Covina Municipal Code construction standards. Construction staging would occur within the project site boundaries. Occupancy is expected to take place in 2028.

Table 1 Project Characteristics

Characteristics	Details
Address	1501 Del Norte Street
APN	8458-020-901
Gross Lot Area	13.56 acres
Net Lot Area	13.19 acres ¹
Residential	
Residential Lot Area	13.19 acres
Number of Residential Units	260 dwelling units
Residential Net Density	19.7 du/ac ²
Open Space	
Common Open Space	120,168 sf (462 sf/unit)
Private Open Space	46,021 sf (117 sf/unit; min. 60 sf/unit)
Total Open Space	148,333 sf (571 sf/unit)
Parking	
Garage	520 spaces (2 car garage per unit)
Uncovered Guest Parking	88 spaces
Total Parking	608 spaces
▪ sf = square feet ▪ ¹ Upon completion of the proposed project, the residential portion of the site would be reduced to 13.19 acres due to the 0.37-acre extension and dedication of West Del Norte Street from its current terminus east to North Sunset Avenue. ▪ ² Residential net density is calculated by dividing the number of proposed units by the net lot size.	

Table 2 Townhome Residential Unit Type Summary

Unit Type (Count)	Area (sf)	Bedroom/Bathroom Count	Maximum Height
Detached Single-Family Homes¹			
Plan 3222 (17)	1,600 sf	3 bedroom, 2.5 bathroom	24'3" (two-story) ¹
Plan 3522 (17)	1,891 sf	4 bedroom, 3 bathroom	24'-6" (two-story)
3-Story Attached Townhomes²			
Plan 2532 (52)	1,210 sf	2 bedroom, 2.5 bathroom	37'-10" (three-story)
Plan 1633 (87)	1,497 sf	3 bedroom, 3 bathroom	37'-10" (three-story)
Plan 1638 (87)	1,791 sf	4 bedroom, 4 bathroom	37'-10" (three-story)
Total Housing Units: 260 Homes			

N/A = Not Applicable

¹ Plan 3222 and Plan 3522 include exterior elevations for Spanish and Seaside designs as shown in the Architectural sheets of the Entitlement Package.

² All plans for the 3-Story Attached Townhomes would vary among the Spanish and Seaside designs as shown in the Architectural sheets of the Entitlement Package.

2 Environmental Impacts

The following discussion addresses each of the environmental issues studied in the circulated IS-MND, comparing the effects of the proposed project modifications to those analyzed in the circulated IS-MND.

Aesthetics

The circulated IS-MND concluded that the project would have a less than significant impact related to aesthetics. Under the revised project, the elimination of the four-story units with a maximum building height of 37 feet 10 inches would result in reduced overall vertical massing compared to the circulated IS-MND. Accordingly, the revised project would result in reduced impacts relative to the circulated IS-MND regarding scenic vistas, scenic resources within a state scenic highway, lighting or glare, and changes to the City's existing visual character. The revised project maintains the same development footprint; therefore, the revised project would continue to result in less-than-significant aesthetic impacts and would incrementally reduce them relative to the circulated project.

Agriculture and Forestry Resources

The circulated IS-MND concluded project impacts related to agriculture and forestry resources would have no impact. The project site is fully urbanized, developed with vacant school buildings, and is neither zoned nor designated for agricultural use. The California Department of Conservation identifies no Prime, Unique, or Statewide Important Farmland on the site, and the project site is not under a Williamson Act contract. Likewise, the area is not designated as forest land, timberland, or Timberland Production Zone. The revised project would not involve any substantial development changes to land use or changes to construction activities as analyzed in the circulated IS-MND. Therefore, implementation of the revised project would not convert farmland or forest land, nor would it induce surrounding land conversion due to its urban context. Like the circulated IS-MND, no impacts to agriculture and forestry resources would occur.

Air Quality

The circulated IS-MND concluded project impacts to air quality would be less than significant. The revised project would reduce the residential density from 282 units to 260 units, eliminating the four-story stacked flats and replacing them with three-story townhomes. This reduction in unit count and building mass would proportionally lower construction and operational emissions compared to the project analyzed in the circulated IS-MND. Because the overall site layout remains similar and no additional emission generating land uses or equipment is proposed, no new or greater sources of criteria pollutants would occur. Pollutants associated with the revised project would either decrease or remain comparable to those modeled in the circulated IS-MND, remaining below South Coast Air Quality Management District regional thresholds. Likewise, the reduced population and trip generation potential would maintain or improve consistency with the 2022 Air Quality Management Plan growth assumptions. Localized emissions near sensitive receptors would also remain at or below previously analyzed levels due to reduced construction activity and fewer dwelling units. The revised project maintains the same land use type and would not introduce new odor generating uses; construction related odors would remain temporary. Therefore, air quality impacts under the revised project would remain less than significant.

Biological Resources

The circulated IS-MND concluded the project would have a less than significant impact related to biological resources with mitigation included. As discussed in the circulated IS-MND the 13.56-acre project site is urbanized and lacks suitable habitat for special-status plant and wildlife species. Nonetheless, database review of the United States Fish and Wildlife Service (USFWS) Environmental Conservation Online System (ECOS): Information for Planning and Consultation System (IPaC) (USFWS 2025a), USFWS Critical Habitat Portal (USFWS 2025b), USFWS National Wetlands Inventory (NWI) (USFWS 2025c), California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) (CDFW 2025a), CDFW Biogeographic Information and Observation System (BIOS) (CDFW 2024b) and California Native Plant Society (CNPS) Online Inventory of Rare, Threatened and Endangered Plants of California (CNPS 2025) identified records or ranges of 35 special status plants and 47 special status wildlife species within the project site vicinity (within a 9-quadrangle search area). Although regional biological databases identify multiple special-status plant and wildlife species in the broader vicinity, the site's disturbed conditions, ornamental vegetation, and lack of native habitat do not support these species. Reduction of the project from 282 units to 260 units, elimination of four-story buildings, and replacement with three-story townhomes would not increase the development footprint and would not introduce new habitat disturbance beyond what was previously analyzed in the circulated IS-MND. Additionally, the revised project minimally increases on-site open space, which would further reduce the potential for ground disturbance impacts.

However, existing ornamental vegetation could support nesting migratory birds protected under the Migratory Bird Treaty Act and California Fish and Game Code, therefore, Mitigation Measure BIO -1 (nesting bird avoidance and pre-construction surveys) remains applicable to the project as revised and would continue to reduce potential impacts to less than significant with mitigation.

The revised project would not introduce new biological impacts, and Mitigation Measure BIO-1 would remain applicable to reduce potential nesting bird impacts to less than significant. Therefore, impacts to biological resources under the revised project would remain less than significant with mitigation incorporated.

Cultural Resources

The circulated IS-MND concluded that the project would have no impact on historical resources, a less than significant impact with mitigation incorporated related to archaeological resources, and a less than significant impact related to disturbance of human remains. The revised project would remove the previously proposed four-story stacked flats which would reduce the total unit count from 282 to 260 and replace them with additional three-story townhomes. This modification would not expand the development footprint and would not introduce new areas of ground disturbance and would not alter the project's land uses or construction activities. Because the revised project would remain within the same site boundaries and construction area, it would not result in a change in the significance of a historical resource, archaeological resource, or human remains.

Furthermore, the revised project would continue to comply with applicable federal, State, and local regulations governing cultural resources. The mitigation measures identified in the circulated IS - MND remain applicable to the revised project. Mitigation Measure CUL-1, which establishes procedures in the event of an unanticipated archaeological discovery during ground -disturbing activities, would continue to apply. Additionally, with adherence to existing regulations (Health and

Safety Code Section 7050.5 and Public Resources Code Section 5097.98), impacts to human remains would be less than significant.

Therefore, with continued adherence to regulatory requirements and implementation of applicable mitigation measures, the revised project would not result in new or more severe cultural resource impacts beyond those identified in the circulated IS-MND.

Energy

The circulated IS-MND concluded that the project would result in less than significant impacts related to energy during both construction and operation. The revised project changes would not expand the development footprint, nor would introduce additional construction activities, and would not add to the operational demand of the project. Rather, the reduction in residential units and building height would reduce or maintain the estimates of energy use associated with construction equipment, hauling, and fuel consumption.

Under the circulated IS-MND, construction activities would be temporary, typical of similar residential developments, and subject to existing fuel-efficiency and idling. These requirements would continue to apply to the revised project. Similarly, project operation would remain subject to California Building Energy Efficiency Standards and CALGreen requirements, including energy - efficient lighting, rooftop solar, high-efficiency appliances, cool roofs, and performance standards that minimize long-term electricity and fuel consumption. Because the revised project would not increase development density and continues to incorporate these design and code requirements, the project would not result in wasteful, inefficient, or unnecessary energy use.

The circulated IS-MND also concluded that the project would not conflict with or obstruct state or local plans for renewable energy or energy efficiency. The revisions would not change land use type, would not alter energy performance commitments, and remain consistent with the intent of the City's Energy Action Plan and statewide energy efficiency regulations. Compliance with CALGreen, Title 24, and the California Energy Code would continue to ensure alignment with applicable energy conservation policies.

Accordingly, the revised project would not result in new or more severe energy impacts beyond those identified in the circulated IS-MND, and no additional mitigation is required.

Geology and Soils

The circulated IS-MND concluded that the project would have less than significant impacts related to geology and soils, including seismic hazards, liquefaction, landslides, unstable soils, expansive soils, and soil erosion, with mitigation incorporated for paleontological resources. The revised project changes would not expand the disturbance footprint, alter grading quantities or depth, nor introduce new construction methods or ground-disturbing activities. As such, the revised project would not increase the risk of geologic or seismic-related hazards beyond those analyzed in the circulated IS-MND.

The project site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known faults traverse the property. Although strong seismic ground shaking could occur regionally, building design would continue to comply with the California Building Code and the recommendations of the Preliminary Geotechnical Due Diligence Study for appropriate structural safety under current seismic standards. The circulated IS-MND also determined that the site has a low liquefaction potential, and the site does not contain slopes capable of landslides and would not create or exacerbate soil instability. The revised project would not modify grading or site topography in a

manner that changes those conclusions, consistent with the circulated IS-MND. During construction, standard regulatory requirements including compliance with the Construction General Permit, preparation of a SWPPP, and implementation of best management practices would continue to minimize erosion and off-site sedimentation. Additionally, subsurface investigations confirmed that on-site soils have very low expansion potential, and the project would connect to the existing public sewer system; no septic systems are proposed. Therefore, risks from expansive soil or wastewater disposal would remain unchanged and less than significant.

As determined in the circulated IS-MND, the potential for unique paleontological resources on site is low due to prior ground disturbance and young alluvium deposits, however there is remote possibility of encountering paleontological resources during excavation. Therefore, with implementation of Mitigation Measure GEO-1 as described in the circulated IS-MND, impacts would be less than significant. Accordingly, the revised project would not result in new or more severe geology, soils, or paleontological impacts compared to the circulated IS-MND, and the previously adopted mitigation would remain applicable.

Greenhouse Gases

The circulated IS-MND concluded that the project would have a less than significant impact related to greenhouse gas (GHG) emissions. Project-generated GHG emissions, including amortized construction emissions and annual operational emissions, would be less than significant and below the SCAQMD screening threshold of 3,000 MTCO₂e/yr. The revised project reduces the total unit count from 282 to 260 while increasing on-site open space. These changes would not expand the development footprint or intensify operations and would be expected to maintain or minimally reduce overall GHG emissions compared to the circulated IS-MND. The circulated IS-MND also found the project to be consistent with applicable plans and policies for GHG reduction, including the 2022 CARB Scoping Plan. The revised project would continue to meet these requirements, including meeting CALGreen and Title 24 compliance, infill development, and VMT-reduction strategies. Therefore, the revised project would not result in new or more severe GHG impacts beyond those identified in the circulated IS-MND, and no additional mitigation is required.

Hazards and Hazardous Materials

The circulated IS-MND concluded hazards and hazardous materials impacts to be less than significant with mitigation incorporated for building-related contaminants and potential soil contamination. The revised project changes would not expand demolition areas, increase disturbance, or introduce new hazardous uses. Construction would continue to involve limited quantities of fuels and equipment-related materials subject to existing state and federal handling regulations. Operational hazardous materials would remain typical of residential maintenance. Therefore, the revised project would not create new or more severe hazards related to the routine transport, use, or disposal of hazardous materials.

As previously analyzed, potential building contaminants and unknown subsurface conditions would continue to be addressed through Mitigation Measures HAZ-1 (testing and abatement of asbestos-containing materials, lead-based paint, and polychlorinated biphenyls) and HAZ-2 (phase I ESA and follow-up investigation/remediation as needed). The site is not listed under Government Code Section 65962.5, is not located within 0.25 miles from schools, is not in an airport hazard area, and is not within a wildland fire zone.

Therefore, the revised project would not result in new or more severe hazards and hazardous materials impacts, and Mitigation Measures HAZ-1 and HAZ-2 remain applicable.

Hydrology and Water Quality

The circulated IS-MND concluded that the project would have less-than-significant impacts related to hydrology and water quality. The revised project would not involve any additional development, changes to land uses, or changes to construction activities, as the revised project seeks to eliminate the four-story stacked flats and the additional townhomes would be built concurrently with construction of the project as previously analyzed. Because there are no additional construction activities, the revised project would not involve changes in ground disturbance that would violate water quality standards, substantially decrease groundwater supplies, substantially alter existing drainage patterns, or release pollutants in a flood hazard, tsunami, or seiche zone. Furthermore, the revised project would continue to be required to comply with federal, State, and local regulations and policies to ensure a less than significant effect on the environment, including regulations and policies related to hydrology and water quality. Therefore, the revised project would not result in new or more severe impacts related to hydrology and water quality.

Land Use and Planning

The circulated IS-MND concluded that the project would have a less than significant impact related to land use and planning. The project would not physically divide an established community and would be consistent with applicable land use plans and regulations. The revised project reduces overall density bringing the total unit count down from 282 units to 260 units by eliminating the four-story flats for additional three-story townhomes, increasing open space, and maintains the internal circulation and perimeter access points as previously analyzed. These modifications to the project would not introduce new barriers, alter neighborhood connectivity, or change the project orientation in a way that would divide surrounding residential areas.

Similarly, the revised project would continue to be implemented under the Del Norte Specific Plan, which establishes objective development standards that supersede existing zoning. The General Plan Amendment would now apply only to the Residential Medium designation rather than mixed-medium/high densities, and the revised building height cap is lower than the prior analyzed four-story unit type. The revised project changes are more compatible with adjacent single-family neighborhoods and would not create conflicts with land use policies adopted to avoid or mitigate environmental effects. Accordingly, the revised project would not result in new or more severe impacts to land use and planning, and impacts would remain less than significant.

Mineral Resources

The circulated IS-MND concluded there would be no impact related to mineral resources because the site is fully developed, surrounded by urban uses, and not used for or compatible with mineral extraction. Although mapped as MRZ-2, the City's General Plan EIR states that West Covina does not contain mineral resources suitable for recovery. The revised project maintains the same development footprint and land use and would not alter the circulated IS-MND conclusion. No impact would occur.

Noise

The circulated IS-MND concluded that the project would have a less than significant impact related to noise with mitigation incorporated. Construction of the project would temporarily exceed daytime noise thresholds at nearby sensitive receptors to the east and south, requiring mitigation. Short-term construction noise would be reduced to below applicable standards through Mitigation

Measure N-1 (temporary noise barriers) and Mitigation Measure N-2 (restrictions on large equipment near property lines). The circulated IS-MND concluded that operational noise from traffic and residential mechanical equipment would not result in a substantial permanent increase in ambient noise levels, and modeled increases would remain below Federal Transit Administration thresholds and existing ambient conditions. Additionally, groundborne vibration would be less than significant with Mitigation Measure N-2, which avoids the use of heavy bulldozers near adjacent structures. The revised project revisions would not increase duration of construction, equipment needs, or operational noise sources. No new noise-generating land uses are introduced, and mechanical equipment and traffic estimates would remain similar or slightly reduced. Similar to the circulated IS-MND, the revised project would not result in new or more severe noise impacts and Mitigation Measures N-1 and N-2 remain applicable.

Population and Housing

The circulated IS-MND concluded less than significant impacts related to population and housing. The revised project would reduce the total number of units to 260 and, like the circulated IS-MND, would not extend infrastructure beyond that needed to serve the site. Based on an average household size of 3.14 persons, the revised project would generate approximately 816 residents compared to 885 residents analyzed in the circulated IS-MND, representing less than 1 percent of the City's population and well within SCAG 2045 growth forecasts. Additionally, as analyzed in the circulated IS-MND the project would not introduce employment uses or growth-inducing infrastructure. The site does not currently contain housing; therefore, the revised project would not displace any existing residents or dwelling units, and no replacement housing would be required. Impacts would remain less than significant.

Public Services

The circulated IS-MND concluded less than significant impacts related to public services. Like the Circulated IS-MND, the revised project would incrementally increase demand for fire, police, schools, parks, and other public services, but would not require new or expanded facilities that could cause environmental impacts. The revised project reduces total units from 282 to 260, which would decrease population generation compared to the circulated IS-MND and thus the corresponding service demand would also incrementally decrease.

The project site would continue to be served by the West Covina Fire Department and West Covina Police Department. Site access, internal streets, and building design would continue to meet fire code and emergency access standards, and service providers would continue to review plans through the City's permit process. The reduction in units would not increase emergency service needs or necessitate new or expanded facilities.

Public school demand would decrease proportionally and would remain fully mitigated through mandatory school impact fees under Government Code Section 65995. Parks and recreational demand would remain within City service ratios, and the revised project would continue to provide on-site common open space. Therefore, the revised project would not create the need for new or physically altered government facilities, and impacts would remain less than significant.

Recreation

The circulated IS-MND concluded that the project would have a less than significant impact related to recreation. Like the IS-MND circulated, the revised project would not substantially increase demand for existing parks or require new recreational facilities. The revised project reduces the

number of units from 282 to 260, which would further lessen anticipated use of nearby parks. Although the project would replace a portion of former school open space, it would provide approximately 120,168 sf of on-site common open space and would continue to pay the required parkland dedication fees. Therefore, impacts would remain less than significant.

Transportation

The circulated IS-MND concluded the project would have a less than significant impact related to transportation. The revised project would result in fewer dwelling units than analyzed in the circulated IS-MND, lower overall density (<20 du/ac), and reduce building height. These changes would marginally reduce vehicle trip generation, parking demand, and resident population. The site circulation network, driveway locations, and extension and dedication of West Del Norte Street would remain unchanged from the circulated IS-MND, and all required pedestrian and ADA improvements would continue to be provided. Because the revised project maintains the same residential land use, access points, internal circulation, and site plan layout while slightly reducing project density, the revised project would not create transportation related impacts beyond those previously analyzed. Therefore, impacts would remain less than significant.

Tribal Cultural Resources

The circulated IS-MND concluded that the project would have a less than significant impact related to tribal cultural resources with mitigation incorporated. As discussed in the circulated IS -MND, the project has the potential to encounter previously undiscovered tribal cultural resources during ground disturbance, and project-specific tribal consultation under AB 52 and SB 18 with the Gabrieleño Band of Mission Indians–Kizh Nation resulted in requested implementation of additional measures to protect potential intact subsurface resources. Mitigation Measures CUL-1 and TCR-1 through TCR-3 would continue to apply to the revised project, including Native American monitoring, treatment of unanticipated discoveries, and procedures for human remains.

The revised project would result in fewer units within the same development footprint, and construction activities, grading depths, and soil disturbance would remain the same as analyzed in the circulated IS-MND. With implementation of the existing mitigation measures, the revised project would not create impacts beyond those previously analyzed. Like the circulated IS-MND, the revised project would not result in new or more severe impacts to tribal cultural resources, and Mitigation Measures CUL-1 and TCR-1 through TCR-3 would remain applicable.

Utilities and Service Systems

The circulated IS-MND concluded that the project would have a less than significant impact related to utilities and service systems. As analyzed in the circulated IS-MND, the utility and service demands generated by the project would be adequately served by existing infrastructure and available capacity. Additionally, the project site is already served by electric power, natural gas and telecommunications facilities and would not require new or expanded facilities. The revised project would result in fewer units within the same development footprint. Construction activities, utility installation, and demand for water, wastewater, and solid waste services would remain consistent with the circulated IS-MND. Likewise, the revised project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities; nor generate demand for water supply or solid waste service. As such, the revised project would not result in new or more

severe impacts related to utilities and service systems and impacts would remain less than significant.

Wildfire

The circulated IS-MND concluded the project would have a less than significant impact related to wildfire. The project site is located in an urbanized area and is not within a State Responsibility Area or any Fire Severity zone. The revised project would develop fewer units within the same disturbed footprint and would not introduce new wildfire risks. The revised project maintains the same development footprint and land use type and would not alter the circulated IS-MND conclusion. No impact would occur.

Mandatory Findings of Significance

The circulated IS-MND found that the project would not substantially degrade the quality of the environment or substantially reduce biological, cultural, or tribal resources with mitigation. The revised project would introduce fewer units within the same development footprint and would not alter grading depths or disturbance areas, consistent with the prior analyzed construction methods and schedule. The site remains urbanized and lacks wildlife corridors or sensitive habitat mitigation measures defined in the circulated IS-MND would remain required. Because the revised project reduces the overall development density and would not expand ground disturbance, the revised project would not create new or more severe impacts compared to the circulated IS-MND, and impacts would remain less than significant with mitigation incorporated.

Conclusion

The revised project would not introduce new land use types or expand the previously analyzed development footprint; therefore, the revised project would not result in any new or increased severity of significant environmental effects beyond those identified in the circulated IS-MND. As such, no additional environmental review or documentation is required for the revised project under CEQA.

List of Preparers

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