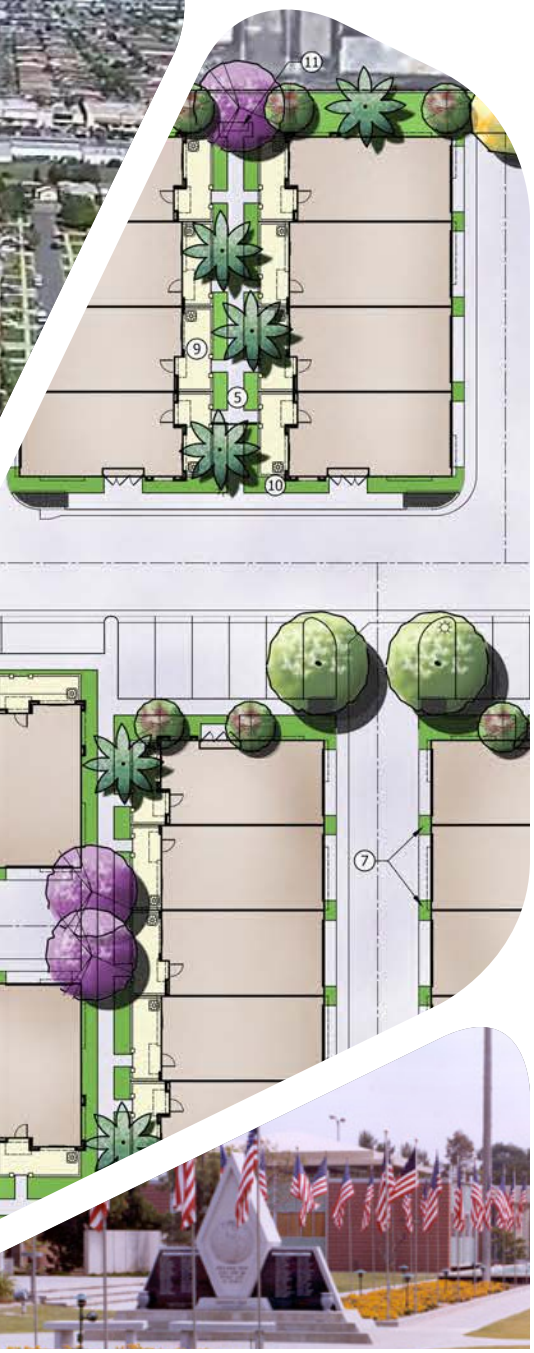
Stonefield 63 Project

Public Review Draft Initial Study/Mitigated Negative Declaration

November 2018



Prepared by

Kimley»Horn

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Stonefield 63 Project

Public Review Draft Initial Study/ Mitigated Negative Declaration

November 2018

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Table of Contents

Appendices

List of Exhibits

List of Tables

1.0

Introduction

1.0 INTRODUCTION

1.1 Statutory Authority and Requirements

This Initial Study has been conducted in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.). Pursuant to State CEQA Guidelines §15063, this Initial Study has been conducted to determine if the proposed Stonefield 63 Project ("Project") would have a significant effect on the environment. The approximately 3.9-acre Project site is located at 14031 South Vermont Avenue and 1017 West 141st Street. The Project proposes to remove all existing onsite structures and develop a residential community consisting of 63 three-story attached townhomes, at a density of 24.57 dwelling units per net acre (DU/net AC). The requested entitlements also include a Vesting Tentative Tract Map, General Plan Amendment, Zone Change, Site Plan Review, and Variance.

State CEQA Guidelines §15063(b) states that if the Lead Agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, the Lead Agency shall prepare an EIR, use a previously prepared EIR, or determine, which of a project's effects were adequately examined by an earlier EIR or negative declaration. Conversely, the Lead Agency shall prepare a Negative Declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

Pursuant to State CEQA Guidelines §15063(c), the purposes of an Initial Study are to:

1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.
2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.
3) Assist in the preparation of an EIR, if one is required;
4) Facilitate environmental assessment early in the design of a project;
5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;
6) Eliminate unnecessary EIRs; and
7) Determine whether a previously prepared EIR could be used with the project.

This Initial Study is intended to be used as a decision-making tool for the Lead Agency and responsible agencies in considering and acting on the proposed Project. Responsible agencies would comply with CEQA by considering this environmental analysis for discretionary actions associated with Project implementation, if any.

State CEQA Guidelines §15063(g) specifies that as soon as a Lead Agency has determined that an Initial Study will be required for the project, the Lead Agency shall consult informally with all Responsible Agencies and all Trustee Agencies responsible for resources affected by the project to obtain the recommendations of those agencies as to whether an EIR, Mitigated Negative Declaration, or a Negative Declaration should be prepared.

1.2 Summary of Findings

Pursuant to State CEQA Guidelines §15367, the City of Gardena ("City"), as the Lead Agency, has the authority for environmental review and adoption of the environmental documentation, in accordance with CEQA. This Initial Study has evaluated the environmental issues outlined in Section 3.2, *Environmental Factors Potentially Affected*. It provides decision-makers and the public with information concerning the Project's potential environmental effects and recommended mitigation measures.

Based on the Environmental Checklist Form and supporting environmental analysis, the Project would have no impact or a less than significant impact concerning all environmental issue areas, except the following, for which the Project would have a less than significant impact with mitigation incorporated:

- Hazardous Materials, and
- Noise.

As set forth in State CEQA Guidelines §15070, an Initial Study leading to a Mitigated Negative Declaration (IS/MND) can be prepared when the Initial Study identifies potentially significant effects, but: Project revisions would avoid the effects 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 (NOI) to Adopt a Mitigated Negative Declaration has been provided to the Clerk of the County of Los Angeles and mailed to responsible agencies and trustee agencies concerned with the 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 State CEQA Guidelines §15073. During the public review period, the IS/MND, including the technical appendices, was made available for review at the following locations:

- City of Gardena Community Development Department
  1700 West 162nd Street, Gardena
- City of Gardena Website: http://www.cityofgardena.org/

- Gardena Mayme Dear Library
  1731 West Gardena Boulevard, Gardena

In reviewing the IS/MND, affected public agencies and interested members of the 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:

Rita Garcia
Project Manager
Kimley-Horn
765 The City Drive, Suite 200
Orange, California 92868
Email: rita.garcia@kimley-horn.com

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 State CEQA Guidelines §15150, a 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 shall be considered to be set forth in full as part of the text of the Negative Declaration.

The references outlined below were utilized during preparation of this Initial Study. Copies of these documents are available for review at the City of Gardena Community Development Department (1700 West 162nd Street, Gardena) and on the City's website (http://www.cityofgardena.org/)

Gardena General Plan 2006. The City adopted the comprehensive Gardena General Plan 2006 (GGP) in 2006 and the Community Development Element's Land Use Plan was updated in June 2012 and March 2013. Additionally, the City's 2014-2021 Housing Element was adopted in November 2013 and found to be in compliance by the Department of Housing and Community Development in December 2013. The GGP constitutes the City's overall plans, goals, and objectives for land use within the City's jurisdiction. The GGP is based upon the following core visions for the City: City of Opportunity; Safe and attractive place to live, work and play; Community that values ethnic and cultural diversity; Strong and diverse economic base. It

evaluates the existing conditions and provides long-term goals and policies necessary to guide growth and development in the direction that the community desires. Through its Goals, Objectives, Policies, and Programs, the GGP serves as a decision-making tool to guide future growth and development decisions. The GGP consists of the following elements and the issues interrelated in each other and are summarized below:

- Community Development Element
    - Land Use Plan
    - Economic Development Plan
    - Community Design Plan
    - Circulation Plan
- Community Resources Element
    - Open Space Plan
    - Conservation Plan
- Community Safety Element
    - Public Safety Plan
    - Noise Plan
- Implementation
    - Implementation Program
- Housing Element

The GGP was used throughout this IS/MND as a source of baseline data.

City of Gardena General Plan 2006 Final Environmental Impact Report (GRC Associates, Inc., April 2006) (SCH #2005021125). The GGP Final Environmental Impact Report (GGP FEIR) analyzed the potential environmental impacts that would result from implementation of the GGP. At the time of the GGP FEIR's writing, the City was 98.5% developed. Approximately 45 acres of vacant land existed at the GGP FEIR's writing. GGP FEIR Tables 2 and 3 present the forecast capacity at the City's buildout as 22,329 DU, a population of 63,799 persons and approximately 18.9 million SF of nonresidential land uses. The buildout was estimated to occur over a 20-year period. The GGP GPEIR concluded (page 138) significant and unavoidable impacts concerning Transportation and Traffic.

Since preparation of the GGP FEIR, the fifth-cycle of the SCAG RHNA Allocation Plan, which was adopted in 2012, indicates that between 2014 and 2021, the City will need to accommodate the development of 397 units. The 2014-2021 Housing Element concluded adequate development capacity remained for the City to meet the RHNA allocation for the 2014-2021 planning period. On November 12, 2013, the City Council adopted Resolution No. 6106 approving the 2014-2021 Housing Element and the supporting Negative Declaration.

Gardena Municipal Code. The Gardena Municipal Code (GMC) regulates municipal affairs within the City's jurisdiction including, without limitation, zoning regulations (codified in GMC Title 18). GMC Title 18 is the primary tool for implementing the GGP's Goals, Objectives, and Policies. The GMC is referenced throughout this IS/MND to establish the Project's baseline requirements according to the City's regulatory framework.

1.5 Report Organization

This document is organized into the following sections:

Section 1.0 – Introduction provides an introduction and overview of the Project, cites the provisions of the CEQA Statute and Guidelines to which the proposed Project is subject, and summarizes the Initial Study'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 Initial Study's intended uses, including a list of anticipated permits and other approvals.

Section 3.0 – Environmental Checklist Form provides the Project background and an overview of the potential impacts that may or may not result from Project implementation.

Section 4.0 – Evaluation of Environmental Impacts contains an analysis of environmental impacts identified in the environmental checklist.

Section 5.0 – References identifies resources used to prepare the Initial Study.

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2.0

Project Description

2.0 PROJECT DESCRIPTION

2.1 Location

The Stonefield 63 (Project) site is in the County of Los Angeles (County), in the City of Gardena (City), approximately 9.5 miles south of downtown Los Angeles; see **Exhibit 2-1: Regional Vicinity Map**. The Project site is directly across from the City of Los Angeles. The Project site involves a 3.9-acre lot comprised of two parcels (APN 6115-017-036 and 6115-018-004), located at 14031 South Vermont Avenue and 1017 West 141st Street; see **Exhibit 2-2: Site Vicinity Map**.

Regional access to the Project site is provided via the Glenn Anderson Freeway (Interstate 105 (I-105)), the Artesia Freeway (State Route 91 (SR-91)), and the Harbor Freeway (State Route 110 (SR-110) located to the north, south, and east, respectively. Local access to the Project site is provided via South Vermont Avenue and a gated entry at the easterly West 141st Street cul-de-sac. A single driveway exists along the site's easterly frontage; however, a wall blocks its access.

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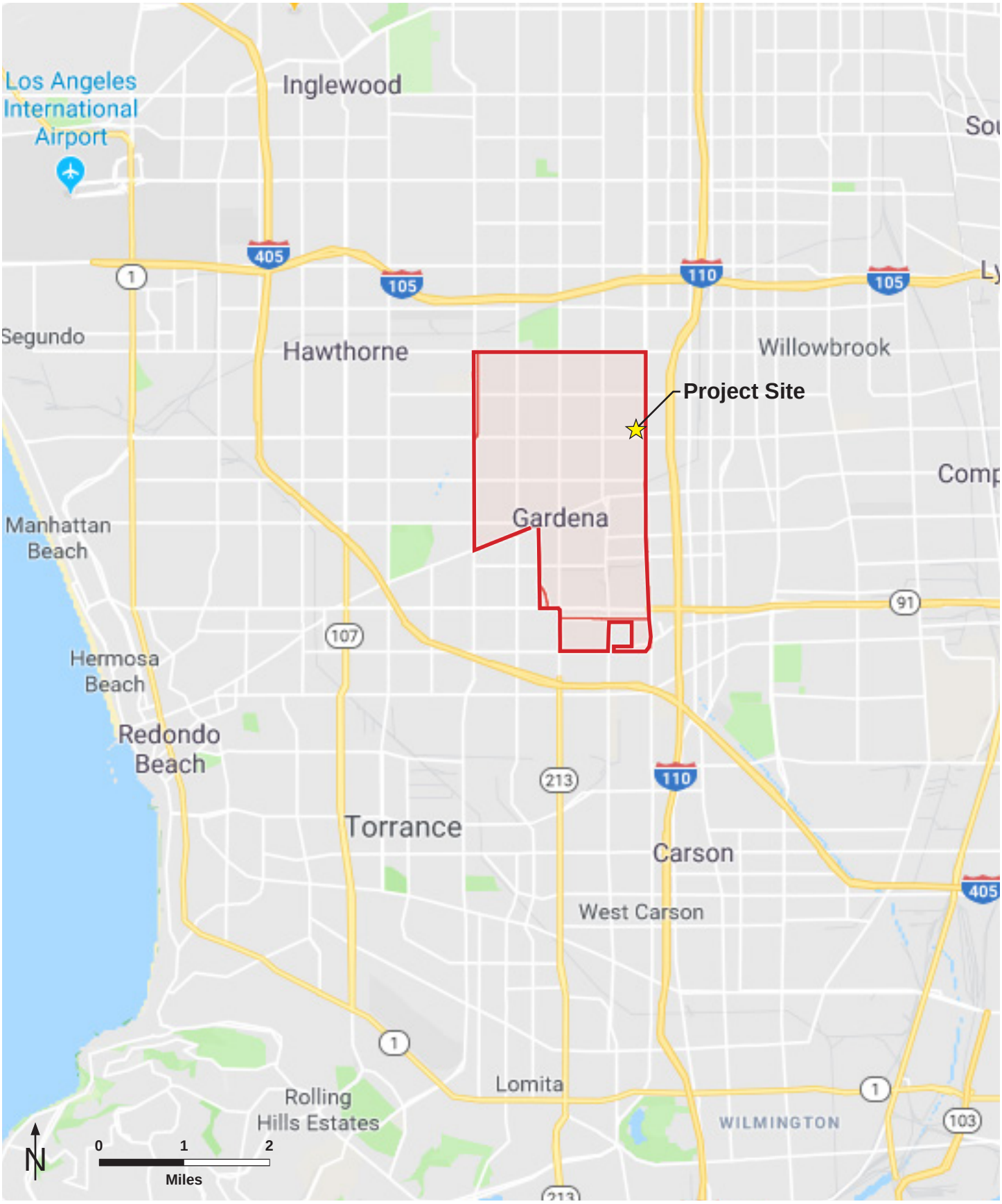

Source: Google Maps

Exhibit 2-1
Regional Vicinity Map

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Source: Google Earth

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2.2 Environmental Setting

Gardena, which encompasses approximately 6 square miles, is in the County's South Bay region. Gardena is a fully urbanized city. The City is comprised of a mix of residential densities, although low density residential uses predominate. The City also contains a mix of retail commercial, office, and industrial uses.

The Project site is in the City's northeast quadrant, in a predominantly commercial and residential area. The site is bounded by commercial uses on the north, commercial uses on the south, South Vermont Avenue on the east, and single-family residential uses on the west. South Vermont Avenue forms the City's eastern boundary, with the City of Los Angeles immediately to the east (for approximately 0.5 mile).

2.2.1 ONSITE LAND USES

The generally rectangular-shaped property slopes gently to the southwest and is located at approximately 64 feet above mean sea level (amsl).[1] As depicted on **Exhibit 2-2**, the site is fully improved and developed primarily as an asphalt surface parking lot. Additional onsite improvements include two single-story buildings (i.e., wood shop/storage and office/storage totaling approximately 9,940 square feet[2] (SF)) along South Vermont Avenue, and a lookout tower. Ornamental landscaping and light poles are scattered throughout the parking lot. Five shipping containers used for Larry Flynt's Lucky Lady Casino (casino) furniture storage are situated along the site's northern boundary, west of the wood shop.

The onsite surface parking lot originally operated as excess parking for the casino. As such, it did not serve as part of the parking supply required for the casino to meet the City's minimum parking standards.[3] The casino currently operates/uses the onsite wood shop/storage, office/storage, and shipping containers.

A vehicle repossession/auction company (i.e., South Bay Auto Auction) currently utilizes the onsite surface parking lot. This company, which stores approximately 400 vehicles on the lot, operates Monday, Wednesday, Thursday, and Friday, between 9 AM and 5 PM.

[1] KB Home Southern California. (2018). *Draft Phase I Environmental Site Assessment Report Parking Lot and Support Structures Associated with Lucky Lady Casino 1017 West 141st Street Gardena, California 90247*. Redlands, CA: Stantec Consulting Services, Inc.

[2] KB Home Coastal Inc. (2018). *Construction Information Request Form*. Page 1. Valencia, CA: KB Home Coastal, Inc.

[3] Josh Wheeler, personal communication [to David Lelie], August 21, 2018.

2.2.2 GENERAL PLAN AND ZONING

GGP Figure LU-2, *Land Use Policy Map*, depicts the City's land use designations and indicates the Project site is designated General Commercial. The General Commercial designation provides for a wide range of larger scale commercial uses to serve the needs of the City and region.[4]

The City of Gardena Zoning Map depicts the City's zones and indicates the Project site is zoned General Commercial Zone (C-3). The C-3 Zone is intended for general commercial uses; see GMC §18.32.010: General Commercial Zone (C-3).

2.2.3 SURROUNDING LAND USES

Land uses surrounding the Project site are described, as follows (see **Exhibit 2-2**):

- *North:* Land uses north of the Project site include a recreational vehicle (RV) park and general commercial uses (i.e., neighborhood-serving retail) along South Vermont Avenue. The Carnelian Specific Plan, which is comprised of two-story single-family DU, is located north of the general commercial uses. Areas to the north are zoned C-3 Zone and Carnelian Specific Plan.
- *South:* Larry Flynt's Lucky Lady Casino and various neighborhood-serving general commercial uses are south of the Project site. Additional general commercial uses are located further south beyond West Rosecrans Avenue. Areas to the south are zoned C-3.
- *East:* South Vermont Avenue borders the site's eastern boundary. Median landscaping and parking is located between South Vermont Avenue's north and southbound travel ways. The median to the east in Gardena is zoned Open Space (O) Zone. General commercial uses (a hotel and neighborhood-serving) are located further east beyond South Vermont Avenue in the City of Los Angeles. As previously noted, the City of Los Angeles is to the east beyond South Vermont Avenue (for approximately 0.5 mile) and the City of Compton further east.
- *West:* Land uses west of the Project site include single-family and multi-family (i.e., duplex) residential land uses. Areas to the west are zoned Low Density Multiple-Family Residential (R-2) and Medium Density Multiple-Family Residential (R-3) Zones.

2.3 Background and History

As previously noted, the casino previously used the onsite surface parking lot as overflow parking, which is no longer needed. The casino continues to use the woodshop, office, and storage space.

[4] City of Gardena. (2006, Updated June 2012 and February 2013). *Gardena General Plan 2006*. Page LU-9. Gardena, CA: City of Gardena.

A vehicle repossession/auction company began operations on the surface parking lot in May 2017.

On June 12, 2018, the Project Applicant (KB Home Greater Los Angeles, Inc.) submitted their development applications to the City for the proposed Project. The City deemed these applications complete on September 3, 2018.

2.4 Project Characteristics

2.4.1 Project Overview

The Project Applicant seeks approval of the proposed Stonefield 63 Project. The Project proposes a residential community consisting of 63 three-story attached townhomes, at a density of 24.57 DU/net AC; see **Exhibit 2-3: Conceptual Site Plan**. The Project proposes to remove all existing onsite improvements, including the asphalt parking lot and two casino-related buildings (approximately 9,940 SF) and construct 63 attached townhomes in 14 buildings (approximately 123,060 SF), with between four and five DU per building. The proposed buildings would be wood-frame construction, with all major building elements providing at least a 1-hour fire-resistance rating. The maximum proposed building height would be 35 feet (to top of roof).

All garages would be located away from public view. Two of the fourteen buildings would front South Vermont Avenue and two would front the western site boundary. The interior units would front three courtyards creating a village-like setting. The Project proposes a total of 9,800 SF of private open space in ground level patios and 36,707 SF of common and general open space in courtyards, paseos, and a tot lot. Additionally, approximately 22,500 SF of landscaping is proposed throughout. A total of 160 parking spaces, including resident and guest parking, are proposed.

2.4.2 Landscaping

The proposed Overall Landscape Plan[5] would provide a total approximately 22,500 SF along the site perimeters and dispersed throughout. The proposed plantings would include: 24-inch box street/parking trees, 36- to 48-inch box trunk trees, 15-gallon 24-inch box theme/screen trees, 24- to 36-inch box palm trees, 15-gallon 36-inch box accent trees, 15-gallon vines, marathon turf, and common area shrub/vines/groundcover.

[5] Available for review at the City of Gardena Community Development Department, 1700 West 162nd Street, Gardena.

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Source: Google Maps

Exhibit 2-3
Conceptual Site Plan

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2.4.3 Parking and Access

GMC §18.40.040: Number of Parking Spaces Required, specifies multiple-family DU require two spaces in a garage or enclosed parking facility per DU, resulting in a total resident parking demand of 126 spaces. The Project proposes two garage spaces per DU, or a total of 126 resident parking spaces, thus, meeting the City's resident parking standard. GMC §18.40.070: Additional Standards for Residential Parking Areas, requires that guest parking be provided for residential developments of more than one unit at 0.5 spaces per DU, resulting in a total guest parking demand of 32 spaces. The Project proposes a total of 34 guest parking spaces, thus, meeting the City's guest parking standard.

Vehicular access to the Project site is proposed via a two-way driveway (right turn in/out) at the easterly West 141st Street cul-de-sac, from South Vermont Avenue. No vehicular access is proposed via the westerly West 141st Street cul-de-sac. Pedestrian access is proposed via the easterly West 141st Street cul-de-sac and a walkway from South Vermont Avenue adjacent to the proposed driveway.

2.4.4 Utilities and Infrastructure

Golden State Water Company (GSWC) would purvey water to the proposed Project, with connection proposed at two points: a 6.0-inch main within West 141st Street (at the site's southwest corner), and an 8-inch main within South Vermont Avenue.

Access to the City's sanitary sewer system would be provided with connection to an existing 8-inch line within West 141st Street, at the site's southwest corner. The wastewater would flow west to Budlong Avenue. The proposed Project would be within the jurisdictional boundaries of Los Angeles County Sanitation District No. 5.

Proposed drainage improvements include two subsurface detention basins and two biofiltration planters, at the eastern and western portions of the Project site. In the proposed condition, stormwater from the site's easterly one-third would outlet to West 141st Street via a single parkway culvert.[6] Stormwater would then drain west in the street/ribbon gutter and would be intercepted by an existing Los Angeles County Flood Control District (LACFCD) catch basin. Stormwater from the site's westerly two-thirds would outlet to West 141st Street via a single parkway culvert, then drain west to the existing LACFCD catch basin. The Project's proposed hydrology and drainage is further discussed in Response 4.9 below.

[6] Forma Engineering, Inc. (October 2018). *Preliminary Hydrology & LID Report*. page 2. San Fernando, CA: Forma Engineering, Inc.

2.4.5 Requested Entitlements

The Project requests approval of the following entitlements:

- General Plan Amendment GPA #1-18 to change the GGP land use designation from General Commercial to High Density Residential,
- Zone Change ZC #2-18 to change the zoning from General Commercial (C-3) to High-Density Residential (R-4),
- Vesting Tentative Tract Map (VTTM) #082263[7] to create 63-townhome lots
- Site Plan Review SPR #8-18 to approve the proposed Site Plan, and
- Variance VAR #1-18 to approve the proposed 6.0-foot tall wall for perimeter fencing along South Vermont Avenue.

2.5 Project Construction Activities and Phasing

Project construction would occur beginning June 2019 and ending April 2021, in the following sequence:

- Demolition,
- Site preparation (vegetation removal),
- Grading,
- Building construction, and
- Paving, architectural coating, and landscaping.

Grading for the proposed improvements would require cut and fill to create building pads. Grading is estimated to require approximately 7,993 cubic yards of soil import. Final grading plans would be approved by the City Engineer before Grading Permit issuance. All infrastructure (i.e., stormdrain, water, wastewater, dry utilities, and street improvements) would be installed during grading.

Home construction would occur over approximately six phases, the timing of which would be dependent upon market conditions. For purposes of this environmental analysis, opening year is assumed to be 2021.

2.6 Agreements, Permits, and Approvals

The City, as Lead Agency, has discretionary authority over the proposed Project. Other agencies in addition to the City of Gardena are expected to use this IS/MND in their decision-making process. To implement this Project, at a minimum, the following discretionary permits/approvals must be granted by the City and others:

[7] Available for review at the City's Community Development Department, at 1700 West 162nd Street, Gardena.

- Environmental Assessment EA #13-18,
- General Plan Amendment GPA #1-18,
- Zone Change ZC #2-18,
- Site Plan Review SPR #8-18,
- Variance VAR #1-18,
- Vesting Tentative Tract Map #082263, and
- Los Angeles Regional Water Quality Control Board (National Pollutant Discharge Elimination System (NPDES) Compliance / Low Impact Development (LID)) approvals.

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3.0

Environmental Checklist Form

3.0 ENVIRONMENTAL CHECKLIST FORM

3.1 Background

1.	**Project Title:** Stonefield 63 Project
2.	**Lead Agency Name and Address:** City of Gardena Community Development Department 1700 West 162nd Street Gardena, California 90247
3.	**Contact Person and Phone Number:** Rita Garcia Project Manager Kimley-Horn 765 The City Drive, Suite 200 Orange, California 92868 Email: rita.garcia@kimley-horn.com
4.	**Project Location:** County of Los Angeles, City of Gardena, 14031 South Vermont Avenue and 1017 West 141st Street
5.	**Project Sponsor's Name and Address:** Mr. David Lelie, LEED AP, Forward Planner KB Home Greater Los Angeles, Inc. 25152 Springfield Court, Suite 180 Valencia, California 91355
6.	**General Plan Designation:** General Commercial
7.	**Zoning:** General Commercial (C-3) Zone
8.	**Description of Project:** See Section 2.4, *Project Characteristics*.
9.	**Surrounding Land Uses and Setting:** North: General Commercial (C-3) Zone and Carnelian Specific Plan South: General Commercial (C-3) Zone East: South Vermont Avenue and Open Space (O) Zone West: Low Density Multiple-Family Residential (R-2) and Medium Density Multiple-Family Residential (R-3) Zones
10.	**Other public agencies whose approval is required (e.g., permits).** Los Angeles County Sanitation Department Los Angeles Regional Water Quality Control Board Los Angeles County Fire Department
11.	**Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, has consultation begun** No California Native American tribe has requested consultation; see also Response 4.17.

3.2 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the proposed 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.

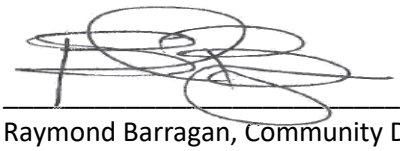
	Aesthetics		Agricultural Resources		Air Quality
	Biological Resources		Cultural Resources		Greenhouse Gas Emissions
	Geology & Soils	**X**	Hazards & Hazardous Materials		Hydrology & Water Quality
	Land Use & Planning		Mineral Resources	**X**	Noise
	Population & Housing		Public Services		Recreation
	Transportation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

3.3 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 GARDENA



Raymond Barragan, Community Development Manager

November 28, 2018
Date

4.0

Evaluation of Environmental Impacts

4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

The following environmental analysis is patterned after State 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
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) Substantially degrade the existing visual character or quality of the site and its surroundings?			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. No such conditions exist on or near the Project site. Additionally, the GGP does not specifically address scenic vistas. Therefore, the Project would not have an adverse effect on a scenic vista and no mitigation is 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. The area surrounding the Project site is predominately developed or planned for development with no natural landforms or scenic features remaining. There are no designated State or County designated scenic highways in the Project site vicinity.[8] Therefore, the Project would not damage scenic resources within a state scenic highway and no mitigation is required.

4.1c Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. The Project site is fully improved and developed primarily as an asphalt surface parking lot. Additional onsite improvements include two single-story buildings

[8] California Department of Transportation. (2011). *California Scenic Highway Mapping System.* Retrieved from http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

(i.e., wood shop/storage and office/storage). The Project site and its surroundings are characterized by commercial and residential uses, which predominate in the area. The Project proposes to remove all existing onsite improvements, including the asphalt parking lot and two casino-related buildings and develop a residential community consisting of 63 attached townhomes in 14 buildings at a density of 24.5 DU/AC. The maximum proposed building height would be 35 feet (to top of roof). Project implementation would alter the site's visual character, introducing a townhome development in place of a surface parking lot. However, the Project would not negatively impact or substantially degrade the visual quality of the site or its surroundings. While the Project would change the visual quality of the Project site by incorporating residential uses and taller buildings, this would not degrade the existing visual character, quality of the site, or surroundings. The site's visual character would be altered; however, the Project would not become visually incompatible or visually unexpected when viewed in the context of its urban surroundings. Moreover, the Project would be subject to compliance with GMC §18.42.095: Residential Design Criteria, concerning scale/massing, street-facing entries, architectural detailing, rooflines, garages, driveways, and parking, walls and fences, and materials, color, and texture, which would further the Project's compatibility with surrounding land uses. Therefore, the proposed Project would have a less than significant impact on the visual character of the site and its surroundings and no mitigation is required.

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 commercial, residential, and street lighting along South Vermont Avenue typical of urban areas. The proposed Project would generate lighting from two primary sources: lighting from building interiors that would pass through windows, and lighting from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting). The Project's outdoor lighting would be subject to compliance with GMC §18.42.150: Security and Lighting Plan, which the City requires to ensure that safety and security issues are addressed in the development's design, and that an average of two-foot candle with no single point less than 1-foot candle for all public/common areas. As part of the Project's Site Plan Review process and to review the Project's potential to adversely affect the surrounding area, the City's Community Development Department will review the proposed light standards' placement, height, and direction of illumination; see GMC §18.44.030: Factors for Approval. Further, the City would also review new lighting for conformance with the 2016 California Green Building Standards Code (CALGreen) (CCR Title 24 Part 11) such that only the minimum amount of lighting is used, and no light spillage occurs.[9] Consistent with City requirements, required landscaping may also help buffer and minimize light effects on adjacent land uses. Buildings with large facades constructed of reflective surfaces (e.g., brightly colored building façades, metal surfaces, and reflective glass) could increase existing levels of daytime glare. The Project's

[9] California Building Standards Commission. (2016). *2016 California Green Building Standards Code: California Code of Regulations Title 24, Part 11. International Code Council.*

proposed design does not include such surfaces or components. Therefore, the Project would result in a less than significant impact concerning a new source of light or glare and no mitigation is required.

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. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				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 §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §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 §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §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. No Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance is mapped in the City.[10] Further, the Project site is not the subject of a Williamson Act Contract.[11] The Project site is zoned General Commercial (C-3) and proposed to change to High-Density Residential (R-4). No agricultural, forest land, or timberland zoning exists in the City. Therefore, the Project would result in no impact concerning mapped farmlands, Williamson Act contracts, or agricultural, forest, or timber land zoning and no mitigation is required.

The Project site is fully improved with commercial uses and located within an urban area, along several roadways. No farmland, forest land, or timberland exist in the City. Therefore, the Project would not result in the conversion or loss of Farmland, forest land or timberland and no mitigation is required.

[10] California Department of Conservation. (2016). *California Important Farmland Finder.* Retrieved from https://maps.conservation.ca.gov/dlrp/ciff/.

[11] California Department of Conservation. (2016). *Williamson Act/Land Conservation Act.* http://www.conservation.ca.gov/dlrp/lca.

4.3 Air Quality

This Section is based on the *Air Quality Assessment* (Kimley-Horn, October 2018), which is included in its entirety in **Appendix A: Air Quality Assessment**.

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 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) Violate any air quality standard or contribute to an existing or projected air quality violation?			X	
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
d) Expose sensitive receptors to substantial pollutant concentrations?			X	
e) Create objectionable odors affecting a substantial number of people?			X	

SCAQMD Thresholds

The SCAQMD significance criteria may be relied upon to make the above determinations. According to the SCAQMD, an air quality impact is considered significant if a proposed project would violate any 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 thresholds of significance for air quality during project construction and operations, as shown in **Table 4.3-1: South Coast Air Quality Management District Emissions Thresholds**.

TABLE 4.3-1: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT EMISSIONS THRESHOLDS		
Criteria Air Pollutants and Precursors (Regional)	**Construction-Related**	**Operational-Related**
	Average Daily Emissions (pounds/day)	**Average Daily Emission (pounds/day)**
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM_{10})	150	150
Fine Particulates ($PM_{2.5}$)	55	55
Source: South Coast Air Quality Management District, *CEQA Air Quality Handbook,* 1993 ($PM_{2.5}$ threshold adopted June 1, 2007).		

Localized Carbon Monoxide

In addition to the daily thresholds listed above, the proposed Project would be subject to the ambient air quality standards. These are addressed though an analysis of localized CO impacts. The California 1-hour and 8-hour CO standards are:

- 1-hour = 20 ppm
- 8-hour = 9 ppm

The significance of localized impacts depends on whether ambient CO levels near the Project site exceed state and federal CO standards. The SCAB has been designated as attainment under the 1-hour and 8-hour standards.

Localized Significance Thresholds

In addition to the CO hotspot analysis, the SCAQMD developed Local Significance Thresholds ("LSTs") for emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ 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 site without expecting to cause or substantially contribute to an exceedance of the most stringent national or state 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 all projects that disturb 5.0 acres or less on a single day. The City of Gardena is located within SCAQMD SRA 3 (Southwest Coastal LA County). **Table 4.3-2: Local Significance Thresholds (Construction/Operations)** shows the LSTs for a 1.0-acre, 2.0-acre, and 5.0-acre project site in SRA 3 with sensitive receptors located within 25 meters of the Project site.

TABLE 4.3-2: LOCAL SIGNIFICANCE THRESHOLDS (CONSTRUCTION/OPERATIONS)				
Project Size	**Nitrogen Oxide (NO_X) – lbs/day**	**Carbon Monoxide (CO) – lbs/day**	**Coarse Particulates (PM_{10}) – lbs/day**	**Fine Particulates ($PM_{2.5}$) – lbs/day**
1.0 Acre	91/91	674/674	5/1	3/1
2.0 Acres	131/131	982/982	8/2	5/1
5.0 Acres	197/197	1,823/1,823	15/4	8/2
Source: South Coast Air Quality Management District. (July 2008). *Localized Significance Threshold Methodology*.				

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 EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (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 federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project site is located within the SCAB, which is under SCAQMD's jurisdiction. The SCAQMD is required, pursuant to the FCAA, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2016 AQMP is a regional and multi-agency effort including the SCAQMD, the CARB, the SCAG, and the EPA. The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's 2016 RTP/SCS, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's AQMP.

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

- **Consistency Criterion No. 1**: The proposed Project would 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 the AQMP's air quality standards or the interim emissions reductions.
- **Consistency Criterion No. 2**: The proposed Project would not exceed the AQMP's assumptions or increments based on the years of the Project buildout phase.

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As shown in **Tables 4.3-3, 4.3-4,** and **4.3-5** below, the Project would not exceed the short-term construction standards or long-term operational standards. Therefore, the Project would not violate any air quality standards. Thus, no impact would occur and no mitigation is required. The Project would be consistent with the first criterion.

Concerning Consistency Criterion No. 2, the AQMP 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. The Project involves General Plan Amendment GPA #1-18 to change the GGP land use designation from General Commercial to High Density Residential. The Project proposes development of 63 DU, resulting in an estimated population growth of approximately 181 persons. The proposed housing would be absorbed in part by the City's current housing demands. Additionally, the City of Gardena 2014-2021 Housing Element established goals and policies that anticipate population growth. The Project's forecast population growth would be nominal, and therefore, would not cause the SCAQMD's population or job growth projections used to develop the AQMP to be exceeded. Thus, a less than significant impact would occur, as the Project is also consistent with the second criterion. No mitigation is required.

4.3b Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact.

SHORT-TERM CONSTRUCTION

Project construction activities would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include ozone-precursor pollutants (i.e., ROG and NO_x) and PM_{10} and $PM_{2.5}$. Construction-generated emissions are short term and temporary, lasting only while construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading, road paving, 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.

The duration of construction activities associated with the proposed Project is estimated to last approximately 22 months. The Project's construction-related emissions were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. See **Appendix A of Appendix A** for more information regarding the construction assumptions used in this analysis. The Project's predicted maximum daily construction-related emissions are summarized in **Table 4.3-3: Construction-Related Emissions**.

As shown in **Table 4.3-3**, all criteria pollutant emissions would remain below their respective thresholds and no mitigation is required. While impacts would be considered less than significant, the proposed Project would be subject to compliance with SCAQMD Rules 402, 403, and 1113, described in the Regulatory Framework subsection above, to further reduce specific construction-related emissions.

TABLE 4.3-3: CONSTRUCTION-RELATED EMISSIONS (MAXIMUM POUNDS PER DAY)

Construction Year	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
2019	4.43	54.26	26.86	0.09	10.31	6.50
2020	20.90	21.26	20.26	0.04	2.00	1.30
SCAQMD Threshold	75	100	550	150	55	150
Exceed SCAQMD	**No**	**No**	**No**	**No**	**No**	**No**

Notes: SCAQMD Rule 403 Fugitive Dust applied. 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; cover stock piles with tarps; water all haul roads twice 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. See **Appendix A of Appendix A** for Model Data Outputs.

Source: CalEEMod version 2016.3.2. See **Appendix A of Appendix A** for model outputs.

LONG-TERM OPERATIONS

The Project's operational emissions would be associated with motor vehicle use and area sources, such as the use of landscape maintenance equipment and architectural coatings. Long-term operational emissions attributable to the proposed Project are summarized in **Table 4.3-4: Long-Term Operational Emissions**. Note that emissions rates differ from summer to winter because weather factors are dependent on the season and these factors affect pollutant mixing, dispersion, ozone formation, and other factors. As shown in **Table 4.3-4,** the Project's operational emissions would not exceed SCAQMD thresholds for any criteria air pollutants. Therefore, the Project's operational emissions would result in a less than significant long-term regional air quality impact and no mitigation is required.

Area Source Emissions

Area source emissions would be generated due to consumer products, architectural coating, hearths, and landscaping that were previously not present on the site. As shown in **Table 4.3-4**, the Project's unmitigated area source emissions would not exceed SCAQMD thresholds for either the winter or summer seasons. Therefore, a less than significant impact would occur and no mitigation is required.

TABLE 4.3-4: LONG-TERM OPERATIONAL EMISSIONS (MAXIMUM POUNDS PER DAY)						
Source	**Reactive Organic Gases(ROG)**	**Nitrogen Oxide(NO_x)**	**Carbon Monoxide (CO)**	**Sulfur Dioxide (SO_2)**	**Coarse Particulate Matter(PM_{10})**	**Fine Particulate Matter($PM_{2.5}$)**
Summer Emissions						
Area Source Emissions	1.65	0.95	5.61	0.01	0.10	0.10
Energy Emissions	0.03	0.28	0.12	0.00	0.02	0.02
Mobile Emissions	0.72	3.38	9.92	0.03	2.52	0.70
Total Emissions	**2.40**	**4.62**	**15.64**	**0.04**	**2.65**	**0.82**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Winter Emissions						
Area Source Emissions	1.65	0.95	5.61	0.01	0.10	0.10
Energy Emissions	0.03	0.28	0.12	0.00	0.02	0.02
Mobile Emissions	0.70	3.48	9.42	0.03	2.52	0.70
Total Emissions	**2.38**	**4.72**	**15.15**	**0.04**	**2.65**	**0.82**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Source: CalEEMod version 2016.3.2. See **Appendix A of Appendix A** for model outputs.						

Energy Source Emissions

Energy source emissions would be generated due to the Project's electricity and natural gas usage. The Project's primary uses of electricity and natural gas would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. As shown in **Table 4.3-4**, the Project's unmitigated energy source emissions would not exceed SCAQMD thresholds for criteria pollutants. As such, the Project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. Therefore, the Project's operational air quality impacts would be less than significant, and no mitigation is required.

Mobile Source Emissions

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern. NO_X and ROG react with sunlight to form O_3, known as photochemical smog. Additionally, wind currents readily transport PM_{10} and $PM_{2.5}$. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions have been estimated using CalEEMod, as recommended by the SCAQMD. The Project's trip generation estimates were based on the *Traffic Impact Analysis for the Stonefield 63 Project in the City of Gardena* (Traffic Impact Analysis) (Kimley-Horn, October 2018). Based on the Traffic Impact Analysis, the proposed Project would generate 343 average daily trips (ADT). As shown in **Table 4.3-4**, the anticipated mobile source emissions would not exceed SCAQMD thresholds for criteria pollutants. Therefore, the Project's air quality impacts

associated with mobile source emissions would be less than significant and no mitigation is required.

4.3c ***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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?***

Less Than Significant Impact.

CUMULATIVE SHORT-TERM CONSTRUCTION

The SCAB is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards and nonattainment for O_3 and $PM_{2.5}$ for Federal standards. As discussed above, the Project construction-related emissions by themselves would not have the potential to exceed the SCAQMD significance thresholds for criteria pollutants.

Since these thresholds indicate whether individual Project emissions have the potential to affect cumulative regional air quality, it can be expected that the Project-related construction emissions would not be cumulatively considerable. The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be utilized during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the SCAB, which would include related cumulative projects. As concluded above, the Project's construction-related air quality impacts would be less than significant. Compliance with SCAQMD rules and regulations would further minimize the proposed Project's construction-related emissions. Therefore, Project-related construction emissions, in combination with those from other projects in the area, would not substantially deteriorate the local air quality. The Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts and no mitigation is required.

CUMULATIVE LONG-TERM OPERATIONS

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

As shown in **Table 4.3-4**, the Project's operational emissions would not exceed SCAQMD thresholds. As a result, the Project's operational emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant and no mitigation is required.

4.3d 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 the single-family residences located approximately 50 feet (15 meters) to the west. To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction. 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]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific emissions.

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 4.3-5: Equipment-Specific Grading Rates** is used to determine the maximum daily disturbed acreage for comparison to LSTs. The appropriate SRA for the localized significance thresholds is the Southwest Coastal LA County area (SRA 3), since this area includes the Project site. LSTs apply to CO, NO_2, PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5.0 acres. Project construction is anticipated to disturb a maximum of 2.5 acres in a single day.

TABLE 4.3-5: 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	Graders	1	0.5	8	0.5
	Rubber Tired Dozers	1	0.5	8	0.5
	Scrapers	0	1.0	8	0
	Tractors/Loaders/Backhoes	3	0.5	8	1.5
				Total Acres Graded per Day	**2.5**

Source: CalEEMod version 2016.3.2. See **Appendix A of Appendix A** for model outputs.

The SCAQMD's methodology states that "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 single-family residences located 50 feet (15 meters) west of the Project site. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, as recommended by the SCAQMD, LSTs for receptors located at 25 meters were utilized in this analysis. **Table 4.3-6: Localized Significance of Construction Emissions** presents the results of localized emissions during Project construction.

TABLE 4.3-6: LOCALIZED SIGNIFICANCE OF CONSTRUCTION EMISSIONS (MAXIMUM POUNDS PER DAY)

Construction Activity	Nitrogen Oxide(NO_x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Demolition (2019)	35.78	22.06	7.28	2.50
Site Preparation (2019)	45.57	22.06	4.71	3.47
Grading (2019)	28.35	16.29	5.18	3.23
Building Construction (2019)	21.08	17.16	1.29	1.21
Building Construction (2020)	19.19	16.85	1.12	1.05
Paving (2020)	14.07	14.65	0.75	0.69
Architectural Coating (2020)	1.68	1.83	0.11	0.11
SCAQMD Localized Screening Threshold	131	982	8	5
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

Source: CalEEMod version 2016.3.2. See **Appendix A of Appendix A** for model outputs.

Table 4.3-6 shows that the emissions of these pollutants on the peak day of Project construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, the Project would result in a less than significant impact concerning LSTs during construction activities and no mitigation is required.

LOCALIZED OPERATIONAL SIGNIFICANCE ANALYSIS

LSTs for receptors located at 25 meters for SRA 3 were utilized in this analysis. As the Project site is 3.9-acres, the 2.0-acre LST threshold was conservatively used for the Project, as the size of the Project site is between the provided SCAQMD LST areas of 2.0 and 5.0 acres. The on-site operational emissions are compared to the LST thresholds in **Table 4.3-7: Localized Significance of Operational Emissions**. **Table 4.3-7** shows that the maximum daily emissions of these pollutants during Project operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, the Project would result in a less than significant impact concerning LSTs during operational activities and no mitigation is required.

TABLE 4.3-7: LOCALIZED SIGNIFICANCE OF OPERATIONAL EMISSIONS (MAXIMUM POUNDS PER DAY)				
Activity	**Nitrogen Oxide (NO_x)**	**Carbon Monoxide (CO)**	**Fine Particulate Matter ($PM_{2.5}$)**	**Coarse Particulate Matter (PM_{10})**
On-Site Emissions (Area Sources)	0.95	5.61	0.10	0.10
SCAQMD Localized Screening Threshold (adjusted for 2 acres at 25 meters)	131	982	2	1
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Source: CalEEMod version 2016.3.2. See **Appendix A of Appendix A** for model outputs.				

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 proposed 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 2016 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 approximately 100,000 ADT, 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 proposed Project considered herein would not produce the volume of traffic 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 ADT, it can be reasonably inferred that CO hotspots would not be experienced at any intersections in the Project vicinity resulting from 343 ADT (23 AM peak hour and 28 PM peak hour trips) attributable to the Project. Therefore, Project impacts concerning CO hotspots would be less than significant and no mitigation is required.

CONSTRUCTION-RELATED DIESEL PARTICULATE MATTER

Project construction would generate DPM emissions from the use of off-road diesel equipment required. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment would dissipate rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. The closest sensitive receptors to the Project site are located approximately 50 feet from the property boundary, and further from the major Project construction areas.

California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time. Construction would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than 5 minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. For these reasons, DPM generated by Project construction activities, in and of itself, would not expose sensitive receptors to substantial amounts of air toxics and the Project would result in a less than significant impact and no mitigation is required.

4.3e Would the Project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. 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 proposed Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the proposed Project would not create objectionable odors and no mitigation is required.

CUMULATIVE ANALYSIS

Cumulative Setting

The cumulative setting for air quality includes the City of Gardena and the SCAB. The SCAB is designated as a nonattainment area for state standards of ozone, PM_{10}, and $PM_{2.5}$. The SCAB is designated as a nonattainment area for federal standards of ozone and $PM_{2.5,}$ attainment and serious maintenance for federal PM_{10} standards, and is designated as unclassified or attainment for all other pollutants. Cumulative growth in population and vehicle use could inhibit efforts to improve regional air quality and attain the ambient air quality standards.

Cumulative Impacts

The SCAQMD's approach to assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with requirements of the FCAA and CCAA. As discussed above, the proposed Project would be consistent with the AQMP, which is

intended to bring the SCAB into attainment for all criteria pollutants. Since the Project's estimated construction and operational emissions would not exceed the applicable SCAQMD daily significance thresholds that are designed to assist the region in attaining both NAAQS and CAAQS, cumulative impacts would be less than significant, and no mitigation is required.

4.4 Biological Resources

This Section is based on the *Biological Resources Constraints Study* (Rincon Consultants, April 2018), which is included in its entirety in **Appendix B: Biological Resources Constraint Study.**

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 federally protected wetlands as defined by Section 404 of the Clean Water Act (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?***

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 federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

No Impact. The California Natural Diversity Data Base (CNDDB), Biogeographic Information and Observation System and United States Fish and Wildlife Service (USFWS) Critical Habitat Portal were reviewed to determine if any special-status wildlife, plant or vegetation communities are known or have potential to occur on-site. Other resources included the California Native Plant Society (CNPS) online Inventory of Rare and Endangered Plants of California (2018), California Department of Fish and Wildlife (CDFW) Special Animals List (April 2018), and the CDFW Special Vascular Plants, Bryophytes, and Lichens List (April 2018).

The subject property is fully improved and comprised of a surface parking lot. No natural habitat types are present on the property, and only palm species such as (*Washingtonia robusta*) and (*Washingtonia filifera)* are present. The surrounding areas include residential and commercial uses to the north and west, and commercial uses to the south and east. No natural habitat types are present on these surrounding areas, and only landscaping including ornamental vegetation such as Italian cypress (*Cupressus sempervirens*), oleander (*Nerium oleander*), eucalyptus (*Eucalyptus sp.*) and (*Pinus sp.*) is present. Based on review of the CNDDB, knowledge of the Project region, and existing and surrounding site conditions, no candidate, sensitive, or special-status plant or wildlife species, riparian habitat or other sensitive natural community, or wetlands are present on or adjacent to the Project site. Therefore, the Project would not have an adverse effect on any candidate, sensitive, or special-status plant or wildlife species, riparian habitat or other sensitive natural community, or wetlands and no mitigation is required.

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 and surrounding areas are fully improved/disturbed. Further, the Project site is not a recognized wildlife corridor, thus, site development would not impede fish or wildlife movement. Notwithstanding, the Project would result in removal of ornamental vegetation (i.e., trees and shrubs) on a portion of the Project site with the potential to support nesting migratory birds that are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC).

Under MBTA provisions, it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any migratory birds except as permitted by regulations issued by the USFWS. The term "take" is defined by USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture or collect" any migratory bird or any part, nest or egg of any migratory bird covered by the conventions, or to attempt those activities. In addition, the CFGC extends protection to non-migratory birds identified as resident game birds (CFGC §3500) and any birds in the orders Falconiformes or Strigiformes (birds-of-prey) (CFGC §3503). The onsite trees and vegetation could provide suitable nesting habitat for birds. To address potential impacts to migratory birds, the Project would be subject to compliance with the following Condition of Approval (COA), which addresses construction activities within the nesting season. Following compliance with this COA, the Project's potential impacts to nesting migratory birds would be less than significant and no mitigation is required.

COA **Nesting Migratory Birds.** During construction, grubbing, brushing, or tree removal shall be conducted outside of the state identified nesting season for migratory birds (i.e., typically March 15 through September 1), if possible. If construction activities cannot be conducted outside of nesting season, a Pre-Construction Nesting Bird Survey within and adjacent to the Project site shall be conducted by a qualified biologist within three days prior to initiating construction activities. If active nests are found during the Pre-Construction Nesting Bird Survey, a Nesting Bird Plan (NBP) shall be prepared by a qualified biologist and implemented during construction. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, monitoring, and reporting. The size and location of all buffer zones, if required, shall be based on the nesting species, nesting sage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity.

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

No Impact. GMC §13.60.080 requires a Trimming Permit, Tree Removal Permit, and/or a Tree Planting Permit for cutting, trimming, pruning, planting, removing, injuring or interfering with

any tree, shrub or plant upon any Street or Public Place of the City. As discussed above, the Project would involve removal of palm trees, however, this would occur entirely within the Project site. Therefore, the Project would not conflict with GMC §13.60.080 and no mitigation is required.

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. The Project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Therefore, no impact would occur and no mitigation is required.

4.5 Cultural Resources

This Section is based on the *Stonefield 63 Units Project Cultural Resources Report* (Rincon Consultants, Inc., October 2018), which is included in its entirety in **Appendix C: Cultural Resources Studies**. The Cultural Resources Report was peer reviewed by an independent third party (BCR Consulting, LLC, October 22, 2018) and deemed adequate for CEQA purposes.

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 as defined in §15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			X	
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	
d) 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 as defined in §15064.5?

No Impact. A California Historical Resources Information System (CHRIS) search was conducted to identify all previously conducted cultural resources work within the Project site and a 1.0-mile radius around it, and to identify previously recorded cultural resources within or near the Project site. Rincon conducted a field survey on October 4, 2018. Two buildings over 45 years in age were identified on the Project site (i.e., 1017 West 141st Street and 14031 South Vermont Avenue). Additionally, the Native American Heritage Commission (NAHC) was contacted on April 5, 2018 to request a review of the Sacred Lands File (SLF). The NAHC emailed a response on April 18, 2018 (**Appendix C**) and stated the results of the search were negative.

The two onsite buildings over 45 years in age were identified as ineligible for the CRHR and NRHP and thus no further management is required. No historic resources were identified within the Project site, from the records search, SLF search, and pedestrian survey. Additionally, no cultural resources have been identified within a 0.5-mile radius of the Project site. Therefore, the Project would not cause an adverse change in the significance of a historical resource and no mitigation is required.

4.5b ***Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?***

Less Than Significant Impact. No cultural resources were identified within the Project site from the records search, SLF search, and pedestrian survey. Additionally, no cultural resources have been identified within a 0.5-mile radius of the Project site. The Project site has been previously disturbed by past construction activities and no archaeological resources have been recorded in the site vicinity. Thus, the Project site is considered to have low archaeological sensitivity. Notwithstanding, the potential exists for the discovery of archaeological resources during ground disturbing activities. To address potential impacts to archaeological resources that may be discovered during ground-disturbing activities, the City imposes the following COA, which details the appropriate steps should cultural resources be encountered during ground-disturbing activities. Following compliance with this COA, the Project's potential impacts concerning the significance of an archaeological resource would be less than significant and no mitigation is required.

COA **Archaeological Resources.** Prior to initiation of ground-disturbing activities, field personnel shall be alerted to the possibility of buried prehistoric or historic cultural deposits. If cultural resources are encountered during ground-disturbing activities, work within a 100-foot radius of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service (NPS) 1983) shall be contacted immediately to evaluate the find. The archaeologist shall have the authority to stop or divert construction, as necessary. Documentation and treatment of the discovery shall occur in accordance with NPS standards. The significance of the find shall be evaluated pursuant to State CEQA Guidelines §15064.5. If the discovery proves to be significant, before construction activities resume at the location of the find, additional work such as data recovery excavation may be warranted, as deemed necessary by the archaeologist.

4.5c ***Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

Less Than Significant Impact. 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 history of the earth and its past ecological settings. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area. **Appendix D: Geotechnical Studies** states that sediments are disturbed to three feet depth. As a result, there is low potential for excavations that do not exceed 3.0 feet to encounter significant fossil resources. Deeper excavations could encounter Quaternary Alluvium (Qoa) deposits, which are located throughout the property (see **Appendix D** Figure 4). Elsewhere, such sediments have produced significant fossil discoveries. To address potential impacts to paleontological resources that may be discovered during ground-disturbing activities, the City imposes the following COA,

which details the appropriate steps should paleontological resources be encountered during ground-disturbing activities. Following compliance with this COA, the Project's potential impacts to a unique paleontological resource/site or geologic feature would be less than significant and no mitigation is required.

COA **Paleontological Resources.** For ground disturbances greater than 3.0 feet where sediments are known to produce significant fossil discoveries, prior to initiation of ground-disturbing activities, field personnel shall be alerted to the possibility of buried paleontological resources. If fossils or fossil bearing deposits are encountered during ground-disturbing activities, work within a 100-foot radius of the find shall halt and a professional vertebrate paleontologist shall be contacted immediately to evaluate the find. The paleontologist shall have the authority to stop or divert construction, as necessary. Documentation and treatment of the discovery shall occur in accordance with Society of Vertebrate Paleontology standards. The significance of the find shall be evaluated pursuant to the State CEQA Guidelines. If the discovery proves to be significant, before construction activities resume at the location of the find, additional work such as data recovery excavation may be warranted, as deemed necessary by the paleontologist.

4.5d ***Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?***

Less Than Significant Impact. No formal cemeteries are on or near the Project site. Most Native American human remains are found in association with prehistoric archaeological sites. As discussed previously, the Project site is not proximate to identified archaeological resources. Given the extent of disturbances from previous development, there is low potential for the Project's ground-disturbing activities to encounter human remains. Notwithstanding, if previously unknown human remains are discovered during the Project's ground-disturbing activities, a substantial adverse change in the significance of such a resource could occur. If human remains are found, those remains would require proper treatment in accordance with applicable laws, including State of California Health and Safety Code (HSC) §§7050.5-7055 and PRC §§5097.98 and 5097.99. HSC §§7050.5-7055 describe the general provisions for treatment of human remains. Specifically, HSC §7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during excavation of a site. HSC §7050.5 also requires that all activities cease immediately, and a qualified archaeologist and Native American monitor be contacted immediately. As required by State law, the procedures set forth in PRC §5087.98 would be implemented, including evaluation by the County Coroner and notification of the NAHC. The NAHC would designate the "Most Likely Descendent" of the unearthed human remains. If human remains are found during excavation, excavation would be halted near the find and any area that is reasonably suspected to overlay adjacent remains shall remain undisturbed until the County Coroner has investigated, and appropriate recommendations have been made for treatment and disposition of the remains. Following compliance with the

established regulatory framework (i.e., HSC §§7050.5-7055 and PRC§§ 5097.98 and 5097.99), the Project's potential impacts concerning human remains would be less than significant and no mitigation is required.

4.6 Geology and Soils

This Section is based on the Geotechnical Investigation (RMA GeoScience, October 2018), which is included in its entirety in **Appendix D: Geotechnical Studies**. The Geotechnical Investigation was reviewed by an independent third party (Haley Aldrich, October 23, 2018) and deemed adequate for CEQA purposes.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Expose people or structures to 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 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

Impact Analysis

4.6ai ***Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving 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.***

No 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). The proposed Project site is not located within an Alquist-Priolo Earthquake Fault Zone, and there are no known active faults on or immediately adjacent to the property.[12] Therefore, the Project would not expose people or structures to adverse effects involving rupture of a known earthquake fault and no mitigation is required.

4.6ii ***Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking?***

Less Than Significant Impact. The City is located between several active fault zones including the Compton Thrust Fault, Newport-Inglewood-Rose Canyon Fault Zone, Charnock Fault, and Los Alamitos Fault.[13] The closest zoned faults are the Newport-Inglewood Fault zone, located approximately 0.4 miles northeast of the Project site. Thus, the Project site is in an area of high regional seismicity. Ground shaking originating from earthquakes along active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. The region has experienced shaking from several earthquakes recorded back to 1812. The nearest large historic earthquake is the Northridge Earthquake that occurred in 1994, the epicenter of which is 7.6 miles from the Project site. Historic earthquakes with magnitudes of greater than or equal to 6.0 and have been epicentered within approximately 50 miles of the Project site.

The faults described above could cause moderate to intense ground shaking during the lifetime of the proposed Project. Additionally, the Project site has experienced earthquake-induced

[12] California Department of Conservation. (2015). *Earthquake Zones Required Investigation Inglewood Quadrangle. Retrieved from http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/INGLEWOOD_EZRIM.pdf.*

[13] California Department of Conservation. (2015). CGS Information Warehouse: Regulatory Maps. Retrieved from http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps.

ground shaking in the past and can be expected to experience further shaking in the future. Therefore, Project implementation could expose people or structures to potential substantial adverse effects involving strong seismic ground shaking. The intensity of ground shaking on the Project site would depend upon the earthquake's magnitude, distance to the epicenter, and geology of the area between the Project site and epicenter. Regulatory controls to address potential seismic hazards would be imposed on the Project through the permitting process. Pursuant to GMC Chapter 15.04, the City has adopted the 2016 California Building Standards Code (CBSC), subject to certain amendments and changes, including those that address seismic resistance. CBSC design standards correspond to the level of seismic risk in a given location and are intended primarily to protect public safety and secondly to minimize property damage. The Project would be subject to compliance with all applicable regulations in the most recently published CBSC (as amended by GMC Chapter 15.04), which specifies design requirements to mitigate the effects of potential earthquake hazards. Moreover, the Geotechnical Investigation has evaluated various geologic and seismic hazards (i.e., slope instability, liquefaction, total and differential settlement. and surface displacement due to faulting or seismically induced flooding) based on site-specific parameters. Geotechnical Investigation Chapter 3.00 makes preliminary recommendations concerning seismic design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Geotechnical Investigation concludes that the Project appears feasible from a geotechnical standpoint. A COA will be imposed on the Project requiring that the Applicant submit the Geotechnical Investigation and comply with its recommendations and any revisions deemed necessary by the City's Building Official. The Gardena Building Services Division will review construction plans for compliance with the GMC/CBSC and the Geotechnical Investigation's recommendations. Following compliance with standard engineering practices and design criteria, and the established regulatory framework (i.e., GMC and CBSC), which would be verified through the City's construction plan review process, the Project's potential impacts concerning exposure of people or structures to potential substantial adverse effects involving strong seismic ground shaking and secondary seismic hazards would be less than significant and no mitigation is required.

4.6iii Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. For liquefaction to occur, three criteria must be met: underlying loose, coarse-grained (sandy) soils, a groundwater depth of less than approximately 50 feet, and a potential for seismic shaking from nearby large-magnitude earthquakes. Depth to groundwater in the Project region is greater than 30 feet below ground surface and the Project site soils are relatively stiff or dense. Based on these conditions, the liquefaction hazard potential at the Project site is negligible. Moreover, according to the California Geological Survey Seismic Hazard Zones Map

(1999), the Project site does not lie in a liquefaction hazard zone. This is further substantiated by GGP Safety Element Figure PS-2, *Public Safety Plan*. Therefore, the Project's potential impacts concerning exposure of people or structures to potential substantial adverse effects involving liquefaction would be less than significant and no mitigation is required.

4.6iv Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, 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 California Geological Survey Seismic Hazard Zones Map (1999), the site does not lie in a landslide hazard zone. Since the site is relatively flat, earthquake-induced landsliding does not appear to be a hazard to the proposed development. Therefore, the Project would not expose people or structures to adverse effects involving landslides and no mitigation is required.

4.6b Would the Project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The site geology is composed of artificial fill and older alluvial deposits. Asphalt paving is present, overlying an 8.0 to 9.0- inch thick base that covers the site. Quaternary aged Older Alluvium Deposits are underlain by artificial fill material. Given the site's existing condition and previous history, the loss of topsoil is low. The site has been heavily disturbed and paved since the 1980's. Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. During construction, the Project would be subject to compliance with erosion and siltation control measures and the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, and all subsequent amendments) (Construction General Permit); see Response 4.9a. GMC §8.70.110.B.1 specifies that no Grading Permit shall be issued to construction projects that disturb one or more acres of soil without obtaining a *General Construction Activity Stormwater Permit* (GCASWP) from the State Water Resources Control Board. Further, the Project proposes hardscapes throughout most of the Project site, which could have a beneficial effect by stabilizing soils and containing them onsite. Following compliance with the established regulatory framework (NPDES and GMC), the Project's potential impacts concerning soil erosion and loss of topsoil would be less than significant and no mitigation is required.

4.6c ***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?***

4.6d ***Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?***

Less Than Significant Impact. The Project site would not be subject to seismically-induced liquefaction (see Response 4.6aiii) or landslides (see Response 4.6iv). The Geotechnical Investigation did not identify a potential for lateral spreading or collapse.

The Geotechnical Investigation concluded soils at shallow depths have a low expansion index, however, recommended additional expansion index and plasticity index testing at completion of rough grading to verify the properties of the near surface soils. As noted in Response 4.6aii, a COA will be imposed on the Project requiring that the Applicant submit the Geotechnical Investigation and comply with its recommendations and any revisions deemed necessary by the City's Building Official. The Gardena Building Services Division will review construction plans for compliance with the GMC/CBSC and the Geotechnical Investigation's recommendations, including those concerning expansive soils.

The site is not located within a zone of land subsidence according to the United States Geological Survey California Water Science Center website. The Geotechnical Investigation concluded the potential for land subsidence due to over pumping of groundwater or oil extraction is low.

Therefore, the potential impacts concerning subsidence and expansive soils would be less than significant and no mitigation is required.

4.6e ***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. Sewers would be available for disposal of Project generated wastewater; see Responses 4.18a, b, and e. The proposed Project would not utilize septic tanks or alternative waste water disposal systems. Therefore, no impact would occur in this regard and no mitigation is required.

4.7 Greenhouse Gas Emissions

This Section is based on the Greenhouse Gas Emissions Assessment (Kimley-Horn, October 2018), which is included in its entirety in **Appendix E: Greenhouse Gas Emissions Assessment**.

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	

CITY OF GARDENA ENERGY EFFICIENCY CLIMATE ACTION PLAN

The City of Gardena, in concert with the South Bay Cities Council of Governments (SBCCOG) developed the City's Energy Efficiency Climate Action Plan (EECAP) in 2015. The EECAP demonstrates the City's commitment to providing a more livable, equitable, and economically vibrant community and sub-region through implementation of energy efficiency measures and subsequent reduction of GHG emissions. By using energy more efficiently, Gardena seeks to support the local economy, create new green jobs, and improve the community's quality of life. The EECAP energy efficiency measures are intended to be implemented in coordination with the City's other planning and land use decisions. The EECAP measures establish goals and policies that incorporate environmental responsibility into its daily management of its community and municipal operations. The EECAP includes emissions inventories, reduction targets, future projections, community GHG reduction strategies, and municipal GHG reduction strategies. The EECAP identifies a 2020 reduction target of 15% below 2005 levels by 2020 and 49% below 2005 levels by 2035. **Table 4.7-1: Description of Greenhouse Gases** provides a description of terms used in the analysis.

TABLE 4.7-1: DESCRIPTION OF GREENHOUSE GASES	
Greenhouse Gas	**Description**
Carbon Dioxide (CO_2)	CO_2 is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO_2 is variable because it is readily exchanged in the atmosphere. CO_2 is the most widely emitted GHG and is the reference gas (Global Warming Potential of 1) for determining Global Warming Potentials for other GHGs.
Nitrous Oxide (N_2O)	N_2O is largely attributable to agricultural practices and soil management. Primary human-related sources of N_2O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N_2O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 120 years. The Global Warming Potential of N_2O is 298.
Methane (CH_4)	CH_4, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Methane is the major component of natural gas, approximately 87% by volume. Human-related sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH_4 include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH_4 is approximately 12 years and the Global Warming Potential is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year Global Warming Potential of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays approximately 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Global Warming Potentials range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. Global Warming Potentials for CFCs range from 3,800 to 14,400.
Sulfur Hexafluoride (SF_6)	SF_6 is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The Global Warming Potential of SF_6 is 23,900.
Hydrochlorofluorocarbons (HCFCs)	HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, HCFCs are subject to a consumption cap and gradual phase out. The United States is scheduled to achieve a 100% reduction to the cap by 2030. The 100-year Global Warming Potentials of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.

TABLE 4.7-1: DESCRIPTION OF GREENHOUSE GASES	
Greenhouse Gas	**Description**
Nitrogen Trifluoride (NF_3)	NF_3 was added to Health and Safety Code §38505(g)(7) as a GHG of concern. This gas is used in electronics manufacture for semiconductors and liquid crystal displays. It has a high global warming potential of 17,200.
Source: Compiled from: U.S. EPA, *Overview of Greenhouse Gases*, April 11, 2018 (https://www.epa.gov/ghgemissions/overview-greenhouse-gases); U.S. EPA, *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016*, 2018; Intergovernmental Panel on Climate Change, *Climate Change 2007: The Physical Science Basis*, 2007; National Research Council, Advancing the Science of Climate Change, 2010; U.S. EPA, *Methane and Nitrous Oxide Emission from*	

Impact Analysis

4.7a Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact.

SHORT-TERM CONSTRUCTION

The proposed Project would result in direct GHG emissions from construction-related activities. The approximate quantity of daily GHG emissions generated by construction equipment utilized to build the proposed Project is included in **Table 4.7-2: Construction-Related Greenhouse Gas Emissions**.

TABLE 4.7-2: CONSTRUCTION-RELATED GREENHOUSE GAS EMISSIONS	
Category	**$MTCO_2e$**
Total Construction Emissions	590
30-Year Amortized Construction	20
Source: CalEEMod version 2016.3.2. See **Appendix E** for model outputs.	

As shown in **Table 4.7-2**, Project construction-related activities would generate approximately 590 $MTCO_2e$ over the course of construction. Construction GHG emissions are typically summed and amortized over the lifetime of the Project (assumed to be 30 years), then added to the operational emissions.[14] The amortized Project emissions would be 20 $MTCO_2e$ per year. Once construction is complete, the generation of construction-related GHG emissions would cease.

[14] The Project lifetime is based on the standard 30-year 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).

LONG-TERM OPERATIONS

Operational or long-term emissions would occur over the life of the proposed Project. The Project's operational GHG emissions would result from direct emissions such as Project-generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to the Project site and wastewater from the Project site, the emissions associated with solid waste generated from the Project site, and any fugitive refrigerants from air conditioning or refrigerators. The Project's total operational GHG emissions are summarized in **Table 4.7-3: Project Greenhouse Gas Emissions**. As shown in **Table 4.7-3**, Project operational GHG emissions, combined with construction-related GHG emissions, would generate approximately 771 $MTCO_2e$ annually. The proposed Project would not exceed the SCAQMD GHG threshold of 3,000 $MTCO_2e$ per year, thus, Project-related GHG emissions would be less than significant and no mitigation is required.

TABLE 4.7-3: PROJECT GREENHOUSE GAS EMISSIONS

Emissions Source	$MTCO_2e$ per Year
Construction Amortized Over 30 Years	20
Area Source	14
Energy	167
Mobile	523
Waste	15
Water and Wastewater	32
Total	771
SCAQMD Project Threshold	3,000
Exceeds Threshold?	No

Source: CalEEMod version 2016.3.2. **See Appendix E** for model outputs.

4.7b Would the Project conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. In 2015, the City of Gardena adopted the EECAP to improve energy efficiency and reduce GHG emissions. To develop this EECAP, a GHG emissions inventory was conducted to determine baseline greenhouse gas emissions from the community and from municipal operations for calendar year 2005 and 2012. A forecast was made of business-as-usual emissions in the absence of any emissions reduction actions. This forecast was then adjusted to account for the emissions reduction expected from statewide policies. To meet the City's GHG reductions target, the City would implement the additional local energy efficiency and GHG reduction measures described in the EECAP. Reaching the emissions reduction goals requires that residents, businesses, and City government work together.

The proposed Project would be subject to compliance with all building codes in effect at the time of construction, which include energy conservation measures mandated by CBSC Title 24 – 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 2016 standards improved upon the 2013 standards for new construction of, and additions and alterations to, residential, commercial, and industrial buildings. The 2016 standards went into effect on January 1, 2017.

The Project proposes to incorporate several energy efficiency design features that would comply with CALGreen (CCR Title 24 Part 11) requirements that are consistent with the Climate Action Plan's efficiency measures. The Project is an infill development within an urbanized/developed area and would generate GHG emissions well below SCAQMD thresholds (771 $MTCO_2e/yr$). The proposed Project demonstrates consistency with EECAP goals, measures, and emission reduction targets. The proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce GHG emissions, including Title 24, AB 32, SB 32, and the CAP. Therefore, Project impacts would be less than significant, and no mitigation is required.

4.8 Hazards and Hazardous Materials

This Section is based on the Phase I Environmental Site Assessment Report (Stantec, October 2018) and the Pre-Demolition Asbestos and Lead-Based Paint Survey (Stantec, October 2018), which are included in their entirety in **Appendix F: Hazardous Materials Studies.** The Phase I Environmental Site Assessment Report and Pre-Demolition Asbestos and Lead-Based Paint Survey were peer reviewed (Kimley-Horn, October 2018) and deemed adequate for CEQA purposes.

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 §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 for people residing or working in the Project area?				X
f) For a project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area?				X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X

Impact Analysis

4.8a ***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. During demolition and construction, small quantities of potentially hazardous substances such as gasoline, diesel fuel, lubricants for machines, and other-petroleum-based products would be used on-site. Once operational, limited quantities of hazardous materials such as solvents, fertilizers, pesticides, and other materials used for regular household maintenance of buildings and landscaping would be utilized by homeowners within the Project. However, quantities of these materials would not be significant enough to pose a significant hazard to the public or the environment. Compliance with the established regulatory framework (including, among others, Department of Transportation provisions regulating the transport of hazardous materials) would minimize risks to the maximum extent practicable. Therefore, impacts concerning the Project's potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant and no mitigation is required.

4.8b ***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 With Mitigation Incorporated. Stantec performed a Phase I Environmental Site Assessment (ESA) of the Project site in conformance with the scope and limitations of American Society of Testing and Material (ASTM) Practice E1527. The ASTM E1527-13 standard indicates that the purpose of the Phase I ESA is to identify recognized environmental conditions (RECs), including historical recognized environmental conditions (HRECs), and controlled recognized environmental conditions (CRECs) that may exist at a Project site. The term "recognized environmental conditions" means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a Project site:

1. Due to any release to the environment;
2. Under conditions indicative of a release to the environment; or
3. Under conditions that pose a material threat of a future release to the environment.

The scope of work conducted during the Phase I ESA consisted of a visual reconnaissance of the Project site, interviews with key individuals, and review of reasonably ascertainable historical documents (i.e. aerial photographs, topographic maps, etc.). An environmental records search was performed, which identified sites within their respective ASTM E 1527-13 search radii of the Project site that may represent RECs, HRECs, or de minimis conditions. The potential for these sites to affect soil or groundwater quality at the Project site was determined based on one or more of the following factors: distance from the Project site, position of sites with respect to assumed groundwater flow direction, the native soils, and regulatory status. Based on these

factors, none of the sites identified in the environmental records search report are expected to affect soil or groundwater quality at the Project site. The environmental records search identified no RECs, HRECs, or de minimis conditions at or near the Project site.

The office building and storage garage located at the site's northeastern corner were constructed in circa 1952. In addition, given the age of these structures, asbestos containing materials (ACMs) and lead-based paint (LBP) are considered likely. Stantec recommended performing a comprehensive, pre-demolition ACM and LBP survey in accordance with the sampling criteria of the Asbestos Hazard Emergency Response Act (AHERA) prior to any activities with the potential to disturb building materials, and abating ACM and LBP accordingly. A Pre-Demolition Asbestos and Lead-Based Paint Survey (Stantec, October 2018) (ACM/LBP Survey) was performed at the Project site. The purpose of the ACM/LBP Survey was to evaluate the Project site for the presence of ACMs and LBP that could require special handling/disposal in accordance with applicable federal, state, and local regulations. ACM and LBP are potential health hazards. Federal, state, and local agencies regulate their condition, handling, and disposal.

Asbestos Containing Materials. ACM generally do not pose a health threat unless the asbestos fibers are disturbed and become airborne and inhaled. The ACM/LBP Survey was intended to identify suspect ACMs in accordance with the AHERA sampling guidelines, as outlined in 40 CFR Part 763. The location, condition, friability, and potential for suspect ACMs to be potentially disturbed were assessed and documented. Bulk samples of readily accessible suspect ACMs were collected and analyzed. ACM/LBP Survey Table 1 presents the findings of the laboratory analyses and indicates ACM was detected in three of the samples. Therefore, construction activities at the Project site could expose workers and the environment to ACM.

State of California Division of Occupational Safety and Health (DOSH) requires employers to implement specific work practices, which protect workers from airborne asbestos exposure, when materials are found to contain detectable concentrations of asbestos. Building materials, which contain even low levels of asbestos (trace amounts), can potentially generate concentrations of airborne asbestos fibers when disturbed. Therefore, the ACM/LBP Survey recommends that control measures be instituted by those disturbing ACMs, which adequately address worker health and safety during planned demolition activities involving these materials. The ACM/LBP Survey also recommends that ACMs be removed by a licensed abatement contractor prior to demolition, in accordance with all applicable laws, including Occupational Safety and Health Administration OSHA guidelines. Compliance with DOSH and OSHA requirements would protect construction workers and the environment from airborne asbestos exposure reducing potential impacts to less than significant.

It is noted that the asbestos survey was limited to accessible materials only and did not include underground utilities. Historically, certain concealed materials may be present within wall cavities (e.g., electrical wire wrapping, insulation materials, vapor barrier paper, gypsum board, joint compound, etc.) that contain asbestos, and some underground utility piping has been

known to contain asbestos (e.g. Transite pipe). Because the proposed demolition could include removal of on-site portions of underground utilities (i.e., storm drains, sewer, domestic water laterals, etc.), evaluation of the asbestos content of these components must be performed prior to their removal. Suspect materials identified in these locations are assumed positive for asbestos until sampling and analysis indicates otherwise. If during demolition suspect ACMs are discovered that were not included within the ACM/LBP Study, those materials are to be assumed positive for asbestos unless additional sampling, analysis, and/or assessment indicates otherwise. To address asbestos in underground utility piping proposed for removal and suspect ACMs discovered during construction that were not included within the ACM/LBP Study, Mitigation Measure (MM) HAZ-1 is recommended. Following compliance with MM HAZ-1, which requires that onsite underground utilities proposed for removal during demolition be evaluated to determine their asbestos content prior to their removal, and requires sampling, analysis, and/or assessment of ACMs discovered during construction, the Project would result in a less than significant impact.

Lead-Based Paint. Lead in paint generally does not pose a health threat unless it is disturbed or sufficiently deteriorated to produce dust, which may become airborne and inhaled or ingested. The condition of painted surfaces at the Project site was assessed in general accordance with United States, Housing and Urban Development (HUD) Guidelines Chapter 5. Paint in fair/poor condition presents the highest risk for lead exposure. Paint chip samples were collected and analyzed. ACM/LBP Survey Table 3 presents the findings of the laboratory analyses and indicates none of the paint chips sampled meet the definition of a LBP or have detectable concentrations of lead above the laboratory reporting limit. Therefore, no further action concerning LBP on the Project site is presently warranted. On March 5, 2018, Stantec advanced four asphalt cores throughout the asphalt parking lots to evaluate for the potential presence of Petromat. Petromat, which could contain ACM, is a stress absorbing fabric that is used to increase the strength and longevity of asphalt surfaces. No Petromat was observed in any of the asphalt cores.

Overall, the proposed Project would not 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. Impacts would be less than significant with mitigation incorporated.

MM HAZ-1 In accordance with National Emissions Standards for Hazardous Air Pollutants (NESHAP) guidelines, an asbestos evaluation shall be performed on onsite underground utilities proposed for removal that are known or suspected to have been constructed prior to 1980. If asbestos-containing materials (ACMs) are determined to be present, the materials shall be abated by a certified asbestos abatement contractor in accordance with SCAQMD regulations and notification requirements. Demolition and disposal of ACMs shall be completed in accordance with SCAQMD's Rule 1403 procedures.

4.8c ***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 0.46 mile north of the nearest school (located at 1048 West 149th Street, Gardena) and the proposed uses are residential, which would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. No impact would occur in this regard and no mitigation is required.

4.8d ***Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

No Impact. Government Code §65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the Department of Toxic Substances Control (DTSC). The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination, sites with known underground storage tanks (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. According to the DTSC Envirostor Database, the Project site is not included on the Cortese List. Therefore, no impact would occur in this regard and no mitigation is required.[15]

4.8e ***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 for people residing or working in the Project area?***

4.8f ***For a project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area?***

No Impact. The closest airport to the Project site is Hawthorne Municipal Airport, located approximately 2.43 miles to the northwest. The Project is not within 2.0 miles of a public airport or within an airport land use plan. Additionally, there are no private airstrips located within the Project vicinity. Therefore, the Project would not result in an airport or airstrip-related safety hazard for people residing or working in the Project area and no mitigation is required.

4.8g ***Would the Project impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan?***

Less Than Significant Impact. See Response 4.16e.

[15] Department of Toxic Substance Control. (2018). *Envirostor Database.* Retrieved from https://www.envirostor.dtsc.ca.gov/public/map/?global_id=19490135.

4.8h ***Would the Project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?***

No Impact. The Project site is in a developed urban area and it is not adjacent to any wildland areas. Therefore, the Project would not expose people or structures to a significant risk involving wildland fires and no mitigation is required.

4.9 Hydrology and Water Quality

This Section is based on the Preliminary Hydrology & LID Report (Forma Engineering INC., October 2018), which is included in its entirety in **Appendix G: Hydrology and Water Quality Studies.** The Preliminary Hydrology & LID Report was peer reviewed (Kimley-Horn, October 2018) and deemed adequate for CEQA purposes.

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?			X	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			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, in a manner which would result in substantial erosion or siltation on- or off-site.			X	
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.			X	
e) 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?			X	
f) Otherwise substantially degrade water quality?			X	
g) Place housing within a 100-year flood-hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
h) Place within a 100-year flood-hazard area structures which would impede or redirect flood flows?				X

Environmental Issue		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X
j)	Inundation by seiche, tsunami, or mudflow?				X

Impact Analysis

4.9a Would the Project violate water quality or waste discharge requirements?

4.9f Would the Project otherwise substantially degrade water quality?

Less Than Significant Impact.

SHORT-TERM CONSTRUCTION

The Project's construction-related activities would include excavation, grading, and trenching, which would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. Construction-related erosion effects would be addressed through compliance with the NPDES program's Construction General Permit. Construction activity subject to this General Permit includes any construction or demolition activity, including, but not limited to, clearing, grading, grubbing, or excavation, or any other activity that results in a land disturbance of equal to or greater than 1.0 acre. The Project would disturb approximately 3.9 acres, thus, would be subject to this General Permit. To obtain coverage under this General Permit, dischargers are required to file with the State Water Board the Permit Registration Documents (PRDs), which include a Notice of Intent (NOI) and other compliance-related documents. The General Permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion-control and sediment-control Best Management Practices (BMPs) that would meet or exceed measures required by the General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. GMC Chapter 8.70 addresses stormwater and runoff pollution control and is intended to reduce the quantity of pollutants being discharged to waters of the United States. GMC §8.70.110.B.1 specifies that no Grading Permit shall be issued to construction projects that disturb one or more acres of soil without obtaining a *General Construction Activity Stormwater Permit* (GCASWP) from the State Water Resources Control Board. The types of BMPs required would be based on the amount of soil disturbed, the types of pollutants used or stored at the Project site, and proximity to water bodies. An Erosion Control Plan may be required at the City's discretion, and if required, it must be submitted to the City for approval as a condition for Grading Permit issuance. Following compliance with NPDES and GMC requirements, the Project's

construction-related activities would not violate water quality or waste discharge requirements. A less than significant impact would occur in this regard and no mitigation is required.

LONG-TERM OPERATIONS

Urban stormwater runoff is covered under the municipal permit for Los Angeles County, the NPDES Municipal Separate Storm Sewer System (MS4) Permit for stormwater and non-stormwater discharges from the MS4 within Los Angeles County's Coastal Watershed (CAS004001, Order No. R4-2012-0175). Los Angeles County uses its Low Impact Development (LID) Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements. New development and redevelopment projects/activities subject to Los Angeles County's LID Ordinance include all development projects equal to 1.0 acre or greater of disturbed area and residential new or redeveloped projects that create, add, or replace 10,000 SF or greater impervious surface area. The Project involves approximately 3.9 acres of disturbed area and adds more than 10,000 SF of impervious surface area; as such, the Project is subject to Los Angeles County's LID Ordinance. GMC §8.70.110.B.2 specifies that new development subject to the MS4 Permit must comply with post-construction runoff pollution reduction BMPs implemented through the Standard Urban Stormwater Mitigation Plan (SUSMP). SUSMP conditions assigned by the City would consist of LID BMPs, source control BMPs, and structural and nonstructural BMPs for specific types of uses. LID controls effectively reduce the amount of impervious area of a completed project site and promote the use of infiltration and other controls that reduce runoff. Source control BMPs prevent runoff contact with pollutant materials that would otherwise be discharged to the MS4. Specific structural controls are also required to address pollutant discharges from certain uses including but not limited to housing developments, parking lots, and new streets, among others.

The Project's proposed drainage improvements include two subsurface detention basins and two biofiltration planters, at the eastern and western portions of the Project site. Infiltration is the first option in Los Angeles County when screening potentially feasible LID BMPs. Infiltration systems collect stormwater runoff and conduct it into permeable soils beneath the site; effectively reducing pollution, reducing runoff and flooding, and recharging groundwater. The underground infiltration trench was designed using the minimum feasible infiltration rate per the County of Los Angeles Guidelines for Design, Investigation, and Reporting Low Impact Development Storm Water Infiltration, GS200.1.

The Project would treat site runoff in accordance with the Los Angeles County Low Impact Development Manual, 2014. To do so, runoff resulting from the 85th percentile rain event would be treated prior to leaving the site. As determined from the Los Angeles County Hydrology GIS Maps, the 85-percentile rain event for the Project site is 0.95 inches, which is used as the design storm for LID. **Appendix G** Section 2.0 presents the hydrology methodology, water quality, design flowrates, and volumes. In addition, the Project site is divided into two subareas, each would treat runoff using separate LID BMPs to maintain the predeveloped drainage patterns. Following

compliance with NPDES requirements (i.e., Los Angeles County's LID Ordinance and GMC), which include LID BMPs, the Project's operational activities would not violate water quality or waste discharge requirements. Therefore, Project impacts would be less than significant and no mitigation is required.

4.9b ***Would the Project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?***

Less Than Significant Impact. The Project site is in GSWC's service area, and specifically, within the Southwest System service area, which serves Gardena, seven other cities, and portions of unincorporated Los Angeles County. Water supply sources for the Southwest System are imported water, GSWC operated groundwater wells, and recycled water. The Southwest System is supplied by two active, GSWC-owned wells in the Central Sub basin of the Coastal Plain of Los Angeles Groundwater Basin (Central Basin), and 12 active, GSWC-owned wells in the West Coast Sub basin of the Coastal Plain of Los Angeles Groundwater Basin (West Coast Basin). Groundwater pumping for the Southwest System in 2015 totaled 5,915 acre-feet (AF), with 430 AF originating from the Central Basin and 5,484 AF from West Coast Basin. Gallons per capita per day usage in 2015 measured 87 GPCD. Both the Central basin and West Coast Basin are adjudicated, thus, are subject to a maximum allowed pumping allocation for groundwater extraction across the entire basins.

Basin recharge occurs through percolation of precipitation and artificial recharge activities at spreading grounds, among other sources. The Project site is not within a designated groundwater recharge area. Additionally, the Project site was previously developed, and Project implementation would not increase the site's effective impervious area, as compared to pre-Project conditions. Instead, with Project implementation, the site's effective imperviousness would decrease from 98% to 85%. Thus, the Project would not reduce the maximum availability of stormwater for groundwater recharge through percolation of precipitation. As concluded in Response 4.18b, the Project's water demand would total approximately 17.63 acre-feet per year (AFY). GSWC maintains an allocation of 16,439 AFY from the Central Basin and 7,502 AFY from the West Basin. GSWC has confirmed that water service is available to the Project site from GSWC's Southwest District water system.[16] The adjudicated basins would continue to be subject to the maximum allowed pumping allocation for groundwater extraction. Continued diligence by the pumpers is expected to ensure the reliability of the Central Basin groundwater supplies. Therefore, the Project would not substantially deplete groundwater supplies or interfere

[16] J. Zhao, P.E., PhD., personal communication, February 27, 2018.

substantially with groundwater recharge. Project impacts would be less than significant in this regard and no mitigation is required.

4.9c ***Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?***

4.9d ***Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?***

4.9e ***Would the Project 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. In the pre-developed condition, approximately 29% of the site drains to the southeast towards Vermont Avenue, while the remaining 71% of area drains southwest to 141st Street and eventually to Budlong Avenue. **Appendix G** Section 2.2 further discusses the predeveloped site drainage condition.

In the developed/proposed condition, the drainage pattern would remain generally the same as the predeveloped condition. However, In the proposed condition, stormwater from the site's easterly one-third (Subarea 1) would outlet to West 141st Street via a single parkway culvert.[17] Stormwater would then drain west in the street/ribbon gutter and would be intercepted by an existing Los Angeles County Flood Control District (LACFCD) catch basin. Stormwater from the site's westerly two-thirds (Subarea 2) would outlet to West 141st Street via a single parkway culvert, then drain west to the existing LACFCD catch basin. **Appendix G** Tables 1A, 1B, and 1C summarize the predeveloped and developed condition runoff flowrates for the 25-year and the 50-year storm event. As indicated in **Appendix G** Tables 1A, 1B, and 1C, runoff flow rates under the developed condition would be less than under the predeveloped condition. For the 50-year event, runoff flow rates and volumes in Subarea 1 would decrease by -0.35 cubic feet per second (cfs) and -1,831 ft^3, and runoff flow rates and volumes in Subarea 2 would decrease by -0.69 cfs and -5,038 ft^3, respectively. Additionally, there are no streams or rivers near the Project site. Therefore, the Project would not substantially alter the existing drainage pattern of the site or area; therefore, impacts would be less than significant, and no mitigation is required.

[17] Forma Engineering, Inc. (October 2018). *Preliminary Hydrology & LID Report*. page 2. San Fernando, CA: Forma Engineering, Inc.

4.9g Would the Project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

4.9h Would the Project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Administration (FEMA) flood zone maps, the Project site is located within Zone X, an area of minimum flood risk, or 0.2% chance annually. No levees, reservoirs, rivers, or flood control channels are in the Project's vicinity that could potentially cause onsite inundation. Therefore, the Project would not place housing or structures within a 100-year flood hazard area. No impact would occur in this regard and no mitigation is required.

4.9i Would the Project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. No levees, reservoirs, rivers, or flood control channels are in the Project vicinity that could potentially cause onsite inundation. Therefore, the Project would not expose people or structures to risk involving flooding. No impact would occur in this regard and no mitigation is required.

4.9j Inundation by seiche, tsunami, or mudflow?

No Impact. Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. The Project site is approximately 7.0 miles northeast of the Pacific Ocean and there are no nearby bodies of standing water. Tsunamis and seiches do not pose hazards due to the Project site's inland location and lack of nearby bodies of standing water. Additionally, the Project site and surroundings are relatively flat, thus, no potential for mudflow. Therefore, the Project would not expose people or structures to inundation by seiche, tsunami, or mudflow No impact would occur in this regard and no mitigation is required.

4.10 Land Use 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) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X	
c) Conflict with any applicable Habitat Conservation Plan or Natural Community Conservation Plan?				X

Impact Analysis

4.10a Would the Project physically divide an established community?

No Impact. An example of a project that has the potential to divide an established community includes the construction of a new freeway or highway through an established neighborhood. The Project proposes a residential community consisting of 63 three-story attached townhomes, at a density of 24.57 DU/AC. Given its nature and scope, the Project would not physically divide an established community. No impact would occur in this regard and no mitigation is required.

4.10b Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. GGP Figure LU-2, *Land Use Policy Map*, depicts the City's land use designations and indicates the Project site is designated General Commercial. The General Commercial designation provides for a wide range of larger scale commercial uses to serve the needs of the City and region. The Project proposes a residential community consisting of attached townhomes, which would conflict with the intended uses for the General Commercial land use designation. Therefore, the Project proposes General Plan Amendment GPA #1-18 to change the GGP land use designation from General Commercial to High Density Residential.

The City of Gardena Zoning Map depicts the City's zones and indicates the Project site is zoned General Commercial Zone (C-3). The C-3 Zone is intended for general commercial uses. GMC §§18.32.020 and 18.32.030 identify the uses permitted and conditionally permitted in the C-3

Zone, respectively. The Project proposes a residential community consisting of attached townhomes, which are not permitted uses in the C-3 Zone. Therefore, the Project proposes Zone Change ZC #2-18 to change the zoning from General Commercial (C-3) to High-Density Residential (R-4). Additionally, Variance VAR #1-18 is required to approve the proposed 6.0-foot tall for perimeter fencing along South Vermont Avenue.

The minimum permitted density for the R-4 Zone is 20 DU/AC; see GMC §18.18.020.A. The Project proposes to develop a residential community on the approximately 3.9-acre site consisting of 63 three-story attached townhomes, at a density of 24.57 DU/AC, and therefore meets this requirement.

The Project proposes VTTM #082263 to create 63-townhome lots. GMC Chapter 17.16 establishes the procedures necessary for implementation of a VTTM and supplements Subdivision Map Act provisions. Therefore, VTTM #082263 is subject to compliance with GMC Chapter 17.16.

GMC §18.44.010 specifies that Site Plans are required to be submitted for any development project for which a General Plan Amendment, Zone Change, Conditional Use Permit, Variance, Tract Map, or other discretionary permit is being sought. The Project's requested entitlements include a General Plan Amendment, Zone Change, Variance, and Vesting Tentative Tract Map, as discussed above. The Site Plan would be approved (or conditionally approved), only after the City finds the proposed development, including its proposed uses and physical design, consistent with the GGP's intent and general purpose and GMC provisions. Additionally, the City must find that the proposed development would not adversely affect the area's orderly and harmonious development and the City's general welfare.

Therefore, following the City's approval of the requested entitlements (i.e., General Plan Amendment GPA #1-18, Zone Change ZC #2-18, Variance VAR #1-18, Site Plan Review SPR #8-18, and VTTM #082263, the Project would not conflict with the GGP or GMC. Impacts would be less than significant, and no mitigation is required.

4.10c ***Would the Project conflict with any applicable habitat conservation plan or natural community conservation plan?***

No Impact. See Response 4.4f.

4.11 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

4.11a 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?

4.11b 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. The Surface Mining and Reclamation Act of 1975 (SMARA) requires classification of land into mineral resource zones (MRZs) according to the known or inferred mineral potential of the area.[18] The Project site is not located in an area identified as a locally important mineral resource recovery site.[19] Further, the GGP does not identify the Project site as a locally-important mineral resource recovery site. Therefore, the proposed Project would have no impact concerning mineral resources and no mitigation is required.

[18] California Department of Conservation. (2018). *California Statutes and Regulations for the California Geological Survey*. Sacramento, CA: California Geological Survey.

[19] California Department of Conservation. (2015). *CGS Information Warehouse: Regulatory Maps.* Retrieved from http://maps.conservation.ca.gov/cgs/informationwarehouse/.

4.12 Noise

This Section is based on the *Noise Study* (Rincon Consultants, Inc., October 2018), which is included in its entirety in **Appendix H: Noise Studies.** The Noise Study was peer reviewed (Kimley-Horn, October 2018) and deemed adequate for CEQA purposes.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Exposure of persons to or generation of excessive ground borne vibration or groundborne noise levels?			X	
c) Substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?		X		
d) A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?		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 expose people residing or working in the Project area to excessive noise levels?				X
f) For a project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?				X

Refer to **Appendix H** Section 2.1 for an overview of sound measurement.

Existing Noise Environment

The most common and primary existing sources of noise in the Project site vicinity are motor vehicles (i.e., automobiles and trucks) along South Vermont Avenue and West Rosecrans Avenue. Motor vehicle noise is of concern because it is characterized by a high number of individual events, which often create a sustained noise level, and because of its proximity to noise-sensitive uses. Additional sources of noise in the Project site vicinity include activities associated with adjacent residential, retail, and commercial uses, including delivery trucks, landscaping

equipment, and general conversations. Existing sources of noise on the Project site are from vehicles parking and driving to and from the lot and general conversations.

To determine existing noise levels at the Project site, three 15-minute noise measurements (Leq [15] dBA) were taken near the Project site using an ANSI Type II integrating sound level meter on April 5, 2018. These measurements were taken between 4:00 PM and 6:00 PM to capture ambient noise levels at the Project site and at surrounding noise-sensitive receptors during the PM peak hour traffic period. Measurement Location 1 is located adjacent to the Project site's southwestern boundary, near the existing cul-de-sac at West 141st Street to capture ambient noise experienced by adjacent residences that are nearest the Project site. This measurement is representative of the estimated peak ambient noise level to, which future residences would be exposed along the Project site's western boundary. Measurement Location 2 is located adjacent to residences at 140th Place at Berendo Avenue intersection, northwest of the Project site. This measurement location is furthest from the arterial roadways near the Project site, West Rosecrans Avenue and South Vermont Avenue. Measurement Location 3 is approximately 160 feet east of the Project site, across South Vermont Avenue. This measurement is representative of the estimated ambient noise levels to which future residences would be exposed along the site's eastern boundary. The noise monitoring results are summarized in **Table 4.12-1: Noise Measurements** and noise measurement locations are shown in **Exhibit 4.12-1: Noise Measurement Locations**.

TABLE 4.12-1 – NOISE MEASUREMENTS

Site Number	Measurement Location	Time	Approximate Distance to Primary Noise Sources	L_{eq} [15] (dBA)[1]	L_{max} (dBA)
1	West 141st Street Cul-de-sac	4:36 PM – 4:51 PM	500 feet[2] 700 feet[3]	50.4	61.6
2	Corner of Berendo Avenue and 140th Place	5:29 PM – 5:44 PM	750 feet[2] 750 feet[3]	60.7	79.6
3	South Vermont Avenue	5:52 PM – 6:07 PM	75 feet[3]	70.0	85.2

Notes:

1. The equivalent noise level (Leq) is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a time period (essentially, the average noise level). For this measurement, the Leq was over a 15-minute period (Leq[15]).
2. Distance to centerline of West Rosecrans Avenue.
3. Distance to centerline of South Vermont Avenue.

Source: Rincon Consultants. (October 2018). *Noise Study for the Lady Luck, 63 Units Project (Gardena)*.

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Source: Noise Study, Lady Luck 63 Units Project (Gardena), Rincon Consultants, Inc. October 2018.

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The differences among measured noise levels shown in **Table 4.12-1** are generally due to the attenuating effects of distance and structural obstacles on noise as it propagates from the source, combined with the additive properties of noise converging from multiple sources. For example, Measurement Location 2 has the lowest ambient noise level because it is located within an existing neighborhood with no through street, where residences block line-of-sight to nearby arterial roadways. By contrast, Measurement Location 3 is directly exposed to traffic noise from an adjacent arterial roadway, South Vermont Avenue. As shown in **Table 4.12-1**, measured noise data indicates that noise levels are lower within the existing neighborhoods than along South Vermont Avenue.

Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Potentially sensitive land uses in Gardena include uses that have associated human activities that may be subject to stress or significant interference from noise. These include residences (including residences for the elderly), transient lodging (e.g., motels and hotels), schools, churches, and libraries. The predominant noise-sensitive land uses in the City are residences.

The neighborhood surrounding the Project site is characterized by a mix of commercial, retail, and residential uses. **Exhibit 4.12-1** shows the existing noise-sensitive receptors closest to the Project site, including the following:

- Single-family residences a minimum of 25 feet to the west,
- A church approximately 400 feet to the west,
- A church approximately 40 feet to the south,
- Single-family residences across South Vermont Avenue a minimum of 400 feet to the east,
- Single family residences approximately 100 feet to the north,
- A motel approximately 200 feet to the east,
- A nursing facility approximately 700 feet to the south,
- Multi-family residences approximately 700 feet to the southwest, and
- Single-family residences approximately 800 feet to the southeast.

Local Regulatory Setting

Gardena General Plan 2006

The Noise Plan within the GGP Community Safety Element presents the City's noise policies. GGP Figure N-1, *Noise and Land Use Compatibility*, indicates the CNEL considered acceptable for various land use categories. In general, exterior noise exposures at residential locations should not exceed a CNEL of 65 dB. **Table 4.12-2: Noise and Land Use Compatibility Matrix**, which shows the City's noise compatibility guidelines for various land uses, presents the GGP Figure N-1 data. The compatibility criteria indicate that residential land uses, such as the proposed Project, are considered normally acceptable with noise levels below 60 dBA CNEL and conditionally acceptable with noise levels of less than 65 dBA CNEL.

TABLE 4.12-2: NOISE AND LAND USE COMPATIBILITY MATRIX

Land Use Categories	Community Noise Equivalent Levels (CNEL, dBA)			
	Normally Acceptable[1]	Conditionally Acceptable[2]	Normally Unacceptable[3]	Clearly Unacceptable[4]
Residential (Single-Family, Multi-Family, Duplex)	50-60	60-65	65-75	75-85
Residential (Mobile Homes)	50-60	60-65	65-75	75-85
Office Buildings and Professional Buildings	50-65	65-75	75-80	80-85
Commercial Retail, Banks, Restaurants, Theaters	50-70	70-80	80-85	N/A
Industrial, Manufacturing, Utilities, Wholesale, Service Stations	50-70	70-85	N/A	N/A

Notes: CNEL = Community Noise Equivalent Level, dBA = A-weighted sound pressure level

[1]Normally Acceptable: Specified land uses is satisfactory based on the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

[2]Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning would normally suffice.

[3]Normally Unacceptable: New construction or development should generally be discouraged. If it does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

[4]Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Source: Rincon Consultants. (October 2018). *Noise Study for the Lady Luck, 63 Units Project (Gardena)*.

Gardena Municipal Code

GMC §§8.36.040 and 8.36.050 include exterior and interior noise standards, respectively in terms of Leq(15) and Lmax. Allowable noise levels at land uses receiving noise are summarized in **Table 4.12-3: Exterior and Interior Noise Standards**. GMC §8.36.050(C) states that if the ambient noise level exceeds the noise standard, then the ambient noise level shall become the noise standard. GMC §8.36.080(G) states that noise associated with construction, repair, remodeling, grading or demolition between the hours of 7:00 AM and 6:00 PM on weekdays and between the hours of 9:00 AM and 6:00 PM on Saturday are exempt from these noise standards. Lastly, GMC §8.36.070 prohibits the operation of a device that generates vibration above the perception threshold of an individual at or beyond the property line if the source is on private property.

TABLE 4.12-3: EXTERIOR AND INTERIOR NOISE STANDARDS				
Type of Land Use	Allowable Noise Levels			
	15-Minute Average Noise Level (Leq, dBA)		Maximum Noise Level (Lmax, dBA)	
	7AM – 10PM	10PM – 7AM	7AM – 10PM	10PM – 7AM
Allowable Exterior Noise Level				
Residential	55	50	75	70
Residential portions of mixed-use	60	50	80	70
Commercial	65	60	85	80
Industrial or manufacturing	70	70	90	90
Allowable Interior Noise Level				
Residential	45	40	65	60
Residential portions of mixed-use	45	40	70	60
Source: GMC §§8.36.040 and 8.36.050				

Impact Analysis

4.12a ***Would the Project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

4.12c ***Would the Project result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?***

4.12d ***Would the Project result in a substantial temporary or periodic increase in ambient noise level in the Project vicinity about levels existing without the Project?***

Less Than Significant With Mitigation Incorporated. The analysis of noise impacts considers the effects of the Project's short-term construction-related noise and long-term operational noise on sensitive receptors in the surrounding area.

SHORT-TERM CONSTRUCTION

Construction noise estimates are based upon noise levels reported by the FTA; Office of Planning and Environment (FTA 2006); the University of Washington School of Public Health and Community Medicine, Department of Environmental and Occupational Health Sciences *Construction Industry Noise Exposures: Operating Engineers* brochure; and the distance to nearby sensitive receptors. A distance of 25 feet is assumed for the nearest residences, as a worst-case exposure of construction equipment noise; however, most of the time, construction equipment would be used closer to the center of the Project site. Reference noise levels from these sources were then used to estimate noise levels at nearby sensitive receptors based on a standard noise attenuation rate of 6.0 dBA per doubling of distance (line-of-sight method of sound attenuation for point sources of noise). Construction noise level estimates do not account for the presence of intervening structures or topography, which could reduce noise levels at receptor locations.

Therefore, the noise levels presented herein represent a conservative, reasonable worst-case estimate of actual construction noise.

Short-term construction peak noise levels associated with the use of individual pieces of heavy equipment can range from approximately 70 to 89 dBA at 50 feet from the source, depending upon the types of equipment in operation at any given time and construction phase (FHWA 2006) (see **Appendix H** for a construction equipment list).

Noise-sensitive receptors near the Project site are depicted on **Exhibit 4.12-1** and summarized above. These receptors may experience a temporary increase in noise during construction activities on the Project site. **Table 4.12-4: Construction Noise Levels During Different Phases of Construction** shows the maximum expected noise levels at the residences nearest the Project site during different phases of construction; see **Appendix H**.

TABLE 4.12-4: CONSTRUCTION NOISE LEVELS DURING DIFFERENT PHASES OF CONSTRUCTION

Phase	Combined Maximum Hourly Noise Level (dBA, Leq)					
	25 Feet Distance	100 Feet Distance	200 feet Distance	400 Feet Distance	700 Feet Distance	800 Feet Distance
Demolition	92.5	80.4	74.4	68.4	63.5	62.4
Site Preparation	90.3	78.3	72.2	66.2	61.4	60.2
Grading	90.8	78.8	72.7	66.7	61.9	60.7
Building Construction	99.5	87.5	81.5	75.4	70.6	69.4
Paving	91.7	79.6	73.6	67.6	62.7	61.6
Architectural Coating	79.7	67.7	61.6	55.6	50.8	49.6

To summarize **Table 4.12-4**, construction activities could reach the following noise levels at nearby sensitive receptors:

- 99.5 dBA Leq at the nearest sensitive receptor, located 25 feet to the west,
- 87.5 dBA Leq at the sensitive receptor located 100 feet to the north
- 81.5 dBA Leq at the sensitive receptor located 200 feet to the east,
- 75 dBA Leq at the sensitive receptor located 400 feet to the east,
- 70.6 dBA Leq at the sensitive receptor located 700 feet to the south and southwest, and
- 69.4 dBA Leq at the sensitive receptor located 800 feet to the southeast.

However, construction noise levels at a distance of 25 feet would occur only during construction along the Project site's western boundary, while most of the construction would occur at a further distance. Ambient noise at the nearest sensitive receptor was measured at 50.4 dBA Leq (Noise Measurement 1 in **Table 4.12-1**). Construction-related noise at this and other sensitive receptor locations adjacent to the Project site would exceed ambient noise levels and could cause periodic disturbance during construction. However, modeled construction noise levels are highly conservative because they assume equipment use at the property line; typically, construction equipment would operate in the body of the Project site, farther from sensitive receptors, and individual pieces of equipment may not operate simultaneously.

As discussed above, GMC §8.36.080(G) exempts noise associated with construction, repair, remodeling, grading, or demolition between 7:00 AM and 6:00 PM on weekdays and between 9:00 AM and 6:00 PM on Saturday from noise standards. Construction activities must comply with construction hours established in the GMC. Although exempt from noise standards, measures to reduce construction noise levels are included as MM NOI-1. MM NOI-1 requires that construction equipment be equipped with mufflers and implementation of a temporary noise barrier. Following compliance with MM NOI-1, the Project's construction-related noise impacts would be less than significant.

LONG-TERM OPERATIONS

On-Site

The Project would introduce new residential land uses on the Project site. Existing residences near the Project site may be periodically subjected to noise associated with on-site vehicle traffic, use of landscaping equipment, as well as general conversations. It is assumed that there would be no stationary noise source from Project operations, except rooftop HVAC systems may be used.

Noise levels from commercial HVAC equipment can reach 90 dBA Leq at 3.0 feet (USEPA 1971) from the source. Typically, the shielding and location of HVAC units reduces noise levels to no greater than 55 dBA Leq at 50 feet from the source (USEPA 1971). Assuming noise from this point source attenuates at 6.0 dBA per doubling of distance, estimated noise levels from HVAC equipment would not exceed 61 dBA Leq at a distance of 25 feet, 49 dBA Leq at 100 feet, 43 dBA Leq at 200 feet, and 36.9 dBA Leq at 400 feet. The measured ambient noise levels serve as the applicable exterior noise standard in the Project area pursuant to GMC §8.36.040(C). As shown in **Table 4.12-1**, the measured ambient noise level in the Project site vicinity is approximately 50-70 dBA. The estimated noise level from HVAC equipment at the nearest noise-sensitive receptors along the eastern site boundary would exceed existing ambient noise levels. Therefore, MM NOI-2, which requires shielding or enclosures around the HVAC units is recommended. Following compliance with MM NOI-2, the Project's potential impacts associated with HVAC equipment would be less than significant.

In urban areas near heavy traffic, the peak hourly Leq is typically 2-4 dBA lower than the daily Ldn or CNEL. Therefore, based on the Leq levels in **Table 4.12-1**, the CNEL in the vicinity of the Project site ranges from 52 dBA to 74 dBA. However, the proposed Project includes an 8-foot high block wall adjacent to the eastern boundary to the Project site that breaks the line of site to South Vermont Avenue. The proposed wall would reduce noise levels at the condominium unit patios along the eastern boundary of the Project site by 7 dBA, resulting on-site noise levels of 67 dBA CNEL along the eastern boundary of the Project site. Proposed residences near the eastern boundary of the Project site could therefore experience noise levels that exceed the City's "conditionally acceptable" level of 65 dBA CNEL for new residential land uses and would fall within the "normally unacceptable" level of 65-75 dBA, CNEL. Impacts to sensitive receptors

at outdoor living areas are therefore considered potentially significant. MM NOI-3 provides specifications for the building materials of the proposed wall along South Vermont Avenue in order to provide sufficient noise attenuation. Following compliance with MM NOI-3, noise impacts at outdoor living areas would be less than significant.

Because modern building construction techniques typically reduce interior ambient noise by approximately 25 dBA, new residences on the Project site would not be exposed to interior noise levels in excess of the City's 45 dBA Leq(15) interior noise standard pursuant to GMC §8.36.050 (70 dBA, Leq[15] – 25 dBA = 45 dBA, Leq[15]). Additionally, state law (CCR Title 24) requires interior noise levels, attributable to exterior noise sources, to not exceed 45 dBA, CNEL in any habitable room of a new building. Following compliance with state standards, potential impacts associated with interior ambient noise would be less than significant.

Off-Site

The Project's long-term effect associated with traffic noise was analyzed by estimating ADT associated with the existing onsite surface parking and the estimated ADT to and from the proposed residences. The noise analysis estimated new vehicle trips based the *Institute of Transportation Engineers (ITE) 9th Edition Tip Generation Manual* (ITE 2012) rates for Residential Condominium/Townhouses. For this analysis, the trip generation rate of 5.81 weekday ADT per DU was used. This equates to 372 total ADT for the Project, which is a conservative estimate, since the Traffic Impact study estimated the Project would generate approximately 343 ADT; see Response 4.16a below.

For the noise analysis, daily traffic along South Vermont Avenue and Rosecrans Avenue were gathered through traffic counts provided on the City's website. Based on City traffic counts dated July 2, 2015, South Vermont Avenue at the segment closest to the Project site carries 20,400 ADT and Rosecrans Avenue at the segment closest to the Project site carries 34,200 ADT (City of Gardena 2015).

Access (ingress and egress) to the proposed Project would be provided via South Vermont Avenue. Although the Project's ADT would use nearby roadways, such as South Vermont Avenue and West Rosecrans Avenue, the expected increase of 372 ADT would increase the ADT to those roadways by approximately 2.0% and 1.0 %, respectively.[20] Per the California Department of Transportation (Caltrans) Technical Noise Supplement to the Traffic Noise Analysis Protocol, traffic volumes would need to double to result in a noticeable (3.0 dBA) noise increase (Caltrans 2013). The Project's ADT would not increase ambient noise levels by more than 3 dBA, thus, would not be audible. Therefore, the Project's mobile source noise impacts would be less than significant, and no mitigation is required.

[20] South Vermont Avenue 20,400 ADT and West Rosecrans Avenue 34,200 ADT: 372/20,400 = 0.018 * 100 = 1.8% and 372/34,200 = 0.010 * 100 = 1.0%.

Mitigation Measures

MM NOI-1 **Construction Equipment and Noise Barrier.** Prior to Grading Permit issuance, the Project applicant shall demonstrate, to the satisfaction of the City of Gardena City Engineer that the Project complies with the following:

- **Mufflers or Engine Shrouds.** Use power construction equipment with properly operating state-of- the-art noise shielding and muffling devices, consistent with manufacturers' standards.
- **Construction Scheduling.** Schedule construction activities to avoid operating several pieces of equipment simultaneously, to the extent feasible.
- **Solid Noise Attenuation Barrier.** Locate a temporary sound attenuation barrier capable of reducing noise by at least 15 dBA between the construction site and sensitive receptors to the north, east, and west of the Project site, at a height sufficient to break the line of site with construction equipment.

MM NOI-2 **Shielded or Enclosed HVAC Units.** Prior to issuance of the Certificate of Occupancy, the City of Gardena Building Services Department shall confirm that Project plans and specifications include shielding or enclosures for HVAC units.

MM NOI-3 **South Vermont Boundary Wall Building Materials.** The proposed block wall along South Vermont Avenue, adjacent to proposed outdoor patios of the condominium units along the eastern area of the Project site, shall be designed with materials sufficient to provide noise reduction of at least 10 dBA at the proposed condominium outdoor patios. Possible combinations of materials that may be used to provide a 10-dBA noise reduction include 16-gauge steel, 1-inch thick plywood, and any reasonable thickness of concrete, all of which must have a surface density of four pounds per square foot (FTA 2006).

4.12b Would the Project result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?

Less Than Significant Impact. Construction activities also have the potential to generate ground-borne vibration near sensitive receptors, especially from grading and excavation of the Project site. It is assumed pile driving would not be required for Project construction. The primary vibratory source during Project construction would likely be large bulldozers and loaded trucks. Construction vibration estimates are based upon vibration levels reported by the FTA in the Transit Noise and Vibration Impact Assessment (2006) with an assumed standard attenuation rate of 6 VdB per doubling of distance. **Table 4.12-5: Vibration Levels for Construction Equipment** identifies various vibration velocity levels for the types of construction equipment that would operate at the Project site during construction activities, including bulldozers, loaded trucks, and vibratory rollers. Nearby sensitive receptors, including the residences located 25 feet to the west of the Project site, the single-family residences located approximately 100 feet to the north, the motel located approximately 200 feet to the east, and the single-family residences

located approximately 400 feet to the east, could be exposed to ground-borne vibrations during construction. As shown in **Table 4.12-5**, vibration levels could reach up to 94 VdB at receptors 25 feet away; up to 76 VdB at receptors 100 feet away; up to 67 VdB at receptors 200 feet away; and up to 58 VdB at receptors 400 feet away. Vibration levels would not reach a perceptible level at the sensitive receptors 700 and 800 feet distance from the Project site. However, construction vibration levels at 25 feet from the source would occur only during construction along the Project site's western boundary, while most of the construction would occur at a further distance.

TABLE 4.12-5: VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Approximate Vibration Decibels (VdB) at Distance (Feet) from Construction			
	25 Feet	100 Feet	200 Feet	400 Feet
Large Bulldozer	87	69	60	51
Loaded Trucks	86	68	58	49
Vibratory Roller	94	76	67	58
Small Bulldozer	58	39	30	21

Source: Source: Federal Transit Administration. (2006). *Transit Noise and Vibration Impact Assessment*.

Although Project construction would generate vibration reaching an estimated 94 VdB at adjacent sensitive receptors, construction would not occur between the hours of 6:00 PM and 7:00 AM during weekdays nor between the hours of 6:00 PM and 9:00 AM on Saturday, nor Sunday or any federal holiday. These restrictions on the timing of construction would prevent vibration during normal sleeping hours. Therefore, vibration levels at nearby sensitive receptors would not exceed the FTA's guideline of 75 VdB for distinctly perceptible vibration during hours when people normally sleep. Additionally, vibration levels would not exceed 100 VdB, which is the vibration level which would damage extremely fragile historic buildings. Therefore, vibration impacts would be less than significant, and no mitigation is required.

4.12e ***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 expose people residing or working in the Project area to excessive noise levels?***

4.12f ***For a project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?***

No Impact. The closest airport to the Project site is Hawthorne Municipal Airport, located 2.43 miles to the northwest. The Project is not within 2.0 miles of a public airport or within an airport land use plan. 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 airport- or airstrip-related noise levels and no mitigation is required.

4.13 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 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 housing, necessitating the construction of replacement housing elsewhere?				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?			X	

Impact Analysis

4.13a ***Would the Project induce substantial 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 City's current population as of January 1, 2018 is approximately 61,246 persons.[21] The City's housing stock totaled 21,873 DU with approximately 2.88 persons per household (PPH).

No employment generating land uses or extension of roads capable of inducing direct/indirect population growth in the City are proposed. However, the Project proposes development of a residential community consisting of 63 attached townhomes. Assuming 63 DU and 2.88 PPH, the Project's forecast population growth is approximately 181 persons. Therefore, the Project would induce direct population growth in the City by proposing new homes. The Project's forecast population growth would increase the City's existing population of approximately 61,246 persons by less than one-half percent (approximately 0.30%). Additionally, It is the City's goal (GGP Land Use Goal 1) to "preserve and protect existing single-family and low/medium-density residential neighborhoods while promoting the development of additional high-quality housing types in the City." The proposed Project would be in furtherance of this goal by providing additional housing types in the City. The Project's nominal population growth is not considered substantial in a City-

[21] California Department of Finance. (2018). E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2018 with 2010 Census Benchmark.

wide context. Therefore, the Project would result in a less than significant concerning population growth and no mitigation is required.

4.13b Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. There are no housing units on the Project site; therefore, the Project would not displace existing housing or require construction of replacement housing elsewhere. No impact would occur in this regard and no mitigation is required.

4.13c Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact. Onsite improvements include a surface parking lot associated with a vehicle repossession/auction company, and a wood shop/storage building, and office/storage building associated with the adjacent casino. The Project proposes to remove all existing onsite structures, thus, displacing existing uses. However, their removal would not displace substantial numbers of people or require construction of replacement housing elsewhere, given the nature and scope of the displaced employment-generating land uses. Therefore, Project impacts would be less than significant, and no mitigation is required.

4.14 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

4.14a Fire Protection?

Less Than Significant Impact. The City contracts the Los Angeles County Fire Department (LACFD) to provide fire protection and emergency medical services for the City. LACFD operates two fire stations within the City: Fire Station 158, located at 1650 West 162nd Street, and Fire Station 159, located at 2030 West 135th Street. The closest fire station to the Project site is Station #159, approximately 1.3 miles to the northwest. The population growth associated with the Project would incrementally increase the demand for fire protection and emergency medical services to the Project site. However, the LACFD Fire Prevention Division has reviewed the Project and specified access and water system requirements, which would enhance the proposed development's fire protection, which would be required as COA. Therefore, Project impacts concerning fire protection services would be less than significant and no mitigation is required. Additionally, the Project does not propose, and would not create a need for, new/physically altered fire protection facilities, thus, no environmental impact would occur in this regard.

4.14b Police Protection?

Less Than Significant Impact. Police protection services would be provided by the City of Gardena Police Department (GPD). The GPD has 83 police officers and 19 part-time employees. The closest police station is located at 1718 West 162nd Street, approximately 1.6 miles southwest of the Project site.

The population growth associated with the Project would incrementally increase the demand for police protection services to the Project site. However, through the City's Site Plan review process, the GPD will review the Project concerning access and other safety measures, which would enhance the proposed development's police protection. Therefore, Project impacts concerning police protection would be less than significant and no mitigation is required. Additionally, the Project does not propose, and would not create a need for, new/physically altered police protection facilities, thus, no environmental impact would occur in this regard.

4.14c Schools?

Less Than Significant Impact. The Project site is within Los Angeles Unified School District (LAUSD) boundaries. The public schools listed below would serve the proposed Project.[22]

- 135th Street Elementary School (ES) (K-5),
- Purche Avenue ES (K-5),
- Avalon Gardens ES (K-6),
- 135th Street ES (K Only),
- Peary Middle School (6-8),
- Animo Western Charter Middle School (CMS) (6-8),
- Animo Wheatley CMS (6-8), and
- Gardena High School (9-12).

Various private schools serving K – 12 also exist in the Project area.

Based on LAUSD's student generation factor of 0.437 students per new DU, the proposed Project is forecast to generate approximately 28 new students to the LAUSD.[23] The student population growth associated with the Project would incrementally increase the demand for school facilities/services. However, the Project would be subject to payment of school impact fees in accordance with Senate Bill 50 (SB50). Pursuant to Government Code §65995(3)(h), "payment of statutory fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property…" Therefore, Project impacts to schools would be less than significant and no mitigation is required. Additionally, the Project does not propose, and would not create a need for, new/physically altered school facilities, thus, no environmental impact would occur in this regard.

4.14d Parks?

Less Than Significant Impact. See Response 4.15 below.

[22] Los Angeles Unified School District. (2018). Retrieved from https://www.arcgis.com/home/webmap/viewer.html?webmap=e32c5cd92bf74e19acafb26752b63f0a.

[23] Los Angeles Unified School District. (2018). Developer Fee Justification Study, Table 3: LA Unified Student Generation Factors. Roseville, CA: Schoolworks, Inc.

4.14e Other public facilities?

Less Than Significant Impact. Los Angeles County Library operates 84 community-based library outlets, including four bookmobiles in 51 of 88 cities and unincorporated areas.[24, 25] Los Angeles County Library is responsible for maintenance and library improvements to meet future library service's needs. The population growth associated with the Project would incrementally increase the demand for library services, and specifically at the Gardena Mayme Dear Library located at 1731 West Gardena Boulevard, Gardena. The Library system has developed a Strategic Plan that identifies goals and objectives including financial management and fundraising strategies to maintain and enhance library facilities to meet future demands. Given the Project's nature and scope, impacts to library facilities/services would be less than significant and no mitigation is required. Additionally, the Project does not propose, and would not create a need for, new/physically altered library protection facilities, thus, no environmental impact would occur in this regard.

[24] LA County Library. (2018). Our Strategic Initiatives. Retrieved from Library https://lacountylibrary.org/aboutus-strategic/.
[25] LA County Library. (2018). Public Libraries. https://www.lacounty.gov/things-to-do/libraries-museums/public-libraries/.

4.15 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) 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

4.15a ***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?***

4.15b ***Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

Less Than Significant Impact. As specified in GMC Chapter 17.20, the City requires either the dedication of land, the payment of fees, or a combination of both for park or recreational purposes, as a TTM COA. GMC §17.20.030 specifies that a minimum of 3.0 acres of usable park area is required per 1,000 persons residing within the subdivision. The Project's forecast population growth is approximately 181 persons; see Response 4.13a. Based on this forecast population growth and the City's park area target of 3.0 acres per 1,000 persons, the Project would create a demand for approximately 0.54 acres of usable park area. Additionally, the population growth associated with the Project could also incrementally increase the use of existing recreational facilities, potentially accelerating their deterioration. Following compliance with GMC §17.20.030, the proposed Project would result in a less than significant impact to recreational facilities and no mitigation is required. Additionally, the Project does not propose, and would not create a need for, new/physically altered recreational facilities, thus, no environmental impact would occur in this regard.

4.16 Transportation and Traffic

This Section is based on the *Traffic Impact Study for the Stonefield 63 Project* (Kimley-Horn, October 2018), which is included in its entirety in **Appendix I: Traffic Impact Study**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			X	
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			X	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?				X
e) Result in inadequate emergency access?			X	
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			X	

PERFORMANCE CRITERIA AND SIGNIFICANCE THRESHOLDS

Performance Criteria. The City of Gardena's LOS standard for intersections in a residential area is LOS D, while the standard for intersections in a commercial area is LOS E. The three study intersections are located within a commercial area, therefore, the LOS standard for the study intersections is LOS E.

INTERSECTION PEAK HOUR LEVEL OF SERVICE DESCRIPTIONS			
LOS	**Signalized: ICU**	**Unsignalized: HCM**	**Description**
	V/C Ratio	**Delay (sec)**	
A	0.000 - 0.604	≤10.0	EXCELLENT – No vehicle waits longer than one red light, and no approach phase is fully used.
B	0.605 - 0.704	> 10.0 and ≤ 15.0	VERY GOOD – An occasional approach phase is fully utilized; drivers begin to feel somewhat restricted within groups of vehicles.
C	0.705 - 0.804	> 15.0 and ≤ 25.0	GOOD – Occasionally drivers may have to wait through more than one red light; back-ups may develop behind turning vehicles.
D	0.805 - 0.904	> 25.0 and ≤ 35.0	FAIR – Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive back-ups.
E	0.905 - 1.004	> 35.0 and ≤ 50.0	POOR – Represents the most vehicles that intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 1.004	> 50.0	FAILURE – Back-ups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of intersection approaches. Substantial delays with continuously increasing queue

Significance Thresholds. Based on City of Gardena standards, a project impact would be considered significant if:

- It causes an intersection operating at an acceptable LOS to deteriorate to an unacceptable LOS; or
- an intersection is already operating at an unacceptable LOS, it adds 0.01 or more to the peak hour ICU.

Based on the City of Los Angeles standards, an impact at a signalized intersection would be deemed significant in accordance with the following impact thresholds:

Level of Service	Final V/C Ratio	Project-Related Increase in V/C
C	> 0.701 – 0.800	equal to or greater than 0.040
D	> 0.801 – 0.900	equal to or greater than 0.020
E	> 0.901 – 1.000	equal to or greater than 0.010
F	Greater than 1.000	equal to or greater than 0.010

APPROACH

The traffic analysis provides an evaluation of AM and PM peak hour operations for the following scenarios:

- Existing Conditions
- Existing Plus Project Conditions
- Opening Year 2021 (Cumulative Conditions) without Project
- Opening Year 2021 (Cumulative Conditions) with Project
- Buildout without Project
- Buildout with Project

The following study intersections are included in the analysis:

- 141st Street at Vermont Avenue
- Rosecrans Avenue at Budlong Avenue
- Rosecrans Avenue at Vermont Avenue

The analysis focuses on the Project's off-site traffic-related impacts. In accordance with the City of Gardena study requirements, intersection operation for study area signalized intersections is evaluated using the Intersection Capacity Utilization (ICU) methodology, and intersection operation for study area unsignalized intersections is evaluated using the Highway Capacity Manual (HCM) methodology.

The ICU methodology provides a comparison of the theoretical hourly vehicular capacity of an intersection to the number of vehicles passing through that intersection during the peak hour. The ICU calculation returns a volume-to-capacity (V/C) ratio. The ICU calculations assume a per-lane capacity of 1,600 vehicles per hour (vph), with a clearance interval of 0.10. The HCM methodology returns a delay value, expressed in terms of the average seconds of delay per vehicle.

For signalized intersections in the City of Los Angeles, the Critical Movement Analysis (CMA) planning method is used to evaluate the impacts of development projects. The CMA methodology determines the V/C ratio for signalized intersections on a critical lane basis. The Rosecrans Avenue at Vermont Avenue intersection is located on the border of the City of Gardena and the City of Los Angeles. Due to its proximity to the City of Los Angeles, the Rosecrans Avenue at Vermont Avenue intersection has also been analyzed using the City of Los Angeles' CMA methodology.

Operating conditions for both the ICU/CMA capacity-based methodologies and the HCM delay-based methodology are expressed in terms of Level of Service (LOS). The ICU and CMA calculations return a V/C ratio that translates into a corresponding LOS, ranging from LOS A, representing uncongested, free-flowing conditions; to LOS F, representing congested, over-capacity conditions. The HCM methodology returns a delay value, expressed in terms of the average seconds of delay per vehicle, which also corresponds to a LOS measure.

EXISTING TRAFFIC CONDITIONS

Existing Street System

Regional access to the Project site is provided by: the Interstate 110 (I-110) Freeway, located approximately 0.25 mile east of the Project site, the Interstate 105 (I-105) Freeway, located approximately 2.0 miles north of the Project site, and the Interstate 405 (I-405) Freeway, located approximately 3.0 miles south of the Project site.

Local access to the Project site is provided by the following arterial and commuter roadways:

Vermont Avenue is a north-south Arterial with three lanes in each direction, divided by a 65-foot median, with pockets of public parking within the median area. There is a Class II Bicycle Lane (on-street striped bicycle lane) in the northbound direction within the Project vicinity. Vermont Avenue is located along the City of Gardena's eastern boundary. On-street parking is allowed, and the posted speed limit is 40 miles per hour. Vermont Avenue is designated as a truck route on the GGP Circulation Element.

Rosecrans Avenue is an east-west Arterial with three lanes in each direction and a center two-way-left-turn lane within 80 feet of right-of-way (ROW). On-street parking is prohibited, and the posted speed limit is 40 miles per hour. Rosecrans Avenue is a designated truck route on the GGP.

141st Street is a two-lane undivided east-west Local Street with one lane in each direction within 54 feet of ROW. 141st Street extends westward from Vermont Avenue, ending in a cul-de-sac near the southeast corner of the Project site. The Project would take access to and from the 141st Street east cul-de-sac. 141st Street also extends eastward from Budlong Avenue, through a single-family neighborhood, ending in a cul-de-sac at the southwest corner of the Project site. The Project would not take access via the 141st Street west cul-de-sac.

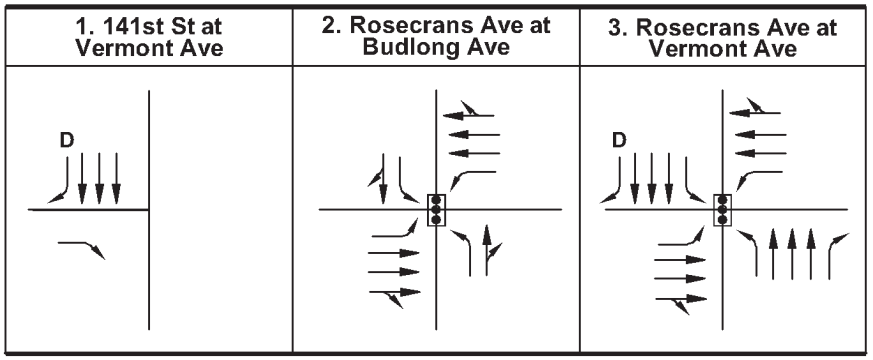
Existing Peak Hour Traffic Volumes

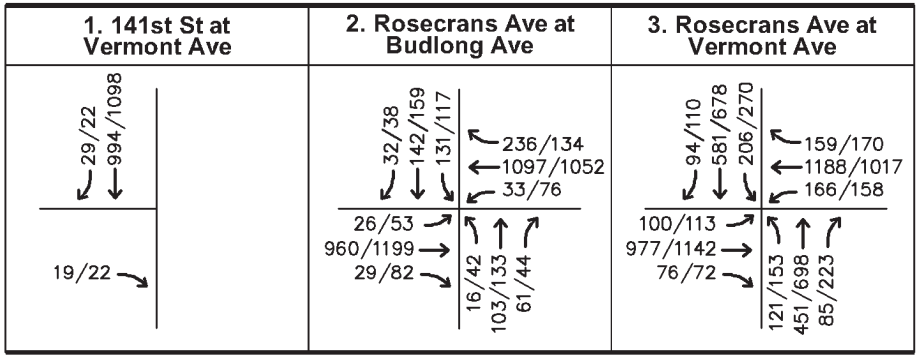
Existing peak hour turning movement traffic count data was collected at the study intersections in April and September 2018. Existing lane configurations and traffic control and existing morning and evening peak hour turning movement volumes for the study intersections are shown in **Exhibit 4.16-1: Existing Lane Configuration, Traffic Control, and Peak Hour Traffic Volumes**.

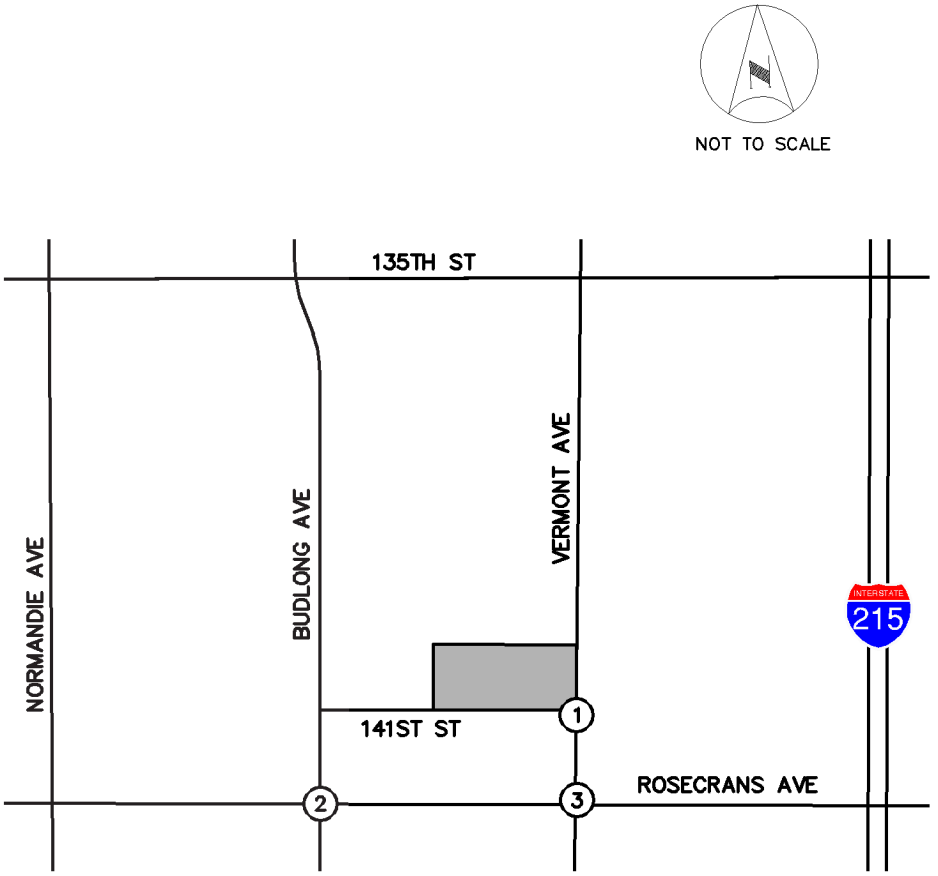
The Project site is currently developed as an asphalt surface parking lot, used for vehicle storage, and two buildings used for wood shop and office storage. The peak hour traffic counts at the 141st Street at Vermont Avenue intersection indicate that on the day the traffic counts were conducted, the existing site uses generated 48 AM peak hour trips (29 inbound and 19 outbound), and 44 PM peak hour trips (22 inbound and 22 outbound).

Existing Peak Hour Traffic Conditions

Existing peak hour operations at the study intersections were evaluated, and the results of the analysis are summarized on **Table 4.16-1: Summary of Intersection Operation Existing Conditions**. Review of this table shows that all study intersections are currently operating at LOS C or better in both peak hours.







Source: Traffic Impact Study for the Stonefield 63 Project, Kimley-Horn and Associates, Inc. October, 2018.

Exhibit 4.16-1
Existing Lane Configuration, Traffic Control & Peak Hour Traffic Volumes

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TABLE 4.16-1: SUMARY OF INTERSECTION OPERATION EXISTING CONDITIONS						
Int. #	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			V/C Delay	LOS	V/C Delay	LOS
1	141st Street at Vermont Ave	U	10.2	B	10.4	B
2	Rosecrans Ave at Budlong Ave	S	0.578	A	0.598	A
3	Rosecrans Ave at Vermont Ave (ICU)	S	0.666	B	0.766	C
	Rosecrans Ave at Vermont Ave (CMA)	S	0.658	B	0.775	C

S = Signalized intersection; U = Unsignalized intersection
ICU = Intersection Capacity Utilization; CMA = Critical Movement Analysis; LOS = Level of Service
ICU and CMA values are expressed as volume-to-capacity (v/c) ratio.
Delay is expressed in average seconds of delay per peak hour vehicle.
LOS shown in **Bold** indicates unacceptable Level of Service.

Impact Analysis

4.16a ***Would the Project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?***

Less Than Significant Impact. The following summarizes the findings of the Traffic Impact Study for each traffic scenario.

PROPOSED PROJECT TRIP GENERATION

The proposed Project would remove the existing onsite uses. Average daily and peak hour trip estimates for the proposed Project were developed, based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition rates for mid-rise, multi-family housing (ITE Land Use 221). The trip rates and resulting Project trip generation estimates are shown on **Table 4.16-2: Summary of Project Trip Generation**. The Project is estimated to generate approximately 23 trips in the AM peak hour and 28 trips in the PM peak hour, with 343 ADT.

For a conservative analysis, the Project traffic analysis is based on the full trip-making potential for the Project, without applying a trip credit for the existing site trips.

TABLE 4.16-2: SUMMARY OF PROJECT TRIP GENERATION									
Land Use	**ITE Code**	**Unit**	**Trip Generation Rates [1]**						
			Daily	**AM Peak Hour**			**PM Peak Hour**		
				In	**Out**	**Total**	**In**	**Out**	**Total**
Multifamily Housing (Mid-Rise)	221	DU	5.440	0.094	0.266	0.36	0.268	0.172	0.44
Land Use	**Quantity**	**Unit**	**Trip Generation Estimates**						
			Daily	**AM Peak Hour**			**PM Peak Hour**		
				In	**Out**	**Total**	**In**	**Out**	**Total**
Multifamily Housing (Mid-Rise)	63	DU	343	6	17	23	17	11	28
Total Project Trips			**343**	**6**	**17**	**23**	**17**	**11**	**28**
[1] Source: Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition									

PROJECT TRIP DISTRIBUTION AND ASSIGNMENT

Project trip distribution assumptions were developed based on the surrounding street system serving the site, the location and configuration of the site access, and the area's existing traffic patterns. All Project trips would enter and exit the site via the 141st Street at Vermont Avenue intersection, which is restricted to right-in/right-out only movements, due to the raised median on Vermont Avenue. Trip distribution and assignment assumptions are shown on **Exhibit 4.16-2: Project Trip Distribution**. Based on these assumptions, the Project-related peak hour trips are shown on **Exhibit 4.16-3: Project-Related Peak Hour Traffic**.

EXISTING PLUS PROJECT CONDITIONS

The Existing Plus Project analysis addresses the impacts associated with adding Project-related trips to Existing Conditions traffic volumes. The Existing Plus Project scenario is a hypothetical scenario, which assumes that the Project would be fully implemented at the present time, with no other changes to area traffic volumes or to the street network serving the site. This analysis is required by CEQA and assumes full development of the Project and full absorption of Project traffic on the circulation system at the present time.

Existing Plus Project Peak Hour Analysis

Project-related trips were added to existing traffic volumes to forecast Existing Plus Project Conditions. Morning and evening peak hour traffic volumes for this scenario are shown on **Exhibit 4.16-4: Existing Plus Project Peak Hour Traffic Volumes**. A summary of the resulting intersection LOS is provided on **Table 4.16-3: Summary of Intersection Operation Existing Plus Project Conditions**. Review of this table shows that all study intersections would continue to operate at LOS C or better under Existing Plus Project Conditions.

NOT TO SCALE

LEGEND:

- = Project Site
- XX% = Percent Trip Distribution
- (X) = Study Intersection

Source: Traffic Impact Study for the Stonefield 63 Project, Kimley-Horn and Associates, Inc. October, 2018.

Exhibit 4.16-2
Project Trip Distribution

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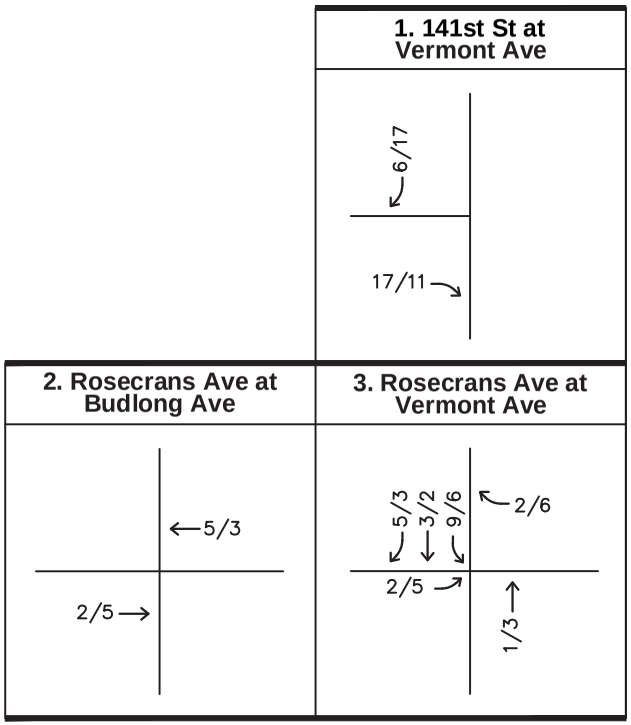

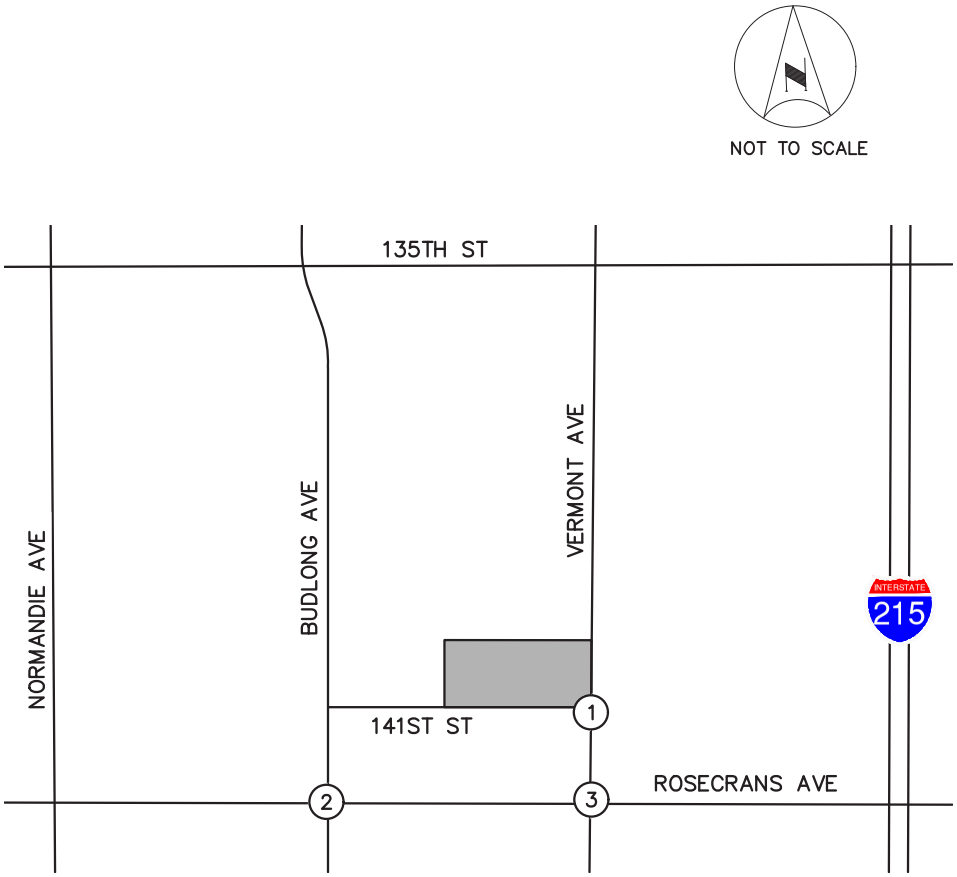

LEGEND:

- = Project Site
- (X) = Study Intersection
- XX/YY = AM / PM Peak Hour Turning Movement Volumes

Source: Traffic Impact Study for the Stonefield 63 Project, Kimley-Horn and Associates, Inc. October, 2018.

Exhibit 4.16-3
Project-Related Peak Hour Traffic

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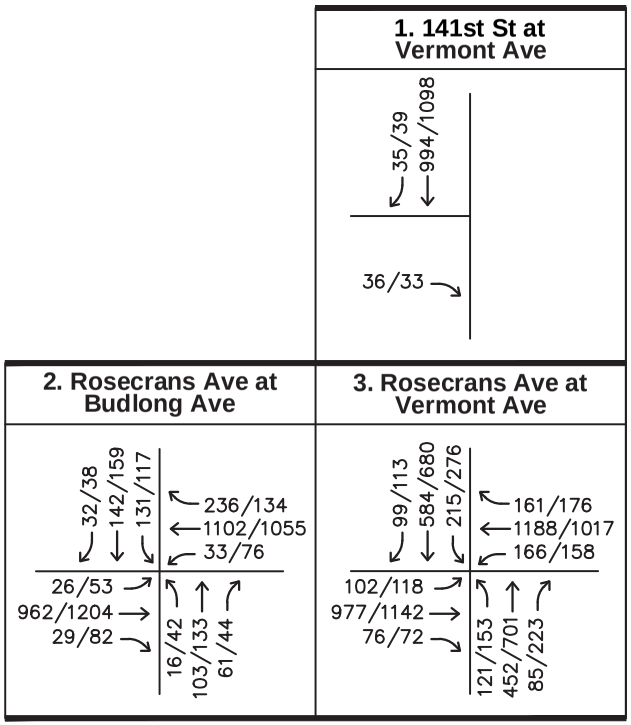

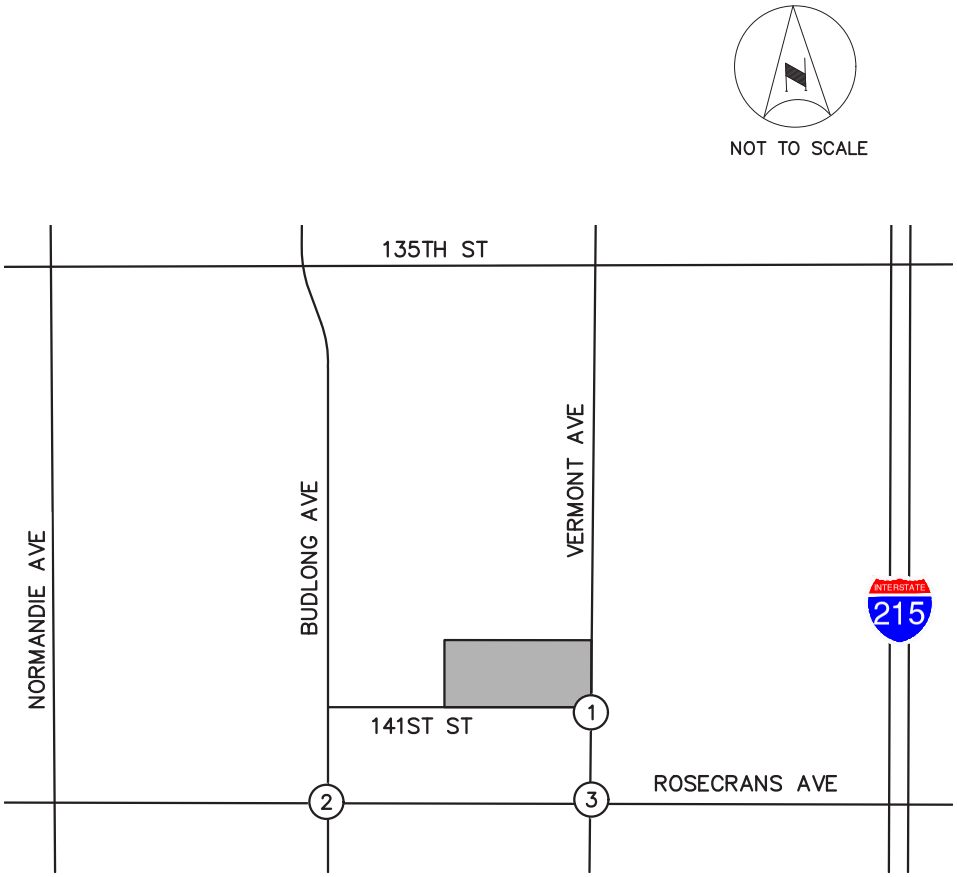

LEGEND:

- = Project Site
- (X) = Study Intersection
- XX/YY = AM / PM Peak Hour Turning Movement Volumes

Source: Traffic Impact Study for the Stonefield 63 Project, Kimley-Horn and Associates, Inc. October, 2018.

Exhibit 4.16-4
Existing Plus Project Peak Hour Traffic Volumes

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TABLE 4.16-3: SUMMARY OF INTERSECTION OPERATION EXISTING PLUS PROJECT CONDITIONS

Int. #	Intersection	Traffic Control	AM Peak Hour						PM Peak Hour					
			Without Project		With Project		Project Impact	Impact Sig?	Without Project		With Project		Project Impact	Impact Sig?
			V/C /Delay	LOS	V/C /Delay	LOS			V/C /Delay	LOS	V/C /Delay	LOS		
1	141st Street at Vermont Ave	U	10.2	B	10.3	B	0.1	No	10.4	B	10.5	B	0.1	No
2	Rosecrans Ave at Budlong Ave	S	0.578	A	0.579	A	0.001	No	0.598	A	0.599	A	0.001	No
3	Rosecrans Ave at Vermont Ave (ICU)	S	0.666	B	0.673	B	0.007	No	0.766	C	0.770	C	0.004	No
	Rosecrans Ave at Vermont Ave (CMA)	S	0.658	B	0.668	B	0.010	No	0.775	C	0.780	C	0.005	No

S = Signalized intersection; U = Unsignalized intersection
ICU = Intersection Capacity Utilization; CMA = Critical Movement Analysis; LOS = Level of Service
ICU and CMA values are expressed as volume-to-capacity (v/c) ratio.
Delay is expressed in average seconds of delay per peak hour vehicle.
LOS shown in **Bold** indicates unacceptable Level of Service.

FUTURE CONDITIONS

Project completion is estimated to occur in Year 2021. Near-term future (Opening Year 2021) traffic forecasts have been developed to evaluate Cumulative Conditions for the anticipated Project opening year. Opening Year 2021 traffic forecast volumes were developed using the approach described below.

Opening Year 2021

Background Growth

Future year forecasts for Opening Year 2021 were developed using the "build-up" process, starting with adding a background growth factor to existing peak hour volumes. Based on the Los Angeles County Congestion Management Program (CMP) for the South Bay/LAX area, the annual growth rate between the years 2018 and 2021 is 0.233%.

Cumulative Projects

In addition to ambient growth, cumulative project traffic volumes are added to existing traffic volumes. Cumulative projects consist of projects in the vicinity that have been approved but are not yet built and fully occupied, as well as projects that are in various stages of the application and approval process but have not yet been approved. These projects are considered "reasonably foreseeable," and must therefore be included in the Cumulative Projects analysis. Cumulative project information was obtained from the City of Gardena Planning Department and the City of Los Angeles Department of Public Works and Department of City Planning.

A summary of the cumulative projects included in the Cumulative Conditions analysis is provided in **Table 4.16-4: Summary of Cumulative Projects**. The location of the cumulative projects in relation to the Project site is shown on **Exhibit 4.16-5: Location of Cumulative Projects**.

TABLE 4.16-4: SUMMARY OF CUMULATIVE PROJECTS

Proj. No.	Project Address	Land Use	Quantity	Unit	Project Trips				
					Daily Trips	AM Peak Hour		PM Peak Hour	
						In	Out	In	Out
City of Gardena									
1	1333 W. 168th Street	Multi-Family Residential	4	DU	29	0	1	1	1
2	1348 W. 168th Street	Multi-Family Residential	10	DU	73	1	4	4	2
3	1112 Gardena Blvd.	Multi-Family Residential	12	DU	88	1	4	4	2
4	1417 W. 141st St.	Multi-Family Residential	63	DU	461	7	22	22	13
5	13919 Normandie Ave.	Multi-Family Residential	20	DU	146	2	7	7	4
6	1715 W. 149th St.	Multi-Family Residential	5	DU	37	1	2	2	1
7	1341 W. Gardena Blvd.	Multi-Family Residential	14	DU	102	1	5	5	3
8	16819 Normandie Ave.	Multi-Family Residential	63	DU	461	7	22	22	13
9	15930 S. Western Avenue	Medical Office	6.430	KSF	224	14	4	6	16
10	14105 S. Vermont Ave.	Fast-food Restaurant	1.500	KSF	706	31	30	25	24
11	1201 W. 155th Ave.	Medical Office	11.550	KSF	402	25	7	11	29
12	15106 S. Western Ave.	Commercial	6.573	KSF	248	4	2	12	13
13	1420 Redondo Beach Blvd.	Restaurant	4.053	KSF	455	22	18	25	15
14	16210 Crenshaw Blvd	Fast-food Restaurant	4.860	KSF	545	27	22	29	18
15	14504 S. Normandie Ave.	Multi-Family Residential	96	DU	703	10	34	34	20
16	15350 Van Ness Ave.	Multi-Family Residential	42	DU	307	4	15	15	9
17	16809 S. Normandie Ave.	Multi-Family Residential	21	DU	154	2	7	7	4
18	1147 W. Gardena Blvd.	Multi-Family Residential	4	DU	29	0	1	1	1
19	16958 S. Western Ave.	Multi-Family Residential	46	DU	337	5	16	16	10
20	15927 S. Brighton Ave.	Multi-Family Residential	2	DU	15	0	1	1	0
21	14321 Van Ness Ave.	Multi-Family Residential	40	DU	293	4	14	14	8
22	2315 Marine Avenue	Multi-Family Residential	66	DU	483	7	23	23	14
23	1515 W. 178th St.	Multi-Family Residential	63	DU	461	7	22	22	13
City of Gardena Total					**6,759**	**182**	**283**	**308**	**233**

TABLE 4.16-4: SUMMARY OF CUMULATIVE PROJECTS									
Proj. No.	Project Address	Land Use	Quantity	Unit	Project Trips				
					Daily Trips	AM Peak Hour		PM Peak Hour	
						In	Out	In	Out
City of Los Angeles									
24	15134 S. Vermont Avenue	Warehousing	322.32	KSF	1,503	100	25	34	100
City of Los Angeles Total					**1,503**	**100**	**25**	**34**	**100**
Total					**8,262**	**282**	**308**	**342**	**333**
KSF = Thousand Square Feet, DU = Dwelling Units									

Opening Year 2021 Without Project Conditions

The ambient growth and the project-related traffic volumes from the cumulative projects were added to the existing peak hour volumes to develop Opening Year 2021 Without Project peak hour forecasts. The resulting peak hour volumes are shown on **Exhibit 4.16-6: Opening Year 2021 Without Project Peak Hour Traffic Volumes**. The results of the Opening Year 2021 Without Project intersection analysis are summarized on **Table 4.16-5: Summary of Intersection Operation Opening Year 2021 Without Project**. Review of this table shows that, with the addition of ambient growth and the traffic from cumulative projects, the study intersections would continue to operate at LOS C or better in both peak hours.

TABLE 4.16-5: SUMMARY OF INTERSECTION OPERATION OPENING YEAR 2021 WITHOUT PROJECT						
Int. #	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			V/C /Delay	LOS	V/C/Delay	LOS
1	141st Street at Vermont Ave	U	10.4	B	10.7	B
2	Rosecrans Ave at Budlong Ave	S	0.586	A	0.607	B
3	Rosecrans Ave at Vermont Ave (ICU)	S	0.691	B	0.787	C
	Rosecrans Ave at Vermont Ave (CMA)	S	0.688	B	0.800	C
S = Signalized intersection; U = Unsignalized intersection ICU = Intersection Capacity Utilization; CMA = Critical Movement Analysis; LOS = Level of Service ICU and CMA values are expressed as volume-to-capacity (v/c) ratio. Delay is expressed in average seconds of delay per peak hour vehicle. LOS shown in **Bold** indicates unacceptable Level of Service.						

Opening Year 2021 with Project Conditions

Project-related peak hour traffic volumes for the proposed Project were added to the Opening Year 2021 without Project traffic volumes to develop Opening Year 2021 with Project traffic forecast volumes. The resulting peak hour traffic volumes are shown on **Exhibit 4.16-7: Opening Year 2021 With Project Peak Hour Traffic Volumes**.

The intersection analysis was run with the addition of Project trips, and the results are summarized on **Table 4.16-6: Summary of Intersection Operation Opening Year 2021 With Project**. Review of this table shows that all study intersections would continue to operate at LOS C or better with the addition of Project traffic.

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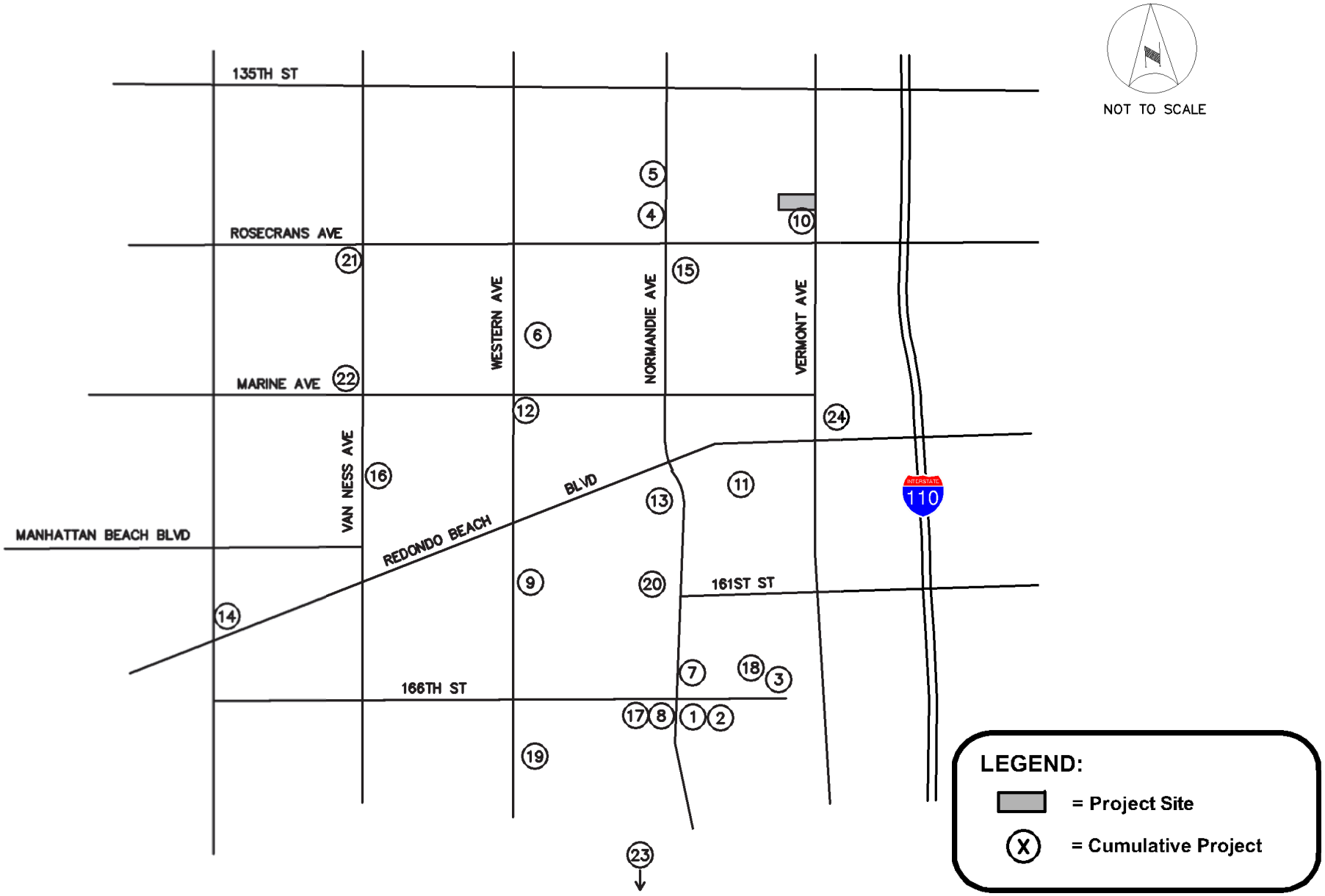

Source: Traffic Impact Study for the Stonefield 63 Project, Kimley-Horn and Associates, Inc. October, 2018.

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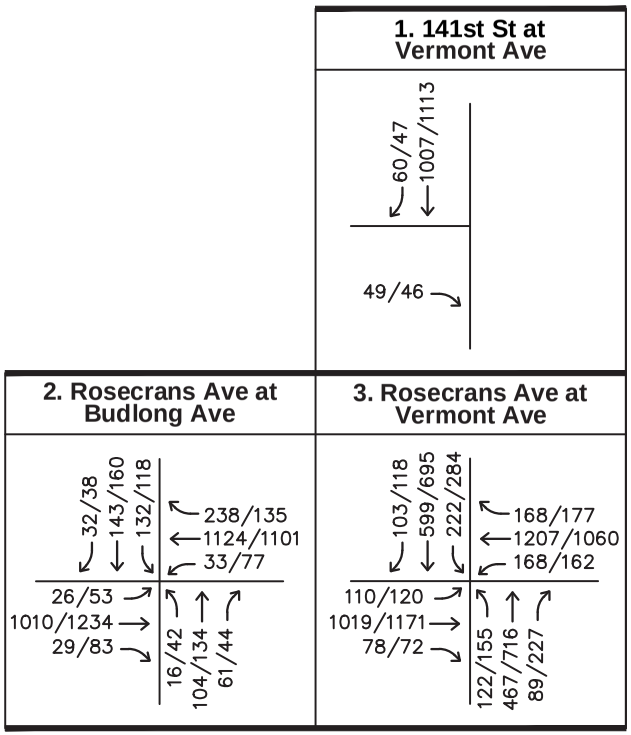

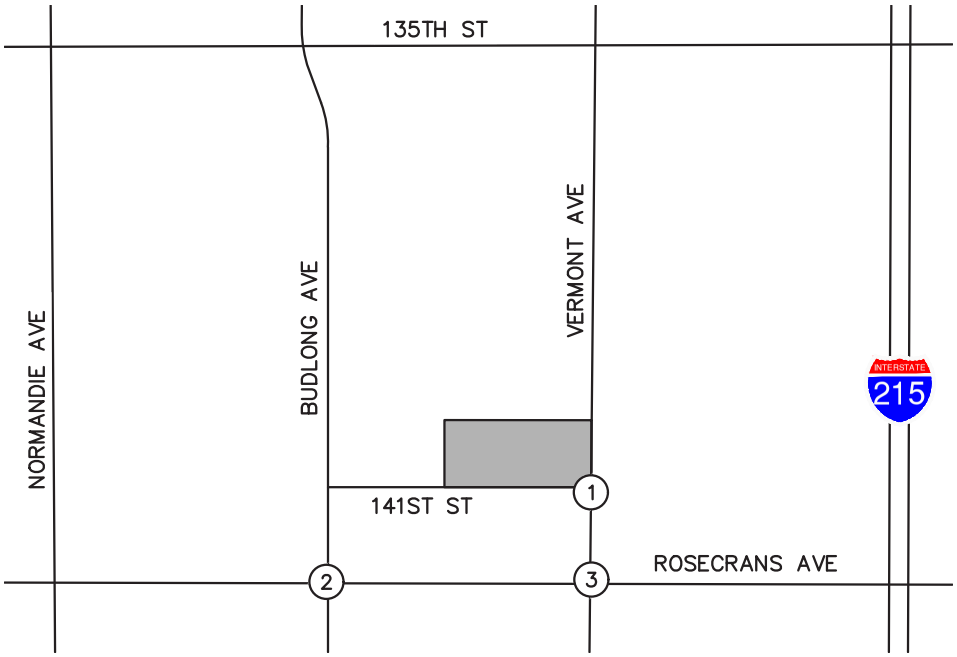

LEGEND:

- = Project Site
- (X) = Study Intersection
- XX/YY = AM / PM Peak Hour Turning Movement Volumes

Source: Traffic Impact Study for the Stonefield 63 Project, Kimley-Horn and Associates, Inc. October, 2018.

Exhibit 4.16-6
Opening Year 2021 Without Project Peak Hour Traffic Volumes

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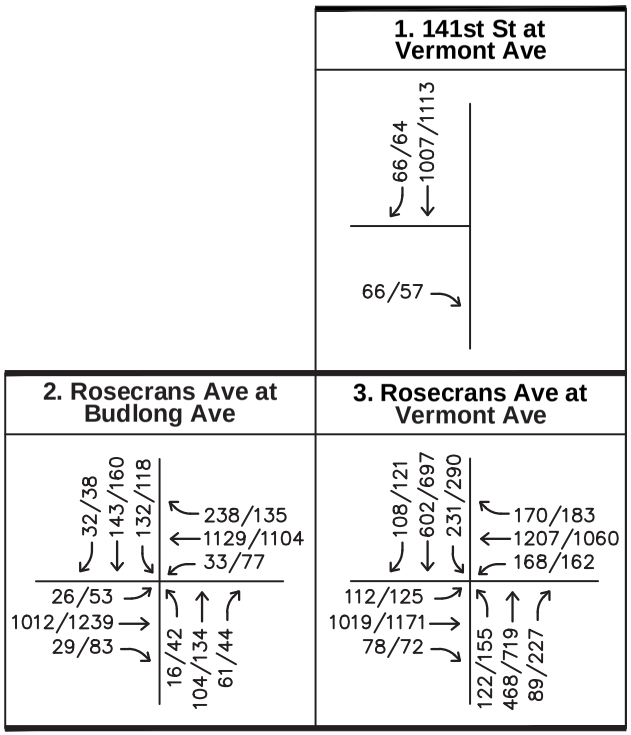

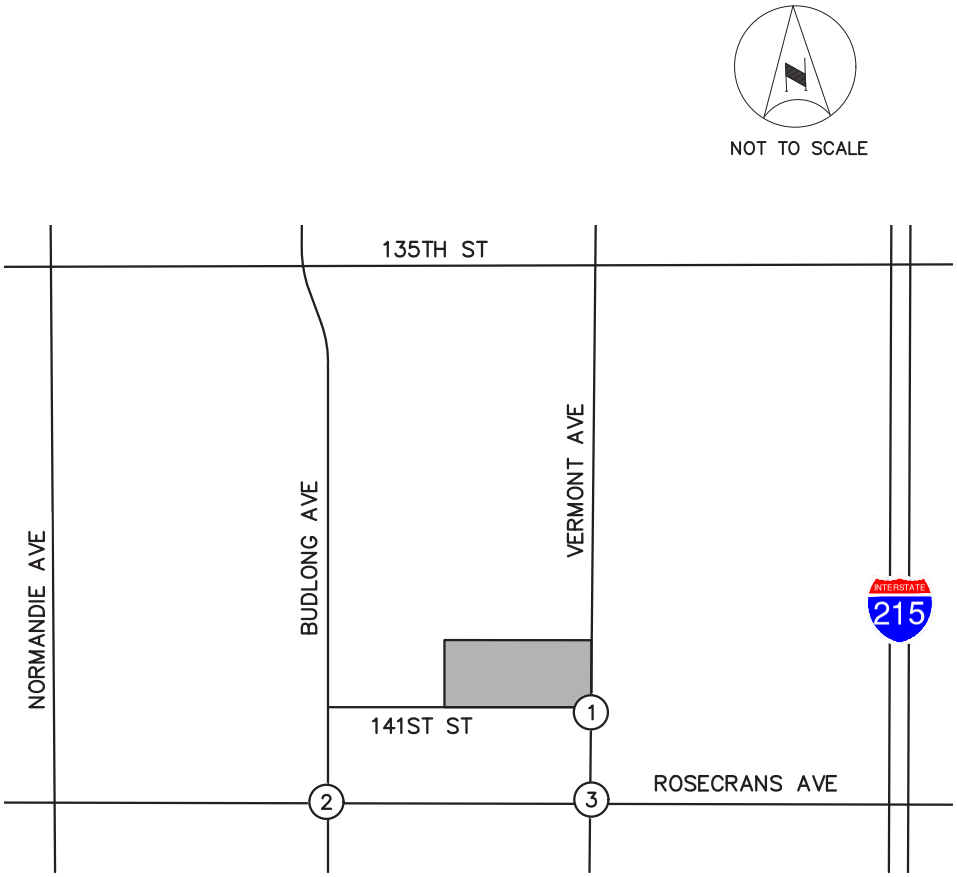

LEGEND:

- = Project Site
- (X) = Study Intersection
- XX/YY = AM / PM Peak Hour Turning Movement Volumes

Source: Traffic Impact Study for the Stonefield 63 Project, Kimley-Horn and Associates, Inc. October, 2018.

Exhibit 4.16-7
Opening Year 2021 With Project Peak Hour Traffic Volumes

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TABLE 4.16-6: SUMMARY OF INTERSECTION OPERATION OPENING YEAR 2021 WITH PROJECT														
Int. #	Intersection	Traffic Control	AM Peak Hour						PM Peak Hour					
			Without Project		With Project		Project Impact	Impact Sig?	Without Project		With Project		Project Impact	Impact Sig?
			V/C /Delay	LOS	V/C /Delay	LOS			V/C /Delay	LOS	V/C /Delay	LOS		
1	141st Street at Vermont Ave	U	10.4	B	10.6	B	0.2	No	10.7	B	10.8	B	0.1	No
2	Rosecrans Ave at Budlong Ave	S	0.586	A	0.587	A	0.001	No	0.607	A	0.608	A	0.001	No
3	Rosecrans Ave at Vermont Ave (ICU)	S	0.691	B	0.699	B	0.008	No	0.787	C	0.791	C	0.004	No
	Rosecrans Ave at Vermont Ave (CMA)	S	0.688	B	0.697	B	0.009	No	0.800	C	0.805	C	0.005	No
S = Signalized intersection; U = Unsignalized intersection ICU = Intersection Capacity Utilization; CMA = Critical Movement Analysis; LOS = Level of Service ICU and CMA values are expressed as volume-to-capacity (v/c) ratio. Delay is expressed in average seconds of delay per peak hour vehicle. LOS shown in **Bold** indicates unacceptable Level of Service.														

BUILDOUT CONDITIONS

The proposed Project would require a General Plan Amendment, therefore, an analysis of peak hour operating conditions for General Plan Buildout conditions has been conducted.

Buildout Without Project Conditions

To develop General Plan Buildout forecasts, the growth between Existing Conditions and Buildout Conditions was determined using the 0.38 % annual growth rate that was used to develop buildout traffic forecasts for the most recent GGP update. Buildout traffic forecasts at the study intersections are shown on **Exhibit 4.16-8: Buildout 2035 Without Project Peak Hour Traffic Volumes**.

The Buildout Without Project analysis results and LOS for the study intersections are presented in **Table 4.16-7: Summary of Intersection Operation Buildout Year 2035 Without Project**. Review of this table shows that, with the applied growth factor, all study intersections would operate at LOS D or better in both peak hours.

TABLE 4.16-7: SUMMARY OF INTERSECTION OPERATION BUILD-OUT YEAR 2035 WITHOUT PROJECT						
Int. #	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			V/C /Delay	LOS	V/C /Delay	LOS
1	141st Street at Vermont Ave	U	10.3	B	10.6	B
2	Rosecrans Ave at Budlong Ave	S	0.609	B	0.631	B
3	Rosecrans Ave at Vermont Ave (ICU)	S	0.703	C	0.809	D
	Rosecrans Ave at Vermont Ave (CMA)	S	0.702	B	0.825	D

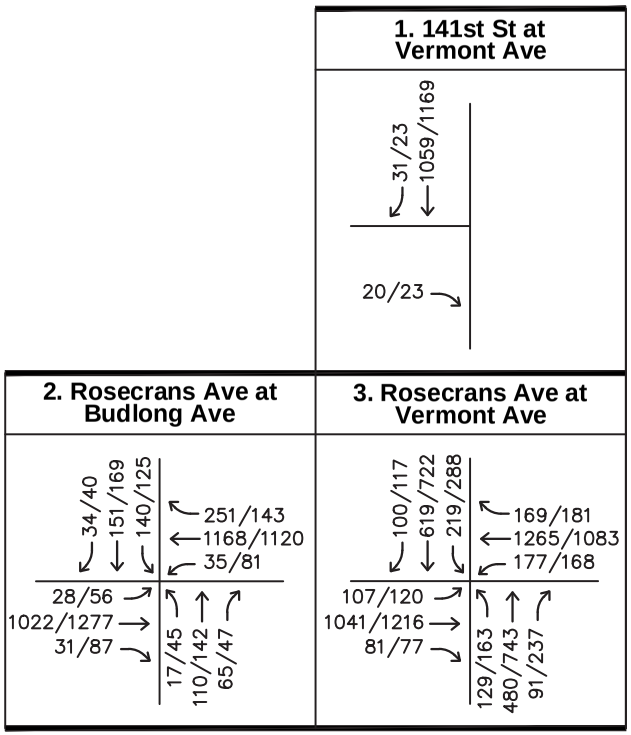
S = Signalized intersection; U = Unsignalized intersection
ICU = Intersection Capacity Utilization; CMA = Critical Movement Analysis; LOS = Level of Service
ICU and CMA values are expressed as volume-to-capacity (v/c) ratio.
Delay is expressed in average seconds of delay per peak hour vehicle.
LOS shown in **Bold** indicates unacceptable Level of Service.

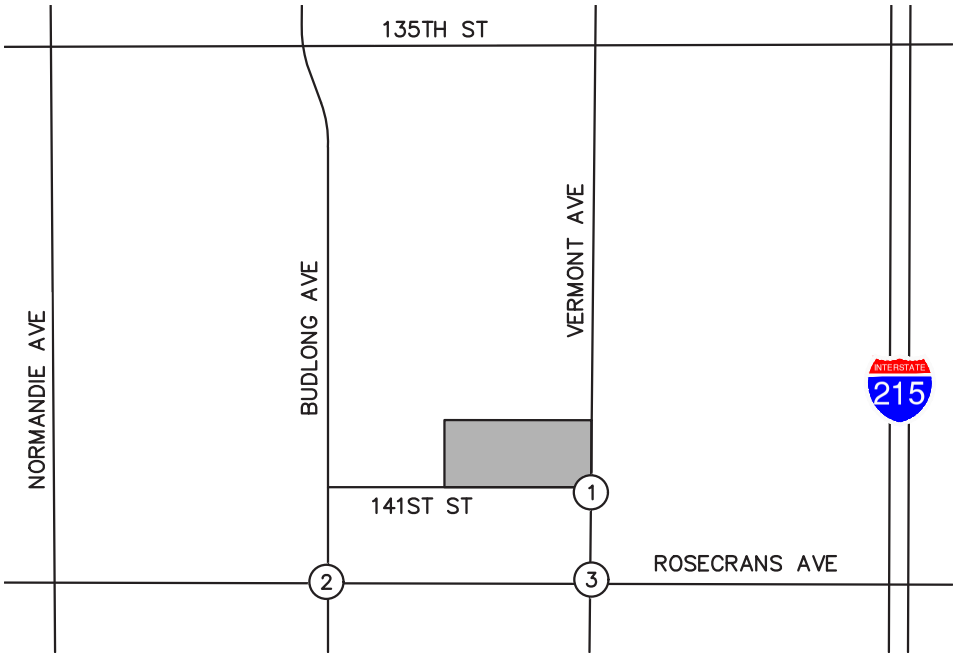
Buildout With Project Conditions

Project-related traffic was added to the Buildout Without Project traffic volumes. Buildout With Project peak hour turning movement volumes at the study intersections are shown on **Exhibit 4.16-9: Buildout 2035 With Project Peak Hour Traffic Volumes**. Buildout With Project peak hour intersection operations are summarized on **Table 4.16-8: Summary of Intersection Operation Buildout Year 2035 With Project**. With the addition of Project traffic, all study intersections would continue to operate at LOS D or better in both peak hours.

TABLE 4.16-8: SUMMARY OF INTERSECTION OPERATION BUILD-OUT YEAR 2035 WITH PROJECT														
Int. #	Intersection	Traffic Control	AM Peak Hour						PM Peak Hour					
			Without Project		With Project		Project Impact	Impact Sig?	Without Project		With Project		Project Impact	Impact Sig?
			V/C /Delay	LOS	V/C /Delay	LOS			V/C /Delay	LOS	V/C /Delay	LOS		
1	141st Street at Vermont Ave	U	10.3	B	10.5	B	0.2	No	10.6	B	10.7	B	0.1	No
2	Rosecrans Ave at Budlong Ave	S	0.609	B	0.610	B	0.001	No	0.631	B	0.632	B	0.001	No
3	Rosecrans Ave at Vermont Ave (ICU)	S	0.703	C	0.710	C	0.007	No	0.809	D	0.813	D	0.004	No
	Rosecrans Ave at Vermont Ave (CMA)	S	0.702	B	0.711	C	0.009	No	0.825	D	0.832	D	0.007	No

S = Signalized intersection; U = Unsignalized intersection
ICU = Intersection Capacity Utilization; CMA = Critical Movement Analysis; LOS = Level of Service
ICU and CMA values are expressed as volume-to-capacity (v/c) ratio.
Delay is expressed in average seconds of delay per peak hour vehicle.
LOS shown in **Bold** indicates unacceptable Level of Service.





LEGEND:

- = Project Site
- (X) = Study Intersection
- XX/YY = AM / PM Peak Hour Turning Movement Volumes

Source: Traffic Impact Study for the Stonefield 63 Project, Kimley-Horn and Associates, Inc. October, 2018.

Exhibit 4.16-8
Buildout Year 2035 Without Project Peak Hour Traffic Volumes

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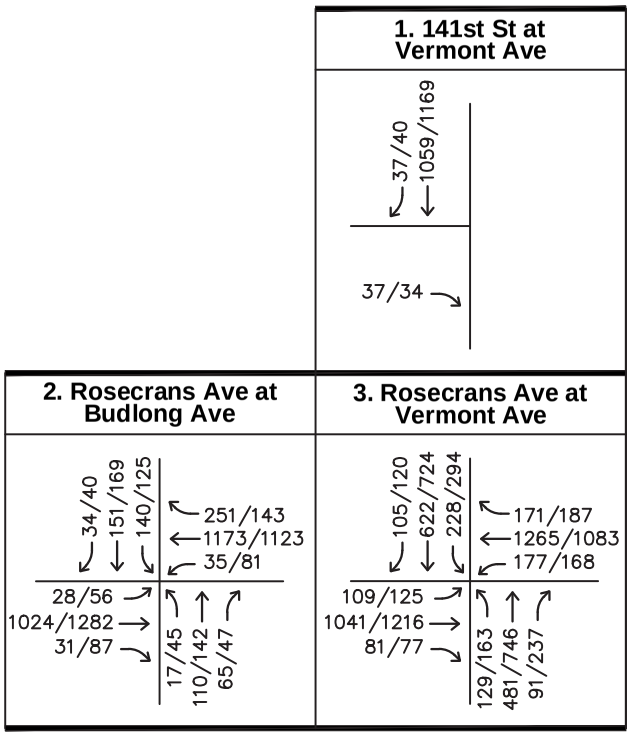

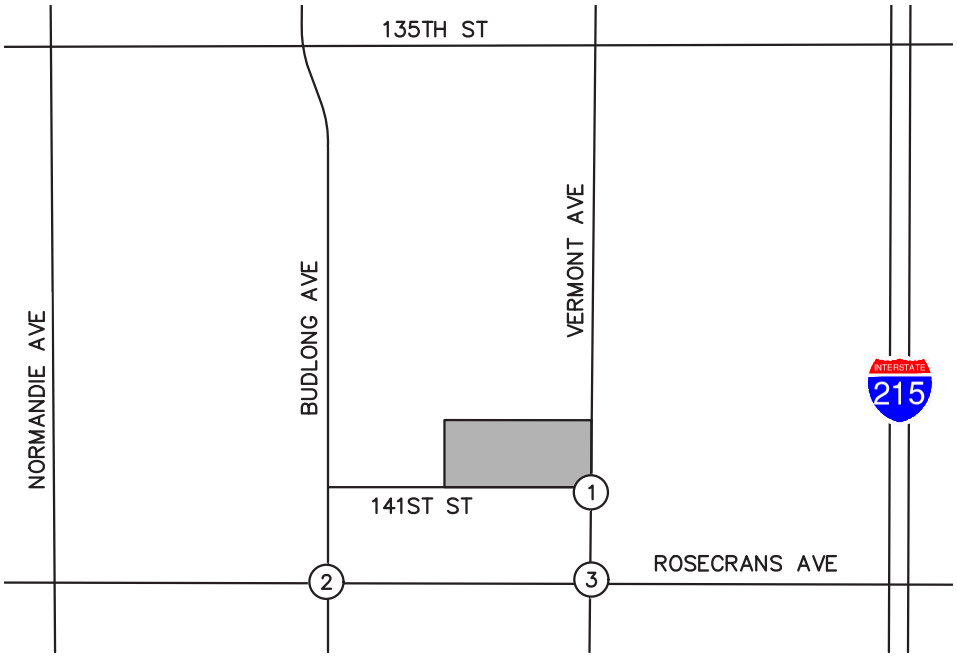

LEGEND:

- = Project Site
- (X) = Study Intersection
- XX/YY = AM / PM Peak Hour Turning Movement Volumes

Source: Traffic Impact Study for the Stonefield 63 Project, Kimley-Horn and Associates, Inc. October, 2018.

Exhibit 4.16-9
Buildout Year 2035 With Project Peak Hour Traffic Volumes

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Based on the analysis of each scenario, the Project would not result in a significant impact to any of the study intersections or roadway segments. Further, all on-site and site-adjacent improvements, including traffic signing/striping and Project driveways would be constructed in compliance with the City of Gardena Public Works Department. Sight distance at Project access points would comply with applicable City of Gardena and California Department of Transportation sight distance standards. Final grading, landscaping, and street improvement plans would comply with sight distance standards as well. Therefore, the Project would result in less than significant traffic-related impacts and no mitigation is required.

4.16b ***Would the Project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?***

Less Than Significant Impact. Los Angeles Metro is the Congestion Management Agency for Los Angeles County and responsible for implementing the Congestion Management Program (CMP). The purpose of the CMP is to develop a coordinated approach to managing and decreasing traffic congestion by linking the various transportation, land use, and air quality planning programs throughout the County. The CMP also addresses the impact of local growth on the regional transportation system. The Metro Board adopted the 2010 CMP for Los Angeles County in October 2010. The CMP requires review of substantial individual projects that might on their own impact the CMP transportation system. None of the Project study intersections are listed in the 2010 CMP. Further, the proposed Project's traffic contribution is not significant. The Project traffic analysis complies with the Los Angeles County CMP requirements. A less than significant impact would occur in this regard and no mitigation is required.

4.16c ***Would the Project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?***

No Impact. The proposed Project would not change air traffic patterns or levels such that an aviation-related safety risk would occur. No impact would occur in this regard and no mitigation is required.

4.16d ***Would the Project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

No Impact. The proposed Project does not include the use of any incompatible vehicles or equipment on site, such as farm equipment. The Project would not provide any offsite roadway improvements that could substantially increase hazards due to a design feature. The Project is compatible with the surrounding residential uses. All on-site and site-adjacent improvements, including traffic signing/striping and Project driveways, would be constructed as approved by the

City of Gardena Park Public Works Department. Sight distance at Project access points would comply with applicable City of Gardena/California Department of Transportation sight distance standards. Therefore, no impact would occur in this regard and no mitigation is required.

4.16e Would the Project result in inadequate emergency access?

Less Than Significant Impact. Vehicular access to the Project is proposed via a two-way driveway at the easterly West 141st Street cul-de-sac, from South Vermont Avenue. No vehicular access is proposed via the westerly West 141st Street cul-de-sac. Pedestrian access is proposed via a walkway from South Vermont Avenue adjacent to the proposed driveway. The proposed 141st Street width is 36 feet. The LACFD Fire Prevention Division has reviewed the Project and specified access requirements concerning minimum roadway width, fire apparatus access roads, fire lanes, signage, access devices and gates, and access walkways, among other requirements, which would enhance emergency access to the Project site.

Following compliance with LACFD access requirements, adequate emergency access to the Project site would be provided. Project impacts concerning emergency access would be less than significant and no mitigation is required.

4.16f Would the Project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. Pedestrian, bicycle, and transit facilities are in the Project area.

Transit service to the Project area is provided by LA Metro, which serves the greater Los Angeles metropolitan area; and by GTrans, the City of Gardena transit service. The bus stops closest to the Project site are located as follows:

- on the east and west sides of Vermont Avenue, south of 140th Street; and
- on the northwest and southwest corners of the Vermont Avenue at Rosecrans Avenue intersection.

Bus routes serving the Project area are described below.

LA Metro Route 125 operates between the Cities of Norwalk and El Segundo, traveling through the City of Gardena along Rosecrans Avenue in the Project vicinity. Route 125 operates on weekdays from approximately 4:30 AM to 10:00 PM, with 15- to 25-minute headways (the time between bus arrivals); on Saturdays from approximately 5:00 AM to 9:15 PM and on Sundays and Holidays from approximately 6:00 AM to 8:45 PM with approximately 30-minute headways.

GTrans Line 1X operates between the Redondo Beach Green Line Station and Downtown LA, traveling along Vermont Avenue and Rosecrans Avenue in the Project vicinity. Line 1X operates on weekdays from approximately 5:00 AM to 10:15 PM with 25- to 45-minute headways. On

weekends, Line 1X operates from approximately 7:30 AM to 8:00 PM with approximately 45-minute headways and does not go downtown; it stops at the Harbor Freeway Green Line Station.

GTrans Line 2 operates on a loop between PCH and Imperial Highway, traveling along Vermont Avenue in the Project vicinity. Line 2 operates on weekdays from approximately 4:40 AM to 10:00 PM with 15- to 30-minute headways. On weekends, Line 2 operates from approximately 5:00 AM to 9:30 PM with 40- to 40-minute headways.

A pedestrian sidewalk is currently provided along Project site frontage at Vermont Avenue and 141st Street. Budlong Avenue is designated as a Class III bike route. Class III bike routes are identified by signage along the street that denotes “BIKE ROUTE”, however, there is currently no bike route signage along Budlong Avenue in the Project vicinity.

The Project area would continue to be served by the existing transit system. Sidewalks would be provided along the Project frontages. The Project would not conflict with adopted policies, plans, or programs regarding alternative modes of transportation. Project impacts would be less than significant in this regard and no mitigation is required.

4.17 Tribal Cultural Resources

This Section is based on the *Assembly Bill 52 and Senate Bill 18 Consultation initiated by the City of Gardena*. The documents for the initiation process are included in **Appendix C2: Assembly Bill 52 and Senate Bill 18 Consultation**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k), or			X	
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

Impact Analysis

4.17a ***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 §5020.1(k)?***

4.17b ***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 §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?***

Less Than Significant Impact. Chapter 532 Statutes of 2014 (i.e., Assembly Bill [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."

There are no known Native American cultural resources on or within the immediate Project area. In compliance with PRC §21080.3.1(b), the City has provided formal notification to California Native American tribal representatives identified by the California NAHC. Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC §21074. The City has contacted the tribal representatives of the tribes noted below. Correspondence to and from tribal representatives is included as **Appendix C2**. As of this document's release date, the City has not received a request for consultation.

- AB52 Native American Group Contacted:
    - Gabrieleno Band of Mission Indians-Kizh Nation, Andrew Salas

Chapter 905 Statutes of 2004 (i.e., Senate Bill 18 (SB18) requires that lead agencies, "prior to the adoption or amendment of a city or county's general plan, conduct consultations with California Native American tribes for the purpose of preserving specified places, features, and objects that are located within the city or county's jurisdiction. The bill would define the term "consultation" for purposes of those provisions. By imposing new duties on local governments with respect to consultations regarding the protection and preservation of California Native American historical, cultural, and sacred sites, the bill would impose a state-mandated local program." There are no known Native American cultural resources on or within the immediate Project area. In compliance with PRC Section 21080.3.1(b), the City has provided formal notification to California Native American tribal representatives identified by the California Native American Heritage Commission. Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC §21074. The City has contacted the tribal representatives noted below. Correspondence to and from tribal representatives is included as **Appendix C2**. As of the release date of the Initial Study, the City has not received a request for consultation.

- SB18 Native American Groups Contacted:
    - Gabrieleno/Tongva Nation, Sandonne Goad
    - Gabrieleno-Tongva Tribe, Linda Candelaria
    - Gabrieleno-Tongva Tribe, Charles Alvarez
    - Gabrieleno/Tongva San Gabriel Band of Mission Indians, Anthony Morales
    - Gabrieleno Band of Mission Indians-Kizh Nation, Andrew Salas

The Project site has been extensively altered by prior ground disturbance and development. However, there is the potential for the Project to affect previously unidentified Native American tribal cultural resources. Construction activities would include excavation and grading. A COA was identified in Section 4.5, *Cultural Resources*, that would address potential impacts to archaeological resources. Specifically, the COA would require proper documentation and

treatment of discovery of archaeological resources. With implementation of this COA, potential impacts to tribal cultural resources would be less than significant and no mitigation is required.

4.18 Utilities and Service Systems

This Section is based on the *Sewer Area Study* (Forma Engineering Inc., October 2018), which is included in its entirety in **Appendix J: Sewer Area Studies** and the Preliminary Hydrology & LID Report and Peer Review, which is included in its entirety in **Appendix G: Hydrology and Water Quality Studies.** The Sewer Area Study and Preliminary Hydrology & LID Report were peer reviewed (Kimley-Horn, October 2018) and deemed adequate for CEQA purposes.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction or which could cause significant environmental effects?			X	
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			x	
d) Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?			x	
e) 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	
f) Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?			x	
g) Comply with federal, state, and local statutes and regulations related to solid waste?			x	

Impact Analysis

4.18a ***Would the Project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?***

4.18b ***Would the Project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?***

4.18e ***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. The Project's wastewater flow would discharge to a local sewer line for conveyance to the Sanitation Districts of Los Angeles County (Districts') East Rosecrans Avenue Trunk Sewer Section 1, located in Rosecrans Avenue at Normandie Avenue. The Districts' 15-inch diameter trunk sewer has a capacity of 1.5 million gallons per day (mgd) and conveyed a peak flow of 0.5 mgd when last measured in 2011. The wastewater generated by the proposed Project would be treated at the Joint Water Pollution Control Plant located in the City of Carson. The Plant has a capacity of 400 mgd and currently produces an average recycled water flow of 252.7 mgd. According to the Districts, the Project would generate approximately 12,189 gallons per day (gpd). The Districts are empowered by the HSC to charge a fee for the privilege of connecting to the Districts' Sewage System for increasing the strength or quantity of wastewater discharged from connected facilities. The fee payment would be required before a permit to connect to the sewer is issued.[26]

The Project site would be served by its own private sewer and a new line would be constructed from the Project to an existing City of Gardena public sewer system in 141st Street, west of the Project site. The point of connection would be at the existing terminal manhole per City of Gardena Plan No. 7-117, Sewer Wall Map line B-8, MH 8. No new public sewer improvements are proposed onsite or offsite. Through payment of fees and since the Project would not exceed the trunk sewer capacity, impacts would be less than significant, and no mitigation is required.

Additionally, the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities; see also Responses 4.9b and 4.18d.

[26] A. Raza, County Sanitation Districts of Los Angeles County, personal communication, August 28, 2018.

4.18d ***Would the Project have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?***

Less Than Significant Impact. The GSWC supplies water to the Project site. GSWC's *Final Draft 2015 Urban Water Management Plan - Southwest* (UWMP) Tables 7-2, 7-3, and 7-4 indicate water supplies would meet water demands for normal, single-dry, and multiple dry-year conditions through 2040. UWMP water demand forecasts are based on adopted General Plans.

The Project proposes General Plan Amendment GPA #1-18 to change the GGP land use designation from General Commercial to High Density Residential. The Project would change the site's land use designation to a more water-intensive use, thus, would increase water demands associated with the Project site beyond what the UWMP assumed/planned. However, GSWC has analyzed the proposed Project to determine if sufficient water supplies are available to serve the Project from existing entitlements and resources. GSWC has confirmed water service would be available to the Project site from GSWC's Southwest District water system, and service could be provided from their existing water facilities within West 141st Street.[27] Thus, GSWC would have adequate water supplies from existing entitlements. Project impacts concerning water demand would be less than significant and no mitigation is required. Further, GSWC provides conservation programs along with incentives to conserve water in the City. Although the GSWC service area population is expected to increase, the overall baseline potable demand in acre-feet per year (AFY) is expected to decrease due to further water use efficiency and recycled water programs.[28]

4.18e ***Would the Project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?***

Less Than Significant Impact. Refer to Response 4.9e.

4.18f ***Would the Project be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?***

4.18g ***Would the Project comply with federal, state, and local statutes and regulations related to solid waste?***

Less Than Significant Impact. Waste Resources Gardena provides solid waste and recycling services for the City's residential, commercial, and industrial customers. Waste Resources Gardena currently uses the Chiquita Canyon Sanitary Landfill for non-recyclable municipal solid waste by way of its transfer station Waste Resources Recovery, at 357 West Compton Boulevard,

[27] J. Zhao, P.E., PhD., personal communication, February 27, 2018.
[28] Golden State Water Company. (2016). *2015 Urban Water Management Plan – Southwest*. Rancho Cordova, CA: Kennedy/Jenks Consultants.

Gardena. Construction and demolition debris is sent either directly to a recycling partner or to California Waste Services for sorting and recycling.

The Project proposes to remove all existing onsite structures and surface parking lot and develop a residential community consisting of attached townhomes. Project implementation could increase solid waste disposal demands over existing conditions. State law requires a 65 percent diversion rate for construction and demolition (C&D) projects. The Gardena City Council has recently adopted Ordinance No. 1797 to update the GMC to comply with State law. Each C&D project for which a building/demolition permit is applied for and approved must achieve the waste diversion performance standard or show a good faith effort to achieve that standard.

Chiquita Canyon Sanitary Landfill is located at 29201 Henry Mayo Drive, Castaic, and its maximum permitted throughput is 6,000 tons per day (TPD). The facility's remaining and maximum capacities are approximately 8.6 million cubic yards and 63.9 million cubic yards, respectively.[29] Thus, the Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs. The City's estimated diversion rate for 2017 was 54%,[30] and the City would continue to recycle pursuant to regulatory requirements. Therefore, the Project's solid waste disposal needs could be accommodated at one or a combination of the disposal facilities discussed above. Operational activities would be required to comply with all applicable federal, State, and local statues and regulations for solid waste, including those identified under the 2016 (or most recent) CALGreen and AB 939. The Project would result in less than significant impacts concerning solid waste and no mitigation is required.

[29] California Department of Resources Recycling and Recovery (CALRecycle). (2018). *Solid Waste Information System (SWIS) Chiquita Canyon Sanitary Landfill (19-AA-0052)*. Retrieved from https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-0052/.

[30] Michelle Nicholls, personal communication [to Rita Garcia], November 7, 2018.

4.19 Mandatory Findings of Significance

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the Project have the potential to 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, 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) 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.)			X	
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

4.19a ***Does the Project have the potential to 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, 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 Impact. As discussed throughout the analyses contained in this Initial Study, the Project does not have the potential to degrade the quality of the environment or result in significant impacts to the environment that cannot be reduced to less than significant following compliance with the established regulatory framework (i.e., local, state, and federal regulations), Project COAs, and the recommended mitigation measures.

As concluded in Section 4.4, 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, the Project would not eliminate important examples of the major periods of California history or prehistory. No mitigation is required.

4.19b 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 issues: hazards, and noise. A Mitigation Program has been prepared for each of these environmental issue areas to reduce impacts to less than significant. Standard COA would also be imposed upon the Project. Other development projects within the City would also be subject to these requirements, as applicable.

All other Project impacts were determined either to have no impact or to be less than significant following compliance with the established regulatory framework, without the need for mitigation. Cumulatively, the proposed Project would not result in any significant impacts that would substantially combine with impacts of other current or probable future impacts; see also Responses 4.3e and 4.16a. Therefore, the proposed Project, in conjunction with other future projects, would not result in any cumulatively considerable impacts and no mitigation is required.

4.19c 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 proposed Project would have no potentially significant impacts. A Mitigation Monitoring and Reporting Program would be prepared to address these environmental issue areas to reduce impacts to less than significant levels. Standard conditions would also be imposed upon the Project. 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 and no mitigation is required.

5.0

References

5.0 References

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