



**CITY OF IRWINDALE  
PLANNING COMMISSION STAFF REPORT**  
COMMUNITY DEVELOPMENT DEPARTMENT  
PLANNING DIVISION



**Date:** March 16, 2022 **Agenda Item No. 3-B**

**To:** Honorable Chair and Members of the Planning Commission

**From:** Marilyn Simpson, AICP, Community Development Director

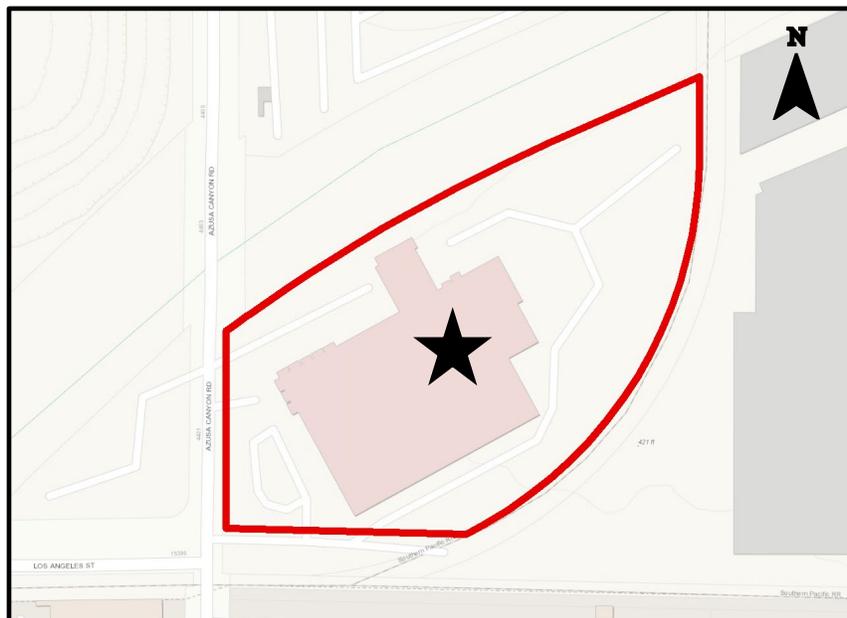
**Project Planner:** Brandi Jones, Senior Planner  
Lisa Chou, Associate Planner

**Project:** Site Plan & Design Review (DA) No. 04-2020  
Speculative 129,830 Square-Foot Concrete Tilt-Up Building

**Applicant:** Michael Ramirez, Rexford Industrial Realty, LLC

**Property Owner:** Rexford Industrial Realty, LLC

**Project Location:** 4416 Azusa Canyon Road (APN: 8417-004-006)



Map Date February 2022  
Source: ESRI, City of Irwindale

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**Staff Recommendation:** That the Planning Commission:

1) Adopt Resolution No 813(22) entitled “A Resolution of the Planning Commission of the City of Irwindale, Recommending that the City Council adopt the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP) for the Construction of one (1) Speculative Industrial Tilt-Up Building Totaling ±129,830 Square Feet For Property Located at 4416 Azusa Canyon Road, Irwindale, CA 91706 (APN: 8417-004-006) in the M-1 (Light Manufacturing) Zone and Making Certain Findings of Fact, Pursuant to the California Environmental Quality Act

2) Adopt Resolution No. 814(22) entitled, “A Resolution of the Planning Commission of the City of Irwindale Recommending that the City Council approve Site Plan and Design Review (DA) No. 04-2020 ) for the Construction of one (1) Speculative Industrial Tilt-Up Building Totaling ±129,830 Square Feet For Property Located at 4416 Azusa Canyon Road, Irwindale, CA 91706 (APN: 8417-004-006) in the M-1 (Light Manufacturing) Zone and Making Certain Findings of Fact; subject to the City Council adoption of the MND and MMRP and subject to the attached Conditions of Approval.

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## **REQUEST**

The Applicant is requesting a Site Plan and Design Review (DA) for the construction of a ±129,830 square-foot concrete tilt-up building and associated parking located at 4416 Azusa Canyon Road, within the City of Irwindale.

## **BACKGROUND/HISTORY**

Based on a review of historical information, the project site appears to have been used as an orchard from at least 1928 until around 1952, when the site became vacant. The current main building was constructed in 1956 and was used by PepsiCo as a bottling plant. The site is presently developed with one building of approximately 62,713 square feet in the western half of the site, a large metal shed north of the building, and a loading dock and large truck yard on the eastern portion of the site (LACOA 2021). The building is a single-story structure of concrete tilt-up construction on a concrete slab floor. The bottling plant ceased operation in December 2020 and the site has remained vacant.

On February 16, 2022, the Planning Commission conducted a duly noticed public hearing, closed the public hearing, and requested staff to provide more information on the traffic study and continued the meeting to a date uncertain. The transportation analysis from the technical appendices of the Mitigated Negative Declaration (MND) was routed to the Commissioners on February 17, 2022. The Commissioners also inquired about the difference between the preparation of the MND for the project instead of an Environmental Impact Report (EIR). In addition, the applicant team has taken Commissioner feedback from the February 16, 2022 public hearing and proposed some design changes. The full report, as presented during the February 16, 2022 Planning Commission meeting, is attached as Exhibit I.

## GENERAL PLAN AND ZONING

The site is designated in the General Plan as Industrial/Business Park. The property is currently zoned M-1 (Light Manufacturing). The following zones and uses surround the site:

Direction	Existing Land Use	Zoning District
North	Industrial Businesses	M-2, Heavy Manufacturing
South	Industrial Businesses	M-2, Heavy Manufacturing
East	Industrial Businesses	M-2, Heavy Manufacturing
West	Public Works Yard & Olive Pit	M-1, Light Manufacturing & Q, Quarry

## ENVIRONMENTAL REVIEW

In accordance with the California Environmental Quality Act, the City of Irwindale prepared an Initial Study to determine whether the proposed project may have a significant adverse effect on the environment. Based on the Initial Study and subsequent analysis, staff has determined that the project as proposed qualifies for a Mitigated Negative Declaration according to the California Environmental Quality Act (CEQA), pursuant to Section 15074 of the CEQA Guidelines.

Specifically, the impacts of the proposed project would be mitigated to less-than-significant levels with the implementation of the Mitigation Measures for the following areas:

- Air Quality
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Transportation
- Tribal Cultural Resources
- Mandatory Findings of Significance

The Initial Study, Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program are on file in the Community Development Department/Planning Division, City Hall and the Irwindale Public Library. The IS/MND (Exhibit "E") was posted and circulated for the required thirty (30) days for public review and comments (December 21, 2021 through January 19, 2022). (A copy of the above referenced documents are posted on the City's website at <https://www.irwindaleca.gov/575/4416-Azusa-Canyon-Road>).

The specific details of the mitigation methods are included in the Mitigation Monitoring and Report Program (MMRP).

A total of four (4) letters were received during the comment period. These comments were provided by: State of California Department of Transportation (Caltrans), Los Angeles County Sanitation District, Lozeau Drury, LLP and Teamsters Local Union No. 396. The comment letters and responses to comments have been included in the MND. An

additional letter from Lozeau Drury, LLP was received after the comment period on February 16, 2022.

Additionally, PlaceWorks and Urban Crossroads, the environmental consultants that prepared the MND and MMRP for the project, have prepared a detailed response (Exhibit H) to the letter dated February 16, 2022 from Lozeau Drury, LLP. The letter asserts that the IS/MND does not adequately analyze and mitigate air quality, greenhouse gas, hazards and hazardous materials, and transportation impacts and requests the preparation of an EIR.

The response prepared by PlaceWorks addresses each area of concern to fully disclose potential environmental impacts and mitigation which reduces impacts to below significance. It is the professional assessment and recommendation of PlaceWorks that an EIR is not required for this project. PlaceWorks has thoroughly analyzed the project and potential impacts and has determined that the mitigation measures and conditions of approval will avoid impacts to a point where no significant impacts on the environment would occur, therefore a Mitigated Negative Declaration was prepared for the project.

### ***Transportation***

Pursuant to City Council Resolution No. 2020-53-3163, wherein the City Council of the City of Irwindale adopted “Vehicle Miles Traveled” thresholds of significance for purposes of analyzing transportation impacts under CEQA Guidelines section 15064.3, Urban Crossroads conducted a transportation analysis as part of the analysis of the project within the MND. CEQA Guidelines Section 15064.3 identifies vehicle miles traveled (“VMT”) — meaning the amount and distance of automobile travel attributable to a project — as the most appropriate metric to evaluate a project’s transportation impacts.

Pursuant to the Office of Planning and Research (“OPR”) Technical Advisory on Evaluating Transportation Impacts in CEQA, absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. The Project was analyzed to generate or attract fewer than 110 trips per day, thus VMT analysis was screened out due to a presumption of less than significant impacts.

However, the City of Irwindale’s Policy Guidelines for Traffic Impact Reports requires that projects under go a Level of Service (“LOS”) analysis. Urban Crossroads estimated vehicle trips based on data from the ITE (Institute of Transportation Engineer) Trip Generation Manual, a nationally recognized source for estimating land use-specific trip generation, which is listed as a fundamental requirement within the City’s Policy Guidelines for Traffic Impact Reports. To account for the effects of truck traffic in the traffic analyses, vehicle mix data from the City of Fontana Truck Trip Generation Study was utilized to generate estimated truck trips.

The transportation analysis report found that improvements were needed at two intersections—Azusa Canyon Road/Los Angeles Street and Azusa Canyon Road/Arrow Highway—to provide an acceptable level of service at these locations. The recommendations and conditions of approval include contributions on a fair-share basis to address existing deficient operations (see Appendix I). The proposed signal control improvement at Azusa Canyon Road/Arrow Highway is based on the Project’s fair share of impacts, calculated to be 9%, with the Applicant agreeing to contribute \$550,000 to the new traffic signal. The Project is estimated to impact the Azusa Canyon Road/Arrow Highway intersection on a fair share basis of 2%, with the Applicant agreeing to contribute its fair share amount to the lane configuration and traffic signal phasing modification improvement. It is the professional assessment and recommendation of Urban Crossroads that these mitigation measures will reduce any impacts to less than significant levels and will significantly improve the existing levels of service at the intersections. These improvement requirements are incorporated in the Conditions of Approval.

Additionally, a project condition of approval requires that any proposed tenant(s) provide a site-specific trip generation technical memo demonstrating that the business will not exceed the maximum limit of allowable trips as studied by the transportation analysis. The condition also states that the City will regularly and continually monitor the actual trips generated by the project and enforce the maximum limit of allowable trips. The owner/applicant shall be solely responsible for all costs related to analyses, peer review, monitoring and enforcement.

**SITE PLAN AND DESIGN REVIEW**

Pursuant to the provisions of Chapter 17.70 (Site Plan and Design Review) of the Irwindale Municipal Code (IMC), “No person shall construct any building or structure or make structural and physical improvements, additions, extensions and/or exterior alterations, and no permit shall be issued for such construction until the site plan and design review has been submitted to, reviewed by, and approved in accordance with this chapter. The property may only be developed, used and maintained in accordance with the approved site plan and design review.”

***Development Standards***

<b>Development Standard</b>	<b>Minimum Requirement</b>	<b>Project Proposal</b>
<b>Front Yard Setback</b>	20'-0"	69'-0" – 105'-0"
<b>Side Yard Setback</b>	20'-0"	25'-0" – 160'-0"
<b>Rear Yard Setback</b>	N/A	48'-5" – 108'-11"
<b>Floor Area Ratio (F.A.R.)</b>	1.0:1.0	0.52:1.0
<b>Building Height<sup>1</sup></b>	35'-0"	39'-0"
<b>Landscaping</b>	10%	11%

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<sup>1</sup> Per IMC subsection 17.08.085 “Building Height” means the vertical distance from the finished grade of the lot to the highest average point of the building or structure.

<b>Parking</b>	116	123
<b>Truck/Trailer Parking</b>	N/A	N/A

***Project Description***

The proposed project is for the construction of a ±129,830 square-foot speculative concrete tilt-up building and associated passenger vehicle parking. The building consists of ±9,160 square feet of office, ±17,000 square feet of manufacturing and ±103,670 square feet of warehousing. The property has a gross square footage of 256,664 square feet (5.89 acres) and a net square footage of 251,096 square feet (5.76 acres). There is a required street dedication along Azusa Canyon Road of 5,568 square feet (0.13 acres). At this time, there is no prospective user.

***Tribal Consultation***

On May 10, 2021, the following tribes were notified pursuant to AB 52:

- Gabrieleno Band of Mission Indians–Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino/Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseno Indians

Three (3) responses were received. The Gabrielino/Tongva Indians of California Tribal Council requested that the tribe be notified if prehistoric materials or burial remains are found during construction. If burial remains are found, the tribe wants to engage in formal consultation. The Gabrieleno Band of Mission Indians–Kizh Nation provided tribal archive information identifying the high cultural sensitivity of the project site. To avoid impacting or destroying tribal cultural resources that may be inadvertently unearthed during the project's ground disturbing activities the tribe provided the City with measures to mitigate or avoid a significant effect on tribal cultural resources. The Santa Rosa Band of Cahuilla Indians responded that the tribe did not have any comments.

***Building Design/Design Guidelines***

The proposed project is a single-story building located on the former PepsiCo Bottling plant. The proposed tilt-up building incorporates many of the desired design elements from the Commercial and Industrial Design Guidelines. The layout, landscaping and design of the site also incorporated encouraged design principles. For example, the use of an authentic period style compatible with City context, new buildings that draw upon the fundamental characteristics of existing buildings in the City, façade depth of plans and variations on all sides, including varied rooflines, berms, meandering sidewalks and multi-layered landscaping.

The building incorporates tower elements as focal points and breaks up the expansive exterior walls with architectural projections and details around the windows. The vertical and horizontal reveals, arched windows and multi-color palette also work to add depth

and character to the building. The design is similar to many of the recently approved developments, which have been designed to closely adhere to the guidelines, while maintaining function and aesthetic uniqueness.

### **Design Enhancements**

Based on feedback from the Planning Commissioners, the applicant team revisited the designs for the sidewalk and water fountain. A meandering sidewalk along Azusa Canyon Road is now incorporated in the updated site plan. The applicant is also proposing a “Welcome to Irwindale” sign on the water fountain on the corner of Azusa Canyon Road and Los Angeles Street. A revised site plan and detail of the water fountain has been included in the project plans and attached to this report as Exhibit C.

### **Operation**

The prospective use is currently unknown but there are many potential uses that are permitted by right due to the current zoning designation. However, certain uses would not be allowed or would be subject to a Conditional Use Permit. These uses would require Planning Commission approval prior to operation and be subject to a set of Conditions of Approval and a signed Affidavit of Acceptance from the property owner and tenant acknowledging and agreeing to abide by the imposed conditions. Cold storage have been expressly prohibited for this site without further future environmental analysis. The overwhelming majority of new industrial development in the City is speculative.

### **Landscaping, Project Fencing and Screening**

Approximately 27,979 square feet (11%) of the project site is proposed to be landscaped in compliance with the “City of Irwindale Commercial and Industrial Design Guidelines” and the Zoning Code requirements for parking area landscaping. The proposed percentage meets and exceeds the required ten percent (10%) that is required within the Irwindale Municipal Code. The proposed landscape plan is comprised of a combination of parking lot shade trees, shrubs, and groundcover. An eight (8) foot high steel fencing is proposed which surrounds the majority of the property.

### **Access and Circulation**

Ingress and egress to the site are provided via a three (3) driveways, one fronting onto Azusa Canyon Road and the other two (2) fronting on Los Angeles Street. The proposed building is setback approximately 69’-0”, which will also accommodate projected queuing, thus avoid overflow onto Azusa Canyon Road and Los Angeles Street. A 20”-0” wide street dedication along Azusa Canyon Road is required.

### **Parking**

IMC Subsection 17.64.030.P(2) “Offices not providing customer service on the premises” requires a minimum one (1) parking space for each two (2) employees on the maximum (most workers) working shift or one (1) space for each 350 square feet of gross floor area, whichever is the greater and IMC Subsection 17.64.030(V) “Warehouse and storage buildings” requires one (1) parking space for each 1,000 square feet of the first 20,000 square feet of gross floor area, one (1) space for each 2,000 square feet for the next

20,000 square feet of gross floor area and one (1) space for each 4,000 square feet for all floor area over 40,000 square feet of gross floor area.

Based on the proposed square footage, the project requires 116 stalls and 123 stalls are being proposed [five (5) ADA stalls, ninety-seven (97) standard stalls and twenty-one (21) compact stalls]. There are no designated trailer stalls. All parking is surface parking; there are no proposed parking structures or subterranean lots.

### ***Building Height***

The maximum building height in the M-1 (Light Manufacturing) zone is 35'-0". Per IMC subsection 17.08.085 "Building Height" means the vertical distance from the finished grade of the lot to the highest average point of the building or structure. The rooflines vary from approximately 30'-7" to 35'-0" and the parapet walls, including the architectural features extend to a maximum height of 39'-0". IMC subsection 17.68.010 "Height of Penthouses and Roof Structures" allows parapet walls to be erected above the height limits prescribed.

### ***Signage***

IMC Section 17.56.050 "Signs" provides the maximum allowable sign area for freestanding and wall signs. Based on the approximate square footage of the medical office building, the allowable amount of wall signage would equate to ±1,298 square feet. Freestanding signs would be limited to 150 square feet regardless of building size. Like other recently approved, large-scale projects, Staff incorporates a Condition of Approval that requires the applicant to prepare a comprehensive sign program. The sign program includes but is not be limited to sign type, square footage allowances, placement, illumination, quantity, colors and materials.

## **ANALYSIS**

### ***Site Plan & Design Review Analysis***

Before any Site Plan and Design Review is approved, the applicant must show, to the satisfaction of the Planning Commission and the City Council, the existence of the following findings of fact. Staff has determined that the findings can be made based on the analysis below:

1. The proposed project is in conformance with the general plan, zoning ordinance, and other ordinances and regulations of the City.

The subject site is zoned M-1 (Light Manufacturing) and has a General Plan land use designation of Industrial/Business Park and Residential. The existing General Plan and Zoning designations are consistent, which eliminates the need for any legislative action such a Zone Change or General Plan Amendment. The project also meets the minimum development standards for the applicable zones, such as setbacks, height, floor area ratio (F.A.R), parking and aesthetic design without the need for a Zone Variance to accommodate a deviation from any measurable standards. The

prospective use is currently unknown but there are many potential uses that are permitted by right due to the current zoning designation, however certain uses would be not be allowed or would be subject to a Conditional Use Permit.

2. The proposed project is in conformance with any redevelopment plan and regulations of the community redevelopment agency and any executed owner's participation agreement or disposition and development agreement.

This finding is no longer applicable, as Irwindale Community Redevelopment Agency no longer exists. There are also no owner's participation agreement or disposition and development agreement involved.

3. The following are so arranged as to avoid traffic congestion, to ensure the public health, safety, and general welfare, and to prevent adverse effect on surrounding properties:

- a) Facilities and improvements,

The proposed building is setback approximately 69'-0" from vehicle ingress to accommodate projected queuing, thus avoiding overflow onto Azusa Canyon Road and Los Angeles Street. All structures and infrastructure improvements will be constructed to current code and completed prior to issuance of the Certificate of Occupancy.

- b) Pedestrian and vehicular ingress, egress, and internal circulation,

There is no proposed through-site access. The site is bordered by industrial buildings to the north, south, and east and the City's Public Works yard and Olive Pit to the west. Azusa Canyon Road and Los Angeles Street serve as the vehicular access to the site. There is also a required 20'-0" street dedication on Los Angeles Street.

- c) Setbacks,

The project has been designed to comply with and exceed the minimum required setbacks for the M-1 (Light Manufacturing) zone. The proposed front yard setbacks range from 20'-0" to 105'-0", exceeding the minimum requirement of 20'-0". The proposed side yard setbacks range from 25'-0" to 160'-0", exceeding the minimum requirement of 20'-0". The proposed rear yard setbacks range from 48'-5" to 108'-11", and there is no required rear yard setback when abutting non-residentially zoned properties.

- d) Height of buildings,

The maximum building height in the M-1 (Light Manufacturing) zone is 35'-0". Per IMC subsection 17.08.085 "Building Height" means the vertical distance from the finished grade of the lot to the highest average point of the building or structure. Per IMC subsection 17.68.010, parapet walls may be erected above the height limits. The rooflines vary from approximately 30'-7" to 35'-0" and the parapet walls, including the architectural features extend to a maximum height of 39'-0".

Nonetheless, the proposed buildings have been designed to complement the massing and height of the existing buildings in the area.

e) Signs,

Based on the approximate square footage of the speculative industrial building, the allowable amount of wall signage would equate to  $\pm 1,298$  square feet. Freestanding signs would be limited to 150 square feet regardless of building size. Like other recently approved, large-scale projects, staff incorporates a Condition of Approval that requires the applicant to prepare a comprehensive sign program. The sign program includes, but is not limited to, sign type, square footage allowances, placement, illumination, quantity, colors and materials.

f) Mechanical and utility service equipment,

Site has been designed to attractively screen all rooftop and surface level mechanical equipment and storage area. The parapet roof will provide adequate screening of any proposed rooftop equipment. During the permitting process, a line of sight study is required to substantiate proper screening. Mechanical equipment and storage areas are screened, out of public view and often with solid walls and landscaping.

g) Landscaping,

The landscaping requirement has been met through considered choices of plantings appropriate to the location, building type, and building scale. Approximately 27,979 square feet (11%) of the project site is proposed to be landscaped in compliance with the "City of Irwindale Commercial and Industrial Design Guidelines" and the Zoning Code requirements for parking area landscaping. The proposed landscape plan is comprised of a combination of parking lot shade trees, shrubs, and groundcover.

h) Grading,

Project has been designed to take advantage of the existing topography, thus reducing grading activities on site. A grading permit will be required and issued from Building and Safety.

i) Lighting,

All lighting is designed to complement the structures and oriented to properly illuminate the site as not to create "dark pockets" that could support nefarious activities or spill onto other properties, creating a nuisance. The premises will be secured with appropriate security lighting, to obtain a minimum of 1-foot candles over the entire site. A photometric lighting plan shall be submitted, subject to the review and approval of the Community Development Department and the Police Department.

j) Parking,

IMC Subsection 17.64.030.P(2) "Offices not providing customer service on the premises" requires a minimum one (1) parking space for each two (2) employees

on the maximum (most workers) working shift or one (1) space for each 350 square feet of gross floor area, whichever is the greater and IMC Subsection 17.64.030(V) "Warehouse and storage buildings" requires one (1) parking space for each 1,000 square feet of the first 20,000 square feet of gross floor area, one (1) space for each 2,000 square feet for the next 20,000 square feet of gross floor area and one (1) space for each 4,000 square feet for all floor area over 40,000 square feet of gross floor area. Based on the proposed square footage, the project requires 116 stalls and 123 stalls are being proposed [five (5) ADA stalls, ninety-seven (97) standard stalls and twenty-one (21) compact stalls]. All parking is surface parking; there are no proposed parking structures or subterranean lots.

k) Drainage,

A Water Quality Management Plan (WQMP) has been prepared to address hydrology and drainage.

l) Intensity of land use.

The project is located on a flat, irregularly shaped lot. It had been used as an orchard from at least 1928 until around 1952, when the site became vacant. The current main building was constructed in 1956 and was used by PepsiCo as a bottling plant. The site is presently developed with one building of approximately 62,713 square feet in the western half of the site, a large metal shed north of the building, and a loading dock and large truck yard on the eastern portion of the site (LACOA 2021). The building is a single-story structure of concrete tilt-up construction on a concrete slab floor. The metal shed was part of the old truck wash area that is connected to the building by an overhang. The bottling plant ceased operation in December 2020 and the site has remained vacant. The proposed building will be approximately 129,830 square feet with associated passenger vehicle parking, truck parking, and eighteen (18) loading docks. The proposed industrial warehouse building is consistent with the General Plan designation of Industrial/Business Park and Zoning designation of M-1 (Light Manufacturing), as well as adjacent industrial land uses.

4. The proposed development is consistent with applicable city design guidelines and historic design themes, and provides for appropriate exterior building design and appearance consistent and complementary to present and proposed buildings and structures in the vicinity of the subject project while still providing for a variety of designs, forms and treatments.

The proposed tilt-up building incorporates many of the desired design elements from the Commercial and Industrial Design Guidelines including but not limited to façade elements, roofs and parapets, materials and colors. The layout, landscaping and design of the site also incorporated encouraged design principles. For example, the use of an authentic period style compatible with City context, new buildings that draw upon the fundamental characteristics of existing buildings in the City, façade depth of plans and variations on all sides, including varied rooflines, berms, meandering sidewalks and multi-layered landscaping.

## **CONCLUSION**

It is recommended that the Planning Commission take the following action:

1. Adopt Resolution No. 813(22) recommending that the City Council adopt the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP);
2. Adopt Resolution No. 814(22) recommending that the City Council approve Site Plan and Design Review (DA) No. 04-2020 subject to the proposed Conditions of Approval to permit the proposed improvements as presented herein.

## **Alternative Actions:**

3. Request that staff prepare a resolution of denial based on recommended Findings of Fact to be brought back at the next regularly scheduled Planning Commission meeting for adoption; OR
4. Request that the applicant revise the project and continue the hearing to a date certain.

## **ATTACHMENTS**

- Exhibit A: Resolution No. 813(22)  
Exhibit B: Resolution No. 814(22) with Conditions of Approval  
Exhibit C: Project Plans  
Exhibit D: Street Dedication Exhibit  
Exhibit E: Memo to Planning Commission, dated February 10, 2022 with links to:  
Initial Study/Mitigated Negative Declaration (IS/MND) and Technical Appendices – Electronic Files also available via:  
<https://www.irwindaleca.gov/575/4416-Azusa-Canyon-Road>  
Exhibit F: Response to Comments  
Exhibit G: Mitigation Monitoring and Reporting Program (MMRP)  
Exhibit H: Response to the Lozeau Drury, LLP letter, dated March 7, 2022  
Exhibit I: 4416 Azusa Canyon Road Planning Commission Staff Report, dated February 16, 2022