Rosecrans Place Project – Revised Site Plan

Public Review Draft Initial Study/ Mitigated Negative Declaration

July 2020

Lead Agency:

City of Gardena
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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 Rosecrans Place Project – Revised Site Plan ("Project") would have a significant effect on the environment. The approximately 5.47-acre Project site is at 2101 and 2129 Rosecrans Avenue, in the City of Gardena ("City" or "Gardena"), California. The Project would remove all existing on-site structures and in their place construct a mixed-use (residential and live/work commercial) development with 113 dwelling units (DU) (57 attached townhouse units, 41 detached single-family units, and 15 live-work units), at a density of 20.7 dwelling units per net-acre (DU/net AC). The Project includes 3,949 square feet (SF) of workspace within the live-work units, and 295 parking spaces. The requested entitlements include a Vesting Tentative Tract Map and Site Plan Review.

State CEQA Guidelines §15063(b) states that if the Lead Agency determines that there is substantial evidence that any aspect of a project, either individually or cumulatively, may cause a significant effect on the environment, the Lead Agency shall prepare an Environmental Impact Report (EIR), use a previously prepared EIR, or determine, which of a project's effects were adequately examined by an earlier EIR or Negative Declaration (ND). Conversely, the Lead Agency shall prepare a ND 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:

- Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a ND;
- 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 ND;
- Assist in the preparation of an EIR, if one is required;
- Facilitate environmental assessment early in the design of a project;
- Provide documentation of the factual basis for the finding in a ND that a project will not have a significant effect on the environment;
- Eliminate unnecessary EIRs; and
- 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 a project, the Lead Agency shall consult informally with all Responsible Agencies and all Trustee Agencies responsible for resources affected by the project to obtain their recommendations as to whether an EIR, Mitigated Negative Declaration (MND), or ND should be prepared.

1.2 Summary of Findings

Pursuant to State CEQA Guidelines §15367, the City of Gardena, as the Lead Agency, has the authority for environmental review and adoption of the environmental documentation, in accordance with CEQA. This Initial Study 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, if any.

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:

- Biological Resources
- Cultural Resources
- Transportation
- Tribal Cultural Resources
- Mandatory Findings of Significance

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 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 20-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 and Technical Appendices are available for review on the City of Gardena Website, at https://www.cityofgardena.org/pending-projects, and by request at the Community Development Department- please contact John F. Signo, AICP, Senior Planner, at 310.217.9593 or via email at jsigno@cityofgardena.org.

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

John F. Signo, AICP
Senior Planner
City of Gardena, Community Development Department
1700 West 162nd Street
Gardena, CA 90247-3732
Email: jsigno@cityofgardena.org

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, an MND 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 MND's text.

The references outlined below, which were utilized during preparation of this Initial Study, are available for review on the City of Gardena Website, at https://www.cityofgardena.org/pending-projects, and by request at the Community Development Department- please contact John F. Signo, AICP, Senior Planner, at 310.217.9593 or via email at jsigno@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 to 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 GGP implementation. At the time of the GGP FEIR's writing, the City was 98.5 percent 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. Buildout was estimated to occur over 20 years. The GGP FEIR concluded significant and unavoidable impacts concerning Transportation and Traffic (GGP FEIR page 138).

Since GGP FEIR preparation, the Southern California Association of Governments (SCAG) Regional Housing Needs Assessment Allocation Plan fifth cycle, which was adopted in 2012, indicates that between 2014 and 2021, the City will need to accommodate development of 397 DU. The 2014-2021 Housing Element concluded adequate development capacity remained for the City to meet the Regional Housing Needs Assessment 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 IS/ND.

As of this writing, SCAG is in the process of finalizing the numbers for the 6th Cycle Housing Element (i.e., October 2021 through October 2029), which in draft allocates over 5,700 DU to

Gardena. The City contracted a consultant to update the Housing Element for the 6th Cycle and anticipates its completion by October 2021.

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 a Project introduction and overview, cites the CEQA Statute and Guidelines provisions to which the proposed Project is subject, and summarizes the IS' conclusions.

Section 2.0: Project Description details the Project's location, environmental setting, background and history, characteristics, discretionary actions, construction program, phasing, agreements, and required permits and approvals. This Section also identifies the IS' 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 potential impacts that may or may not result from Project implementation.

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

Section 5.0: References identifies resources used to prepare the IS.

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2.0 PROJECT DESCRIPTION

2.1 Location

The Rosecrans Place Project – Revised Site Plan (Project) site is in the County of Los Angeles (County), in the City of Gardena (Gardena, or the City), approximately 9.3 miles southwest of downtown Los Angeles; see **Exhibit 2-1: Regional Vicinity Map**. The Project site is at the City's northwest portion, approximately 0.5 mile south of the City's jurisdictional limits with the City of Hawthorne. The 5.47-acre Project site consists of APN # 4061-028-049 (Parcels 1 and 2) and APN # 4061-028-018 (Parcel 3) located northeast of the Rosecrans Avenue at Van Ness Avenue intersection, at 2101 and 2129 Rosecrans Avenue; see **Exhibit 2-2: Site Vicinity Map**.

Regional access to the Project site is provided via the Artesia Freeway (State Route 91 (SR-91)) located to the southeast, the San Diego Freeway (Interstate 405 (I-405)) located to the south and west, the Harbor Freeway (State Route 110 (SR-110)) located to the east, and the Glenn Anderson Freeway (Interstate Route 105 (I-105)), located to the north. Local access to the Project site is provided via Rosecrans Avenue to the south, South Western Avenue to the east, and Van Ness Avenue to the west. One common driveway on Rosecrans Ave at the Project site's southern boundary provides vehicular access. A secondary driveway for emergency purposes is provided to the east of the common driveway.

2.2 Environmental Setting

Gardena encompasses approximately 6.0 square miles in Los Angeles County's South Bay region. Gardena is a fully urbanized city with 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 northwestern portion, in a predominantly industrial area, although residential uses exist to the south and west. The site is bounded by warehouses to the north, Rosecrans Avenue to the south, a self-storage facility to the east, and a U-Haul lot to the west. Vermont Avenue forms an eastern City boundary with the City of Los Angeles approximately 1.4 miles to the east of the site, and Crenshaw Boulevard forms a western City boundary with the City of Hawthorne approximately .55 mile to the west.

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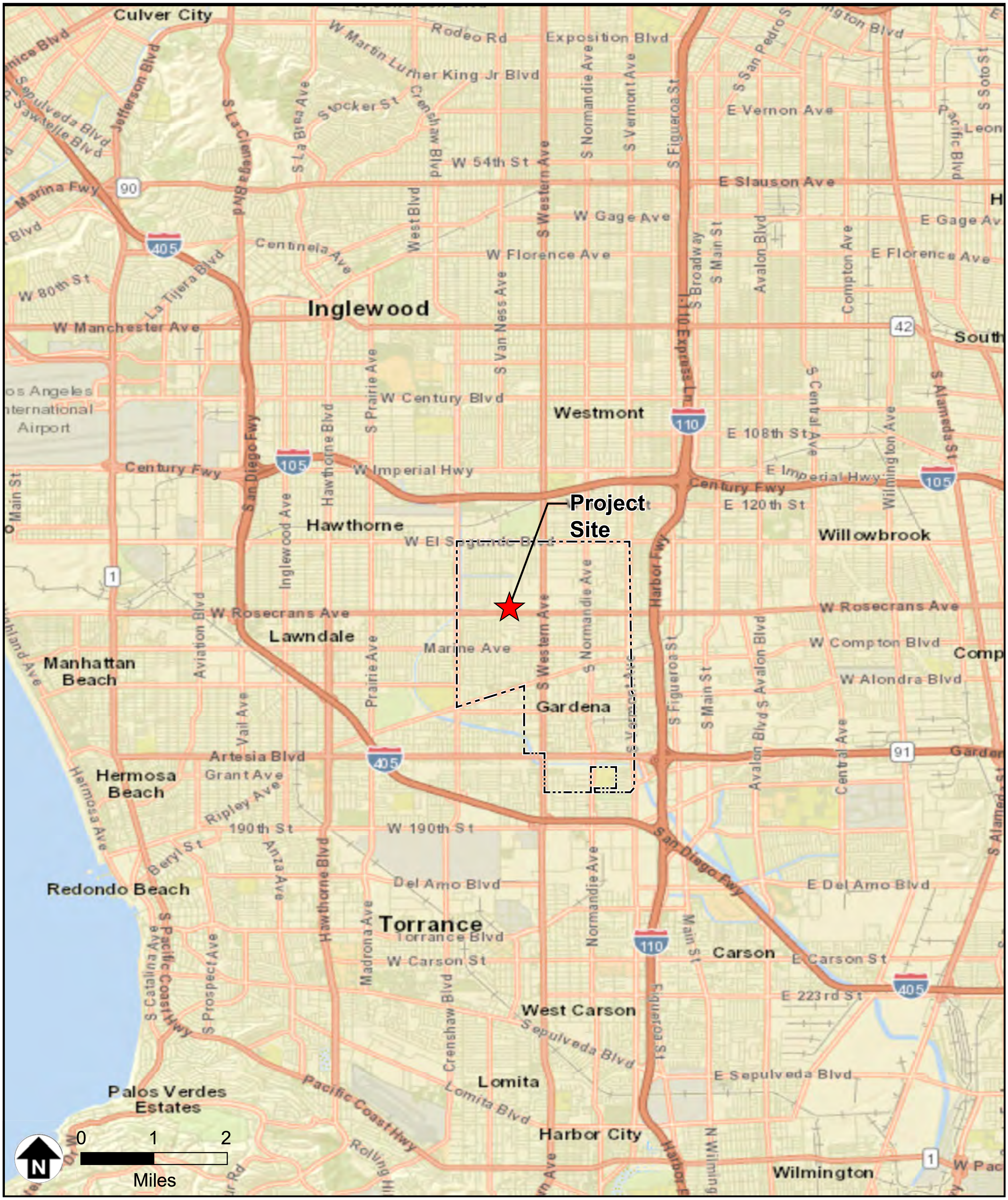

Source: ESRI World Street Map

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Rosecrans Place Project

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Exhibit 2-1

Regional Vicinity Map

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Source: Near Maps - Image Dated January 1, 2019

Kimley»Horn

Welcome To GARDENA

Rosecrans Place Project
Initial Study/Mitigated Negative Declaration

Exhibit 2-2
Site Vicinity Map

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2.2.1 ON-SITE LAND USES

The generally rectangular-shaped property is relatively flat and at an elevation of approximately 50 feet above mean sea level (amsl).[1] As depicted on Exhibit 2-2, the Project site is fully developed except an approximately 1.6-acre undeveloped area on the southeastern corner. Existing development consists of approximately 42,400 SF of commercial uses (circa 1976) comprised of three buildings (an approximately 11,500-SF office building, an approximately 5,400-SF building ancillary to the office building, and an approximately 25,500-SF automotive repair service building), surface parking, and drive aisles.[2] It is assumed the existing onsite land uses are fully occupied.

2.2.2 GENERAL PLAN AND ZONING

The GGP designates the Project site as General Commercial with a Mixed-Use Overlay (MUO).[3] The General Commercial designation provides for a wide range of larger-scale commercial uses to serve both the needs of the City and the region.[4] The MUO designation permits residential development on selected areas designated for commercial and industrial land uses.[5] The MUO designation's purpose is to allow greater flexibility of development alternatives, especially attractive higher density residential development in appropriate areas that are experiencing both physical and economic blight. Within the MUO designation, the maximum allowed intensity for non-residential uses is a floor-area ratio (FAR) of 0.5 and the maximum allowed density (stepped density) for residential uses is 30 DU/AC for lots greater than 1.0 AC.

The Zoning Map classifies the Project site as General Commercial Zone (C-3) with a Mixed-Use (MU) Overlay Zone, which is consistent with the GGP.[6] The MU Overlay Zone is intended to allow greater flexibility of development alternatives, especially attractive higher density residential development and live-work buildings, in appropriate City areas; see GMC Chapter 18.19: *Mixed-Use Overlay Zone (MU)*. If property is developed with a mix of residential and nonresidential uses within the same project area, then development is subject to GMC §18.19.030: *Uses Permitted*, and GMC §18.19.060: *Property Development Standards*.

2.2.3 SURROUNDING LAND USES

Land uses and zoning surrounding the Project site are as depicted on **Exhibit 2-2** and summarized in **Table 2-1: On-site and Surrounding Land Uses**.

1 G3 Urban. (2019). Vesting Tentative Tract Map No. 82667, 2129 Rosecrans Avenue, Gardena CA 90249: C&V Consulting, Inc.

2 ParcelQuest. (March 2020). *Assessor Data*. Retrieved from: https://pqweb.parcelquest.com/#home

3 City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006*. Figure LU-2: 2013 General Plan Land Use Policy Map. Gardena, CA: City of Gardena.

4 City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006*. Page LU-12. Gardena, CA: City of Gardena.

5 Ibid., Page LU-11.

6 City of Gardena. (January 2018). *Zoning Map*. Gardena, CA: City of Gardena Planning Division.

TABLE 2-1: ONSITE AND SURROUNDING LAND USES		
Description	**Existing On-the-Ground**	**Zoning[1]**
Project Site	Approximately 42,400 SF of commercial uses: • approximately 11,500-SF office building • approximately 5,400-SF building ancillary to the office building, and • approximately 25,500-SF automotive repair service building.[2]	General Commercial (C-3) with Mixed-Use (MU) Overlay
North	Industrial warehouses.	General Industrial (M-2), General Commercial (C-3) with Mixed-Use (MU) Overlay, Single-Family Residential (R-1), Medium Density Residential (R-3)
South	Light industrial uses on the south side of Rosecrans Avenue. Directly south of those uses are single-family residential uses. South of Rosecrans Avenue, between Crenshaw Boulevard and Western Avenue, are commercial and light industrial uses.	General Commercial (C-3) with Mixed-Use (MU) Overlay Single-Family Residential (R-1) Medium-Density Multiple-Family Residential (R-3)
East	Industrial with self-storage and manufacturing.	General Industrial (M-2)
West	Commercial uses (i.e., a U-Haul lot and vacant restaurant) are immediately west of the Project site.	General Commercial (C-3) with Mixed-Use (MU) Overlay
Sources: (1) City of Gardena. (January 2018). *Zoning Map*. Gardena, CA: City of Gardena Planning Division. (2) ParcelQuest. (March 2020). *Assessor Data*. Retrieved from: https://pqweb.parcelquest.com/#home		

2.3 Background and History

As previously noted, the Project site is occupied by a commercial use, automotive repair and taxi service building, and associated surface parking, along with a portion of undeveloped land in the southeastern corner of the Project site.

On May 28, 2019, the Project Applicant (G3 Urban) submitted an application to the City for a mixed-use development consisting of 5,080 SF of live-work commercial uses and 105 residential DU, including 15 live-work units with 5,080 SF of work space (i.e., "original site plan"). An IS/MND was prepared for the original site plan and released for a 20-day public review period, which began on April 2, 2020 and ended on April 21, 2020. However, on April 7, 2020, the Project Applicant submitted a revised site plan (i.e., "proposed Project"), which replaced the commercial uses with eight additional DU of the same type and configuration as those proposed in the original site plan. The revised site plan is the proposed Project subject of this IS/MND.

2.4 Project Characteristics

2.4.1 Project Overview

The Project Applicant seeks approval of the proposed Rosecrans Place Project – Revised Site Plan. The Project proposes a mixed-use (residential and live-work commercial) development with 113 DU at a density of 20.7 DU/net AC), 3,949 SF of work space, and 295 parking spaces; see **Exhibit**

2-3: Conceptual Site Plan.[7] All buildings would be three stories, although a two-story option would be available for the detached single-family units. The Project proposes to remove all existing on-site improvements, including the commercial and automotive repair buildings, associated surface parking lot, and storage (approximately 42,400 SF). The requested entitlements include a Vesting Tentative Tract Map and Site Plan Review.

Site Plan. The Project proposes 57 attached townhouse DU with three floorplan options (1,690 SF-1,803 SF), 41 detached single-family garden court DU with four floorplan options (1,800 SF-2,505 SF), and 15 attached live-work DU (1,610 SF-1792 SF) with between 258 SF and 281 SF of workspace (3,949 SF total). As depicted on **Exhibit 2-3**, the proposed Site Plan involves 14 townhome buildings. Five buildings are on the site's eastern portion and nine on the western portion, with an internal street separating the two areas. Four private driveways running east-west and two private driveways running north-south separate buildings on each portion of the site. All parking faces the private driveways, with building frontages oriented to the shared walkways.

Open Space and Landscaping. The Project proposes a total of 68,268 SF of private and public open space including the following:

- Public/common open space (42,353 SF):
  - BBQ area: 2,224 SF
  - Paseos and terraces: 40,129 SF
- Private yard: 5,758SF
- Private deck: 20,157 SF

The proposed Conceptual Landscape Plan[8] shows landscaping along the site perimeters and dispersed throughout. The proposed plantings include various types of trees including Little Gem Magnolia trees, Jacaranda Trees, and Fern Pine trees, among others.

[7] G3 Urban. (2020). Overall Site Plan, Rosecrans Place, Gardena CA 90249: Angeleno Associates, Inc.

[8] G3 Urban. (2020). Landscape Plan, Rosecrans Place, Gardena CA 90249: Angeleno Associates, Inc., which is available for review on the City of Gardena Website, at https://www.cityofgardena.org/pending-projects, and by request at the Community Development Department- please contact John F. Signo, AICP, Senior Planner, at 310.217.9593 or via email at jsigno@cityofgardena.org.

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Source: Angeleno Associates

Rosecrans Place Project
Initial Study/Mitigated Negative Declaration

Exhibit 2-3
Conceptual Site Plan

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Recreational/Other Amenities. The Project proposes paved walkways between the residential buildings with landscaping on either side of these walkways (see also *Open Space and Landscaping, above*). Amenities include:

- Outdoor kitchen barbeque area
- Shade structures throughout
- Trellises with vines at site entrance
- Grass lawn areas adjacent to residential buildings

2.4.4 Parking and Access

In total, 295 residential parking spaces are proposed: 226 garage spaces, 21 stall guest spaces, 28 curbside guest spaces, and 20 live-work guest spaces (live-work guest spaces would be located outside of the entry gates).

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. In total, 113 DU are proposed, including 15 live-work units with 3,949 SF of work space, resulting in a total garage parking demand of 226 spaces for the residential uses, which meets the City's garage parking standard. GMC §18.40.070: *Additional Standards for Residential Parking Areas*, specifies that guest parking be provided for residential developments of more than one unit at 0.5 spaces per DU. In total, 98 DU are proposed (excluding live-work units), resulting in a total guest parking demand of 49 guest parking spaces for the residential uses. The Project proposes 49 guest parking spaces (21 guest stall spaces and 28 curbside guest spaces), thus meeting the City's guest parking standard.

GMC Section 18.19.060J specifies that for live-work units, 0.5 guest spaces is required per unit, plus three additional spaces per 1,000 SF of non-residential SF. The Project proposes 15 live-work units with a total of 3,949 SF of work space, resulting in a total live-work guest parking demand of 20 live-work guest spaces (8 guest spaces plus 12 additional spaces). The Project proposes 20 live-work guest parking spaces, thus meeting the City's guest parking standard.

The Project's total residential parking demand is 295 spaces. The Project proposes 295 spaces, thus meeting the City's parking standard.

Primary vehicular access to the Project site is proposed via a two-way driveway at the southern boundary at Rosecrans Avenue. Vehicular metal sliding gates designed to meet Los Angeles County Fire Department (LACFD) standards and a visitor kiosk/pilaster (with telephone keypad) are proposed at the main entry to the townhouse, detached single-family, and garden court DU. The live-work DU would be outside the proposed gate. Two secondary/emergency vehicle access roads equipped with a LACFD knox box are proposed at the Project site's southeastern and southwestern corners at Rosecrans Avenue. Pedestrian access is proposed via the primary entrance on Rosecrans Avenue.

2.4.5 Utilities and Infrastructure

Golden State Water Company (GSWC) would purvey water to the Project site, with one connection proposed (at the site's primary entrance) to an existing 12-inch water main within Rosecrans Avenue.

The Project site is within the jurisdictional boundaries of Sanitation Districts of Los Angeles County Sanitation District No. 5 (LACSD). The Project's wastewater would discharge to the local City sewer line for conveyance to a LACSD's trunk sewer. Access to the City's sanitary sewer system would be provided with connection to an existing 8-inch line within Rosecrans Avenue, at the site's primary entrance.

Proposed drainage improvements include four catch basins located on the southern end of the site near Rosecrans Avenue. In the proposed condition, the site's stormwater would be conveyed from the four catch basins through a storm drain to a proposed 18-inch storm drain located in Rosecrans Avenue.[9]

All proposed homes would be solar-powered and all-electric; no natural gas would be provided.

2.4.6 Vesting Tentative Tract Map

The Project proposes Vesting Tentative Tract Map (VTTM) # 82667 to create one residential lot for the 113 condominiums. The VTTM also proposes two easements: an easement to the City for public service vehicular access and emergency access over the private streets; and a public utility easement.

2.4.7 Requested Entitlements

The Project requests approval of the following entitlements:

- Vesting Tentative Tract Map (VTTM) #8266710 to create one 5.47-acre lot for residential condominium purposes; and Site Plan Review (SPR) #11-18 to approve the proposed Site Plan.

2.5 Project Construction Activities and Phasing

Project construction is anticipated to occur over a single-phase, lasting approximately 30 months, beginning late 2020, and ending in 2022. Project construction is anticipated to occur in the following sequence:

- Demolition,
- Site preparation,
- Grading,
- Building construction, and
- Paving, architectural coating, and landscaping.

[9] C&V Consulting, Inc. (November 2019). Preliminary Hydrology Study. Lake Forest, CA: C&V Consulting, Inc.

Home construction timing would depend upon market conditions. For purposes of this environmental analysis, opening year is assumed to be 2022.

Grading for the proposed improvements would require cut and fill to create building pads. Grading is estimated to require 1,415 cubic yards of net import. Final grading plans would be approved by the City before Grading Permit issuance. All infrastructure (i.e., storm drain, water, wastewater, dry utilities, and street improvements) would be installed during grading.

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:

- Environmental Assessment EA #5-19
- Vesting Tentative Tract Map #82667
- Site Plan Review SPR #1-19 and

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3.0 ENVIRONMENTAL CHECKLIST FORM

3.1 Background

1.	**Project Title:** Rosecrans Place Project – Revised Site Plan
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:** John F. Signo, AICP, Senior Planner Tel: 310.217.9593 Email: jsigno@cityofgardena.org
4.	**Project Location:** County of Los Angeles, City of Gardena, at 2101 and 2129 Rosecrans Avenue
5.	**Project Sponsor's Name and Address:** Mr. Mitchell Gardner, President of Development G3 Urban 15235 South Western Avenue Gardena, California 90249
6.	**General Plan Designation:** General Commercial with a Mixed-Use Overlay (MUO)
7.	**Zoning:** General Commercial Zone (C-3) with a Mixed-Use Overlay Zone (MU)
8.	**Description of Project:** See **Section 2.4: Project Characteristics**
9.	**Surrounding Land Uses and Setting:** See **Section 2.2.3: Surrounding Land Uses**
10.	**Other public agencies whose approval is required (e.g., permits).** • Sanitation Districts of Los Angeles County Sanitation, District No. 15 • 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, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? Consultation with one California Native American tribe (Kizh Nation) was initiated on March 5, 2020; see also **Section 4.18: Tribal Cultural Resources**.	

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.

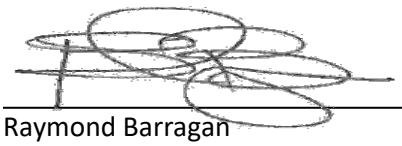
	Aesthetics		Agricultural and Forestry Resources		Air Quality
X	Biological Resources	X	Cultural Resources		Energy
	Geology and Soils		Greenhouse Gas Emissions		Hazards and Hazardous Materials
	Hydrology and Water Quality		Land Use and Planning		Mineral Resources
	Noise		Population and Housing		Public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

July 1, 2020
Date

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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
Except as provided in Public Resources Code §21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?				X
c) If in a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
Source: Kimley-Horn & Associates				

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, with no natural landforms or scenic features present. There are no State- or County-designated scenic highways in the Project site vicinity.[11] Therefore, the Project would not damage scenic resources within a state scenic highway, and no mitigation is required.

[11] California Department of Transportation. (2017). *California Scenic Highway.* Retrieved from https://www.arcgis.com/home/item.html?id=f0259b1ad0fe4093a5604c9b838a486a.

4.1c If in a non-urbanized area, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The Project site is in an urbanized area. The Project site is fully developed except an approximately 1.6-acre undeveloped area on the southeastern corner. The Project site is in the City's northwestern portion, in a predominantly industrial area, although residential uses exist to the south and west. The site is bounded by warehouses to the north, Rosecrans Avenue to the south, a self-storage facility to the east, and a U-Haul lot to the west. The Project proposes to remove all existing on-site improvements, and construct 113 three-story DU at a density of 20.7 DU/net AC. The maximum proposed building height would be 35 feet 6 inches (to roof ridge).

The on-site and surrounding zoning and the GMC regulations pertaining to each zone are as follows:

- Project Site (Existing): C-3 Zone (GMC Chapter 18.32) with a MU Overlay Zone (GMC Chapter 18.19).
- North: M-2 Zone (GMC Chapter 18.38: General Industrial Zone (M-2)).
- South: C-3 Zone (GMC Chapter 18.32) with a MU Overlay Zone (GMC Chapter 18.19), R-1 Zone (GMC Chapter 18.12: Single-Family Residential Zone (R-1)), and R-3 Zone (GMC Chapter 18.16: Medium-Density Multiple-Family Residential Zone (R-3)).
- East: M-2 Zone (GMC Chapter 18.38).
- West: C-3 Zone (GMC Chapter 18.32) with a MU Overlay Zone (GMC Chapter 18.19).

The regulations specified above do not include standards governing scenic quality. Additionally, the GMC does not include other regulations governing scenic quality. Therefore, the Project would not conflict with applicable zoning or other regulations governing scenic quality. No impact would occur concerning scenic quality, 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 industrial, residential, and street lighting along Rosecrans Avenue typical of urbanized 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 2.0-foot candle with no single point less than 1.0-foot candle for all public/common areas. It is noted that the City is considering an amendment to its development standards by reducing the lighting intensity. As such, the Project

is expected to comply with the current and amended standards. A Photometric Plan would be required prior to Building Permit issuance to verify compliance with GMC §18.42.150.

As part of the Project's Site Plan Review process concerning the Project's potential to adversely affect the surrounding area, the City's Community Development Department would review the Photometric Plan concerning 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 California Green Building Standards Code (CALGreen) (CCR Title 24 Part 11) in effect at the time that building plans are submitted, such that only the minimum amount of lighting is used, and no light spillage occurs.[12] 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 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.

[12] The current Code in effect is the 2019 California Green Building Standards Code: California Code of Regulations Title 24, Part 11. International Code Council.

4.2 Agricultural and Forestry Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §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
Source: Kimley-Horn & Associates				

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.[13] Further, the Project site is not the subject of a Williamson Act Contract.[14] The Project site is zoned C-3 Zone with a MU Overlay Zone.[15] 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 developed except an approximately 1.6-acre undeveloped area on the southeastern corner. 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.

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

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

[15] City of Gardena. (January 2018). *Zoning Map*. Gardena, CA: City of Gardena Planning Division.

4.3 Air Quality

This Section is based on the *Air Quality Assessment* (Kimley-Horn, January 2020), 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 district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	
Source: Kimley-Horn & Associates				

South Coast Air Quality Management District (SCAQMD) Thresholds

Mass Emissions 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 established thresholds of significance for air quality during project construction and operations; see **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 Average Daily Emissions (pounds/day)	Operational-Related 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 through 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 South Coast Air Basin (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. Gardena is located within SCAQMD SRA 3 (Southwest Coastal Los Angeles (LA) County). **Table 4.3-2: Local Significance Thresholds (Construction/Operations)** provides 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 a project site.

TABLE 4.3-2: LOCAL SIGNIFICANCE THRESHOLDS (CONSTRUCTION/OPERATIONS)				
Project Size	**Nitrogen Oxide (NO_x) – lbs per day**	**Carbon Monoxide (CO) – lbs per day**	**Coarse Particulates (PM_{10}) – lbs per day**	**Fine Particulates ($PM_{2.5}$) – lbs per day**
1.0 Acre:				
Construction	91	674	5	3
Operations	91	674	1	1
2.0 Acres:				
Construction	131	982	8	5
Operations	131	982	2	1
5.0 Acres:				
Construction	197	1,823	15	8
Operations	197	1,823	4	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 United States Environmental Protection Agency (USEPA) requires that each state with nonattainment areas 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 California Clean Air Act (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 within the South Coast Air Basin (SCAB), which is under SCAQMD's jurisdiction. The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce criteria pollutant emissions for which SCAB is in non-attainment. 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 and national air quality standards. The 2016 AQMP is a regional and multi-agency effort including the SCAQMD, the CARB, SCAG, and the Environmental Protection Agency (EPA). The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which 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.

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

- **Consistency Criterion No. 1**: A 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**: A proposed project would not exceed the AQMP's assumptions or increments based on the years of the project build-out phase.

Consistency Criterion No. 1 refers to the California ambient air quality standards (CAAQS) and national ambient air quality standards (NAAQS). As indicated in **Tables 4.3-3** and **Table 4.3-4** below, Project construction and operational emissions would be below SCAQMD's thresholds. As the Project would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance, the Project would not violate any air quality standard. Thus, the Project would be consistent with Criterion No. 1. No impact would occur, and no mitigation is required.

Consistency Criterion No. 2 refers to SCAG's growth forecasts and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities located within the SCAG region. Therefore, projects that are consistent with the applicable assumptions used in AQMP development would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

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. Therefore, it is reasonable to conclude that if a project is consistent with the applicable general plan land use designation, and if the general plan was adopted prior to the applicable AQMP, then the increase in vehicle miles traveled (VMT) and/or population generated by said project would be consistent with the AQMP's assumed VMT and population growth.

As discussed in detail in **Section 2.2.2**, the GGP designates the Project site General Commercial with a MUO. As discussed in detail in Responses 4.11b and 4.14a, the Project site's maximum general commercial development capacity is 119,137 SF and maximum residential development capacity is 164 DU, with a resultant population growth of approximately 464 persons. The Project proposes a mixed-use development consisting of 113 DU, including 15 live-work DU with 3,949 SF of work floor area, with a forecast population growth of approximately 320 persons; see Response 4.14a. The Project proposes residential and live/work commercial land uses, which would be below the General Commercial with a MUO designations' maximum allowable intensity/density, resulting in less population growth and less VMT than the allowable development; see also Responses 4.14a and 4.17a, respectively. The Project's proposed land uses would be consistent with and less than allowed under the GGP's land use designations, which are the basis for the AQMP. Therefore, the Project's forecast population growth and VMT would be consistent with the AQMP's assumed population growth and VMT. It is also noted that the Project's construction and operational air emissions would not exceed the SCAQMD regional thresholds, and localized emissions during construction and operations would not exceed SCAQMD LST thresholds; see Responses 4.3b and 4.3c below. As such, the Project would be

consistent with Criterion No. 2. A less than significant impact would occur and no mitigation is required.

4.3b Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact.

Construction Emissions

Project construction activities would generate short-term criteria air pollutant emissions. The criteria air 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-related 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 activities temporarily generate emissions from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and movement of construction equipment, especially on unpaved surfaces. Airborne particulate matter emissions are largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the application of water.

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. For purposes of this analysis, Project construction would occur over approximately 30 months, with demolition, site preparation, and grading anticipated to begin in Fall 2020. The exact construction timeline is unknown; however, to be conservative, earlier dates were utilized in the modeling. A March 2020 construction start data was used in the modeling results for a conservative analysis because CalEEMod uses cleaner emissions factors in future years due to regulatory and technological improvements and fleet turnover. This approach is conservative given that emissions factors decrease in future years. See **Appendix A** for additional information regarding the construction assumptions used in this analysis.

Table 4.3-3: Construction-Related Emissions (Maximum Pounds Per Day) provides the Project's estimated maximum daily construction-related emissions and indicates all criteria pollutant emissions would remain below their respective thresholds. While impacts would be less than significant, the proposed Project would be subject to compliance with SCAQMD Rules 402, 403, and 1113, described in **Appendix A**, to further reduce specific construction-related emissions. The proposed Project emissions would not worsen ambient air quality, create additional violations of federal and state standards, or delay SCAB's goal for meeting attainment standards.

TABLE 4.3-3: CONSTRUCTION-RELATED EMISSIONS (MAXIMUM POUNDS PER DAY)						
Construction Year	**Reactive Organic Gases (ROG)**	**Nitrogen Oxide (NOx)**	**Carbon Monoxide (CO)**	**Sulfur Dioxide (SO2)**	**Coarse Particulate Matter (PM10)**	**Fine Particulate Matter (PM2.5)**
2020	4.16	44.84	25.04	0.07	10.03	6.27
2021	28.06	35.38	39.65	0.07	3.58	2.13
SCAQMD Threshold	75	100	550	150	55	150
Exceed SCAQMD Threshold?	No	No	No	No	No	No
Notes: SCAQMD Rule 403 Fugitive Dust applied. 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 stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. SCAQMD CEQA Handbook reductions percentages (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment; see **Appendix A** for model outputs. Additionally, the March 2020 construction timing results in a conservative analysis because CalEEMod uses cleaner emissions factors in future years due to improved emissions controls and fleet turnover. Therefore, if the opening year is delayed, emissions would be lower than analyzed.						
Source: CalEEMod version 2016.3.2; see **Appendix A** for model outputs.						

Operational Emissions

The Project's operational emissions would be associated with area sources, energy sources, and mobile sources. CalEEMod was used to calculate the Project's area source, energy source, and mobile source pollutant emissions. **Table 4.3-4: Operational Emissions (Maximum Pounds Per Day)** provides the CalEEMod estimated emissions from Project operations. It is noted that emission 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.

Area Source Emissions. Area-specific CalEEMod default inputs were used to calculate the Project's area source emissions. Area source emissions would be generated from gasoline-powered landscaping and maintenance equipment, and consumer products (such as household cleaners). Area source emissions would also be generated from consumer products, architectural coatings, hearths, and landscaping that were previously not present on the Project site. Typically, area sources are small sources that contribute very little emissions individually, but when combined may generate substantial amounts of pollutants.

Energy Source Emissions. CalEEMod default inputs were used to calculate the Project's energy source emissions. Energy source emissions would be generated from the Project's electricity usage, since all proposed DU would be solar-powered and all-electric, thus, there would be no natural gas usage. The Project's primary uses of electricity would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.

Mobile Source Emissions. Unaltered CalEEMod default inputs, vehicle mix, and trip distances were used to calculate the Project's mobile source emissions. Mobile source emissions are generated from motor vehicle use, 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.

TABLE 4.3-4: 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 ($PM_{2.5}$)**
Existing Site Emissions						
Area Sources	1.00	< 0.01	< 0.01	0.00	< 0.01	< 0.01
Energy Sources	0.02	0.18	0.15	< 0.01	0.01	0.01
Mobile Sources	0.39	1.72	4.47	0.01	0.95	0.26
Total Emissions	***1.42***	***1.91***	***4.63***	***0.01***	***0.97***	***0.28***
Project Summer Emissions						
Area Sources	3.55	0.11	9.33	< 0.01	0.05	0.05
Energy Sources	0.00	0.00	0.00	0.00	0.00	0.00
Mobile Sources	3.47	7.84	26.16	0.07	5.98	1.64
Total Emissions	***7.02***	***7.95***	***35.49***	***0.07***	***6.03***	***1.69***
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project Winter Emissions						
Area Sources	3.55	0.11	9.33	< 0.01	0.05	0.05
Energy Sources	0.00	0.00	0.00	0.00	0.00	0.00
Mobile Sources	3.13	8.32	25.47	0.07	5.98	1.64
Total Emissions	***6.68***	***8.43***	***34.80***	***0.07***	***6.03***	***1.69***
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Net Project Emissions						
Area Sources	2.55	0.11	9.33	< 0.01	0.05	0.05
Energy Sources	0.02	0.18	0.15	< 0.01	0.01	0.01
Mobile Sources	0.87	6.60	21.69	0.06	5.03	1.38
Total Emissions	***5.60***	***6.52***	***30.86***	***0.05***	***5.06***	***1.41***
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** for model outputs.						

As discussed in detail in Response 4.17a, the Project would generate 818 average daily trips (ADT). This trip generation estimate is conservative given trip credits for the existing land uses that would be displaced have not been applied. When trip credits for the existing commercial, automotive repair, and taxi service uses are applied to the Project's trip generation estimates, the Project's net new trips would be offset, with proportionate offsets in mobile source emissions. Notwithstanding, for a conservative approach, this analysis assumes a traffic increase of 818 ADT, excluding displacement trip credits.

Total Emissions. **Table 4.3-4** summarizes the CalEEMod estimated emissions from Project operations and indicates the Project's unmitigated area, energy, and mobile source emissions combined would not exceed SCAQMD thresholds for either summer or winter seasons for any criteria air 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. Additionally, the Project is a higher density mixed-use infill development with various features that create a walkable space, including 42,353 SF of common open space and 25,915 SF of private open space (patios and balconies).

Cumulative Short-Term Emissions

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's construction-related emissions by themselves would not 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 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 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 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.

Cumulative Long-Term Impacts

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 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 indicated 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.

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

Less Than Significant Impact.

Localized Construction Significance Analysis

The nearest sensitive receptors to the Project site are the single-family residential uses south of Rosecrans Avenue, located approximately 310 feet (94 meters) south of the Project site. 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, the data provided in **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 LSTs is SCAQMD 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. Based on the amount of equipment modeled per SCAQMD LST methodology, project construction is anticipated to disturb a maximum of 3.5 acres in a single day given construction involves the use of staging and sequencing, which generally prevents the entirety of a site from being disturbed in a single day. It should be noted that LSTs are screening thresholds and are therefore conservative. The construction LST acreage is determined based daily acreage disturbed and it should be noted that the LSTs increase as site acreage increases. Although the Project site is greater than five acres, the 3.5-acre construction LSTs are conservatively used to evaluate the Project.

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
Site Preparation	Rubber Tired Dozers	3	0.5	8	1.5
	Tractors/Loaders/Backhoes	4	0.5	8	2.0
Total Acres Graded per Day					3.5

Source: CalEEMod version 2016.3.2; see **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. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500

meters. Therefore, as recommended by the SCAQMD, because the sensitive receptors located nearest the Project site are the single-family residential uses approximately 310 feet (94 meters) to the south, LSTs for receptors located at 100 meters were utilized in this analysis for receptors closer than 100 meters. Additionally, each construction activity would occur consecutively, not concurrently (i.e., emissions from construction activities would not overlap with other construction activities) and are therefore analyzed separately. **Table 4.3-6: Localized Significance of Construction Emissions (Maximum Pounds per Day)**, presents the results of localized Project construction emissions and indicates that on the peak day of construction, these pollutant emissions would not result in significant concentrations at nearby sensitive receptors. Further, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which would include Best Management Practices (BMPs) (i.e., watering, screening, covering, etc.) that would control fugitive dust. Therefore, the Project's construction-related activities would result in a less than significant impact concerning LSTs.

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 (2020)	33.20	21.75	5.30	2.09
Site Preparation (2020)	42.41	21.51	9.84	6.22
Grading (2020)	26.38	16.05	4.05	2.59
Building Construction (2020)	19.19	16.84	1.11	1.05
Building Construction (2021)	17.43	16.57	0.95	0.90
Paving (2021)	12.91	14.65	0.67	0.62
Architectural Coating (2021)	1.52	1.81	0.09	0.09
SCAQMD Localized Screening Threshold (2 acres at 100 meters)	139	1,697	37	12
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

Source: CalEEMod version 2016.3.2; see **Appendix A** for model outputs.

Localized Operational Significance Analysis

LSTs for receptors located at 100 meters for SRA 3 were utilized in this analysis. The Project site is 5.47-acres; therefore, the 5-acre threshold was conservatively used. **Table 4.3-7: Localized Significance of Operational Emissions**, compares the on-site operational emissions to the LST thresholds and indicates the Project's maximum daily operational emissions of these pollutants would not result in significant concentrations at nearby sensitive receptors. Therefore, Project operations would result in a less than significant impact concerning LSTs.

TABLE 4.3-7: LOCALIZED SIGNIFICANCE OF OPERATIONAL EMISSIONS (MAXIMUM POUNDS PER DAY)				
Activity	**Nitrogen Oxide (NO_x)**	**Carbon Monoxide (CO)**	**Coarse Particulate Matter (PM_{10})**	**Fine Particulate Matter ($PM_{2.5}$)**
On-Site Emissions (Area Sources)	0.10	9.30	0.05	0.05
SCAQMD Localized Screening Threshold	139	1,697	9	3
(5 acres at 100 meters)	**No**	**No**	**No**	**No**
Source: CalEEMod version 2016.3.2; see **Appendix A** for model outputs.				

The proposed Project would not involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants, and no significant toxic airborne emissions would result from Project operations. Project construction activities are subject to regional, state, and federal regulations and laws concerning toxic air pollutants that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, Project impacts concerning the release of toxic air contaminants would be less than significant.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (Sierra Club v. County of Fresno [Friant Ranch, L.P.] [2018] 6 Cal.5th 502). The SCAQMD set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the South Coast Air Basin) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based federal ambient air quality standards. The federal ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts would occur.

NO_X and ROG are precursor emissions that form ozone in the atmosphere in the presence of sunlight where the pollutants undergo complex chemical reactions. It takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources. Breathing ground-level ozone can result in health effects that include reduced lung function, inflammation of airways, throat irritation, pain, burning, or discomfort in the chest when taking a deep breath, chest tightness, wheezing, or shortness of breath. In addition to these effects, evidence from observational studies strongly indicates that higher daily ozone concentrations are associated with increased asthma attacks, increased hospital admissions, increased daily mortality, and other markers of morbidity. The consistency and coherence of the evidence for effects upon asthmatics suggests that ozone can make asthma symptoms worse and can increase sensitivity to asthma triggers.

According to the SCAQMD's 2016 AQMP, the Basin's ozone, NO_X, and ROG have been decreasing since 1975 and are projected to continue to decrease in the future. Although the Basin's VMT continue to increase, NO_X and ROG levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_X emissions from electric utilities have also decreased due to the use of cleaner fuels and renewable energy. The 2016 AQMP demonstrates how the SCAQMD's control strategy to meet the 8-hour ozone standard in 2023 would lead to sufficient NO_X emission reductions to attain the 1-hour ozone standard by 2022. In addition, since NO_X emissions also lead to the formation of $PM_{2.5}$, the NO_X reductions needed to meet the ozone standards will likewise lead to improvement of $PM_{2.5}$ levels and attainment of $PM_{2.5}$ standards.

The SCAQMD's air quality modeling demonstrates that NO_X reductions prove to be much more effective in reducing ozone levels and will also lead to a significant decrease in $PM_{2.5}$ concentrations. NO_X-emitting stationary sources regulated by the SCAQMD include Regional Clean Air Incentives Market (RECLAIM) facilities (e.g., refineries, power plants, etc.), natural gas combustion equipment (e.g., boilers, heaters, engines, burners, flares) and other combustion sources that burn wood or propane. The 2016 AQMP identifies robust NO_X reductions from new regulations on RECLAIM facilities, non-refinery flares, commercial cooking, and residential and commercial appliances. Such combustion sources are already heavily regulated with the lowest NO_X emissions levels achievable but there are opportunities to require and accelerate replacement with cleaner zero-emission alternatives, such as residential and commercial furnaces, pool heaters, and backup power equipment. The AQMD plans to achieve such replacements through a combination of regulations and incentives. Technology-forcing regulations can drive development and commercialization of clean technologies, with future year requirements for new or existing equipment. Incentives can then accelerate deployment and enhance public acceptability of new technologies.

The 2016 AQMD also emphasized that beginning in 2012, continued implementation of previously adopted regulations will lead to NO_X emission reductions of 68 percent by 2023 and 80 percent by 2031. With the addition of 2016 AQMP proposed regulatory measures, a 30 percent reduction of NO_X from stationary sources is expected in the 15-year period between 2008 and 2023. This is in addition to significant NO_X reductions from stationary sources achieved in the decades prior to 2008.

As previously discussed, the Project's construction-related and operational emissions would not exceed SCAQMD thresholds, thus, would be less than significant; see **Table 4.3-3** and **Table 4.3-4**, respectively. The onsite Project emissions' localized effects on nearby receptors were also found to be less than significant; see **Table 4.3-6** and **Table 4.3-7**. The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations such as asthmatics, children, and the elderly. As shown above, Project-related

emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels more than the health-based ambient air quality standards.

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 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 Project area intersections from the Project's 818 ADT. Therefore, impacts would be less than significant in this regard.

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 toxic air contaminants (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 sensitive receptors nearest the Project site are single-family residence uses located approximately 310 feet (94 meters) south of the Project site, and further from the major Project construction areas.

Additionally, these sensitive receptors are buffered by existing uses (commercial and light industrial).

California Office of Environmental Health Hazard Assessment has not identified short-term health effects from diesel particulate matter (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 activities would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than five minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. Additionally, it is noted that the proposed Project would replace existing commercial, automotive repair, and taxi service uses, which use diesel vehicles (TAC sources) that idle on- and off-site. With Project implementation, TAC emissions from the existing commercial use, automotive repair and taxi service would cease. For these reasons, DPM generated by Project construction activities, in and of itself, would not expose sensitive receptors to substantial amounts of air toxins and the Project would result in a less than significant impact. No mitigation is required.

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

Less Than Significant Impact.

Construction

The Project would result in emissions other than those leading to odors; see Responses 4.3b and 4.3c above.

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

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

During construction, emissions from construction equipment, such as diesel exhaust and VOCs from architectural coatings and paving activities may generate odors. However, these odors would be temporary, are not expected to affect a substantial number of people, and would disperse rapidly. Therefore, the Project's construction-related impacts concerning odors would be less than significant.

Operations

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as odor sources (i.e., agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding). The Project proposes development of residential and live-work commercial uses, which would not

involve the types of uses that would emit objectionable odors affecting substantial numbers of people. The proposed Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, Project operations would not create objectionable odors. No impact would occur and no mitigation is required.

Cumulative Analysis

Cumulative Setting

The cumulative setting for air quality includes Gardena and SCAB. SCAB is designated as a nonattainment area for state standards of ozone, PM_{10}, and $PM_{2.5}$. 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 and Mitigation Measures

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 (see Response 4.3a), which is intended to bring 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.

4.4 Biological Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X
Source: Kimley-Horn & Associates				

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 state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project site is fully developed except an approximately 1.6-acre undeveloped area on the southeastern corner. No natural habitats are present on the property. The site is bounded by industrial warehouses to the north, Rosecrans Avenue to the south, industrial uses to the east, and commercial uses (i.e., a U-Haul lot and vacant restaurant) to the west. No natural habitats are present on these surrounding areas, and only landscaping including ornamental vegetation is present. Based on review of the 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 With Mitigation Incorporated. The Project site is fully developed except an approximately 1.6-acre undeveloped area on the southeastern corner. The Project site is also surrounded by urban development and not a recognized wildlife corridor. Therefore, site development would not impede fish or wildlife movement. However, a small portion of the undeveloped area contains vegetation and several trees (the remainder is grass and weeds). The on-site vegetation and trees could provide suitable nesting habitat for birds. The Project would clear and grade the Project site including the undeveloped area with the potential to support nesting migratory birds. The Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) are intended to protect migratory birds.

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). To address potential impacts to migratory birds, the Project would be subject to compliance with Mitigation Measure (MM) BIO-1, which addresses construction activities within the nesting season. Following compliance with MM BIO-1, the Project's potential impacts to nesting migratory birds would be less than significant.

Mitigation Measures

MM BIO-1 **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 the 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; *Permit*, 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 tree removal, 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 *Assembly Bill 52 Communications,* which are included in Appendix B2: Assembly Bill 52 Communications.

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

Impact Analysis

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

No Impact. The three existing onsite buildings were constructed circa 1976.[16] These existing buildings are less than 50 years old and are therefore not considered a historical resource. No impact would occur, 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 With Mitigation Incorporated. The Project site has been previously disturbed by past development; thus, the Project site is considered to have low archaeological sensitivity. Notwithstanding, the potential exists for accidental discovery of archaeological resources during ground-disturbing activities. As discussed in detail in **Section 4.18: Tribal Cultural Resources**, the City received a request for consultation pursuant to Assembly Bill 52 (AB 52) from the Gabrieleno Band of Mission Indians-Kizh Nation. Implementation of the mitigation measures identified by the Tribe is required to mitigate potential impacts to as-yet undiscovered tribal cultural resources; see MMs TCR-1 and TCR-2 in **Section 4.18**. MMs TCR-1 and TCR-2 detail the appropriate steps in the event of accidental discovery of cultural resources during ground-disturbing activities. Following implementation of MMs TCR-1 and TCR-2, the Project's potential impacts concerning the significance of an archaeological resource would be less than significant.

[16] ParcelQuest. 2020. *Assessor Data*. Retrieved from: https://pqweb.parcelquest.com/#home

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

Less Than Significant Impact. No dedicated 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 on-site 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 Energy

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	
Source: Kimley-Horn & Associates				

Background: Building Energy Efficiency Standards

Building energy efficiency standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission (CEC)) in June 1977 and are updated every three years (CCR Title 24, Part 6). CCR Title 24, Part 6 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. On May 9, 2018, the CEC adopted the 2019 Building Energy Efficiency Standards (2019 Standards), which went into effect on January 1, 2020.

The 2019 Standards improved upon the previous 2016 Standards for new construction of and additions and alterations to residential and nonresidential buildings. Under the 2019 Standards, residential buildings are anticipated to be approximately seven percent more energy-efficient and nonresidential buildings approximately 30 percent more energy-efficient due mainly to lighting upgrades.

CALGreen is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary measures (CALGreen Tier 1 and Tier 2) that local governments may adopt which encourage or require additional measures in the five topical areas.

Renewable Portfolio Standard

In 2002, California established its Renewable Portfolio Standard program[17] with the goal of increasing the annual percentage of renewable energy in the state's electricity mix by the equivalent of at least 1 percent of sales, with an aggregate total of 20 percent by 2017. The California Public Utilities Commission subsequently accelerated that goal to 2010 for retail sellers of electricity (*Public Utilities Code* §399.15(b)(1)). Then-Governor Schwarzenegger signed Executive Order S-14-08 in 2008, increasing the target to 33 percent renewable energy by 2020. In September 2009, then-Governor Schwarzenegger continued California's commitment to the Renewable Portfolio Standard by signing Executive Order S-21-09, which directs the CARB under its AB 32 authority to enact regulations to help the State meet its Renewable Portfolio Standard goal of 33 percent renewable energy by 2020. In September 2010, the CARB adopted its Renewable Electricity Standard regulations, which require all the state's load-serving entities to meet this target. In October 2015, then-Governor Brown signed into legislation Senate Bill 350, which requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. Signed in 2018, SB 100 revised the program's goal to achieve the 50 percent renewable resources target by December 31, 2026 and a 60 percent renewable resources target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Impact Analysis

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

Less Than Significant Impact.

Electricity

Southern California Edison (SCE) provides electricity to the Project area. Electricity is currently used by the Project site's existing commercial, automotive repair, and taxi uses. Total electricity demand in SCE's service area is forecast to increase by approximately 12,000 GWh—or 12 billion kWh—between 2015 and 2026.[18]

The Project's electricity demand is expected to be served by existing SCE electrical facilities. The Project's construction-related electrical demand is anticipated to be nominal, since most construction equipment would be gas- or diesel-powered. The Project's estimated operational electrical demand (approximately 678,897 kWh per year) would represent a less than significant

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

[18] California Energy Commission, *California Energy Demand 2018-2030 Revised Forecast, Figure 49 Historical and Projected Baseline Consumption SCE Planning Area*, April 2018.

percent increase compared to the SCE service area's overall demand. It is noted that the Project's energy consumption is conservative given that credit for the existing land uses that would be displaced has not been applied. It is also noted that the Project (i.e., design and materials) would be subject to compliance with the 2019 Building Energy Efficiency Standards. Prior to Building Permit issuance, the City of Gardena Building Division would review and verify that the Project plans demonstrate compliance with the current Building Energy Efficiency Standards. The Project would also be required to comply with CALGreen, which establishes planning and design standards for sustainable site development, energy efficiency (more than California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Therefore, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of electrical resources.

Natural Gas

Southern California Gas Company (SoCalGas) provides natural gas service to the Project area. Natural gas is currently used by the existing commercial, automotive repair, and taxi uses on the Project site. From 2018 to 2035, residential demand in the SoCalGas Service Area is expected to decline from 236 billion cubic feet (bcf) to 186 bcf per year, while supplies remain constant at 3,775 bcf[19] per year from 2015 through 2035.[20]

No construction-related natural gas demand is anticipated for the Project, since most construction equipment would be gas- or diesel-powered. Additionally, because the proposed residential uses would be all solar-powered and all-electric, no operational natural gas demand would occur for the Project. Therefore, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of natural gas resources.

Fuel

During Project construction, transportation energy use would depend on the type and number of trips, VMT, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would be from transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel/gasoline. The use of energy resources by these vehicles would fluctuate according to the construction phase and would be temporary. Most construction equipment during demolition and grading would be gas- or diesel-powered, and the later construction phases would require electricity-powered equipment. Impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or construction of new infrastructure. Therefore, Project construction would not result in wasteful, inefficient, or unnecessary fuel consumption.

During Project operations, residential energy consumption would be associated with resident and visitor vehicle trips, delivery truck trips, and maintenance and repair crew trips. Commercial energy consumption would be associated with employee and customer trips, delivery truck trips,

[19] 1 bcf is equivalent to about 1.03 billion kBTU.

[20] California Gas and Electric Utilities, *2018 California Gas Report, Southern California Gas Company Annual Gas Supply 2018-2035 page 66*, 2018.

and maintenance and repair crew trips. The gasoline and diesel fuel associated with on-road vehicular trips is calculated based on the Project's estimated VMT; see Sections 4.3 and 4.8. The Project's total gasoline and diesel fuel consumption associated with on-road trips would be approximately 118,914 gallons per year and 21,865 gallons per year, respectively. Los Angeles County's annual gasoline fuel use in 2018 was 3,868,517,088 gallons.[21] Estimated Project operational use of gasoline fuel would represent 0.003 percent of the County's 2018 gasoline use. The County's annual diesel fuel use in 2018 was 519,517,409 gallons.[22] Estimated Project operational use of diesel fuel would represent 0.004 percent of the County's 2018 diesel use. The Project is an infill mixed-use development near existing services, adjacent to existing industrial and commercial uses, near public transportation access, and near the I-405, I-110, and SR-91, reducing the need to travel long distances to a major highway and services. Consequently, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary fuel consumption.

None of the projected energy uses exceed one percent of their corresponding County use. It is noted that the Project's fuel consumption is conservative given credit for the existing land uses use that would be displaced has not been applied. Project operations would not substantially affect existing energy or fuel supplies or resources. The Project would be subject to compliance with applicable energy standards and new capacity would not be required. Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, the Project would result in a less than significant environmental impact concerning consumption of energy resources, and no mitigation is required.

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

Less Than Significant Impact. Project design and operations would be subject to compliance with State Building Energy Efficiency Standards, appliance efficiency regulations, and CALGreen standards. As concluded in Response 4.6a, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Gardena adopted an Energy Efficiency Climate Action Plan (EECAP) in 2015 to help reduce energy consumption and GHG emissions to become a more sustainable community and meet AB 32 goals. The EECAP outlines various municipal measures to achieve the City's long-term vision. The Project would not conflict with or obstruct implementation of the City's EECAP. Impacts would be less than significant in this regard, and no mitigation is required.

SCAG's 2016–2040 *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) establishes emissions goals for automobiles and light-duty trucks for 2020 and 2035, as well as an overall GHG target for the Project region consistent with both the AB 32 target date and Executive Orders 5-03-05 and B-30-15 post-2020 GHG reduction goals. The Project is consistent

[21] California Air Resources Board, EMFAC2017.

[22] Ibid.

with regional strategies to reduce passenger VMT (and thereby reduce transportation energy consumption). The proposed Project is within a major employment center and is near several major employers. Transit stops along Rosecrans Avenue connect the Project site to the remainder of the City and neighboring cities. Increasing residential land uses near major employment centers is a key strategy to reducing regional VMT. Therefore, in addition to being an efficient infill mixed-use development, the Project would be consistent with regional goals to reduce trips and VMT by locating the Project adjacent to other uses, which reduces vehicle trip lengths. The Project would not conflict with RTP/SCS state goals. Therefore, the Project would not interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets outlined in the 2016 RTP/SCS. Project impacts would be less than significant in this regard, and no mitigation is required.

4.7 Geology and Soils

This Section is based on the *Preliminary Geotechnical Investigation* (Albus-Keefe and Associates, Inc., April 2019), which is included in its entirety in **Appendix C1: Preliminary Geotechnical Investigation**. The City of Gardena Building Official reviewed and preliminarily approved the Preliminary Geotechnical Investigation.[23, 24] It is noted, the City will impose review of the Final Geotechnical Investigation as a COA.

[23] City of Gardena, *2129 Rosecrans Ave. Residential Department of Community Development Memorandum,* June 8, 2019.

[24] City of Gardena, *2129 Rosecrans Ave. Commercial Bldg. Department of Community Development Memorandum*, June 8, 2019.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	
Source: Kimley-Horn & Associates				

Impact Analysis

4.7ai Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

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 Project site is not located within an Alquist-Priolo Earthquake Fault Zone.[25] Additionally, no evidence exists of a known fault within or adjacent to the Project site. Therefore, the Project would not expose people or structures to adverse effects involving rupture of a known earthquake fault. Therefore, no impact would occur in this regard, and no mitigation is required.

4.7aii Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving strong seismic ground shaking?

Less Than Significant Impact. The City is located between several active fault zones including the Newport-Inglewood-Rose Canyon Fault Zone, Puente Hills (LA), and Palos Verdes Fault.[26] The zoned fault nearest the Project site is the Newport-Inglewood Fault zone, located 1.65 miles to the east. 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 1941 Torrance-Gardena Earthquake, with an epicenter approximately 4.67 miles southeast of the Project site.[27] Historic earthquakes with magnitudes of greater than or equal to 6.0 and have been epicentered within approximately 32 miles of the Project site.

The faults described above could cause moderate to intense ground shaking during the Project's lifetime. Additionally, the Project site has experienced earthquake-induced ground shaking in the past and can be expected to experience further shaking in the future. Therefore, Project implementation could expose people and structures to potential 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

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

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

[27] Southern California Earthquake Data Center. (2019). Significant Earthquakes and Faults. Retrieved from https://scedc.caltech.edu/significant/index.html

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: *General Building Provisions*, the City has adopted the 2019 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 Preliminary Geotechnical Investigation evaluated various geologic and seismic hazards based on site-specific parameters, including strong seismic ground shaking shrinkage, and subsidence). Preliminary Geotechnical Investigation Chapter 6.00 makes recommendations concerning seismic design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Preliminary Geotechnical Investigation concludes that the Project appears feasible from a geotechnical standpoint. A COA would be imposed on the Project requiring that the Applicant submit the Final Geotechnical Investigation for City review/approval and comply with its recommendations and any revisions deemed necessary by the City's Building Official. The Gardena Building Services Division would review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Geotechnical Investigation's recommendations. Following compliance with standard engineering practices, the established regulatory framework (i.e., GMC and CBSC), and the Preliminary Geotechnical Investigation's recommendations, the Project's potential impacts concerning exposure of people or structures to potential adverse effects involving strong seismic ground shaking would be less than significant, and no mitigation is required.

4.7aiii Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, 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 approximately 25 feet, and a potential for seismic shaking from nearby large-magnitude earthquakes.

The Preliminary Geotechnical Investigation noted that minor liquefaction below the Project site may occur due to periods of strong seismic ground shaking, with settlement being approximately 0.25 inches over 30 feet.[28] According to the California Geological Survey's Earthquake Zones of Required Investigation Inglewood Quadrangle Map, liquefaction has the potential to occur northeast of the Project site, near Compton, but is not shown to occur on the Project site.[29] This is further substantiated by GGP Safety Element Figure PS-2, *Public Safety Plan*, which does not

[28] Albus-Keefe and Associates, Inc. (2019). Preliminary Geotechnical Investigation.

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

show the Project site as being in a liquefaction zone. Additionally, depth to groundwater in the Project site area is between 24 and 26 feet.[30] The logs of the deep borings conducted as part of the Preliminary Geotechnical Investigation indicate that mostly clayey soils, which are typically non-liquefiable, are presented below 13 feet. The cited logs also showed layers with sandy soils and older alluvium above the clayey soils at depths ranging from 3 to 13 feet.[31] High blow counts were recorded in these granular units;[32] thus, they are considered to not be prone to liquefaction. Based on these conditions, the liquefaction hazard potential at the Project site is negligible. Therefore, the Project's potential impacts concerning exposure of people or structures to potential adverse effects involving liquefaction would be less than significant, and no mitigation is required. Further, as discussed in Response 4.7aii, the Gardena Building Services Division would review construction plans to verify compliance with standard engineering practices, the GMC/CBSC and the Preliminary Geotechnical Investigation's recommendations. Following compliance with standard engineering practices, the established regulatory framework (i.e., GMC and CBSC), and the Preliminary Geotechnical Investigation's recommendations, the Project's impacts involving substantial adverse effects, including the risks of loss, or death involving seismic-related ground failure, including liquefaction, would be less than significant, and no mitigation is required.

4.7aiv Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving landslides?

No Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. According to the California Geological Survey's Earthquake Zones of Required Investigation Inglewood Quadrangle Map, the Project site does not lie in a landslide hazard zone.[33] Since the site is relatively flat and not within a landslide hazard zone, no potential for earthquake-induced landsliding would occur. Therefore, the Project would not directly or indirectly cause potential adverse effects involving landslides. No impact would occur in this regard, and no mitigation is required.

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

Less Than Significant Impact. The Project site is relatively flat, and its geology is composed of artificial fills with thicknesses ranging between 2.0 and 3.0 feet. Given the site's topography, geology, and historic uses, the loss of topsoil is low. 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 GMC §8.70.110.B.1: *Development Construction*, 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

[30] Ramboll. (2019). Phase I Environmental Site Assessment and Supplemental Subsurface Investigation. Page 15.

[31] Ibid.

[32] Soil consistency is determined by a "blow count" reading, which measures soil density as generally measured by a standard penetrometer test (SPT).

[33] Ibid.

amendments) (Construction General Permit); see Response 4.9a, which specifies that no Grading Permit shall be issued to construction projects that disturb 1.0 or more acres of soil without obtaining a *General Construction Activity Stormwater Permit* (GCASWP) from the State Water Resources Control Board. Following compliance with the established regulatory framework (i.e., the GMC and Construction General Permit), the Project's potential impacts concerning soil erosion and loss of topsoil would be less than significant, and no mitigation is required.

4.7c Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

4.7d Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. The Project site would not be subject to seismically-induced liquefaction (see Response 4.7aiii) or landslides (see Response 4.7aiv). The Preliminary Geotechnical Investigation did not identify any potential for lateral spreading or collapse and concluded that subsidence is not anticipated. The Preliminary Geotechnical Investigation also concluded onsite soils have a "low to high" potential for expansion. As discussed in Response 4.7aii, Preliminary Geotechnical Investigation Chapter 6.00 makes preliminary recommendations concerning design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Gardena Building Services Division would review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Preliminary Geotechnical Investigation's recommendations, including those concerning expansive soils. Following compliance with standard engineering practices, the established regulatory framework (i.e., GMC and CBSC), and the Preliminary Geotechnical Investigation's recommendations, the Project would note create substantial direct or indirect risks to life or property concerning expansive soils. Therefore, impacts would be less than significant in this regard, and no mitigation is required.

4.7e Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. Sewers would be available for disposal of Project-generated wastewater; see Responses 4.19aii and 4.19aiii. The proposed Project would not utilize septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur in this regard, and no mitigation is required.

4.7f 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 earth's history and its past ecological settings. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area. Previous

construction-related excavation on the Project site has disturbed sediments beyond depths at which buried prehistoric cultural resources are likely. However, to address potential impacts to paleontological resources that may be discovered during ground-disturbing activities, the City would impose a COA, which details the appropriate steps should paleontological resources be encountered during ground-disturbing activities. Following compliance with the City's COA, the Project would not destroy a unique paleontological resource or site or unique geologic feature. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

4.8 Greenhouse Gas Emissions

This Section is based on the Greenhouse Gas Emissions Assessment (Kimley-Horn, January 2020), which is included in its entirety in **Appendix D: 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	
Source: Kimley-Horn & Associates				

City of Gardena Energy Efficiency Climate Action Plan

Gardena and the South Bay Cities Council of Governments have prepared an EECAP (2015) to guide the City toward a more sustainable future. The EECAP's goal is to reduce the City's GHG emissions. The City's EECAP serves as a guide for action by setting GHG emission reduction goals and establishing strategies and policy to achieve desired outcomes over the next 20 years. The EECAP outlines various municipal measures that encourage reductions in the following categories: land use and transportation, energy efficiency, solid waste, urban greening, and energy generation and storage. The City's EECAP maintains the reduction targets established in the EECAP.

TABLE 4.8-1: 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 percent 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.

TABLE 4.8-1: DESCRIPTION OF GREENHOUSE GASES	
Greenhouse Gas	**Description**
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 percent 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.
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: USEPA, *Overview of Greenhouse Gases*, April 11, 2018 (https://www.epa.gov/ghgemissions/overview-greenhouse-gases); USEPA, *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; USEPA, *Methane and Nitrous Oxide*	

Impact Analysis

4.8a 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 Greenhouse Gas Emissions

The proposed Project would generate greenhouse gas (GHG) emissions directly from construction-related activities. **Table 4.8-2: Construction-Related Greenhouse Gas Emissions** provides the approximate daily GHG emissions generated by construction equipment utilized to build the proposed Project. As indicated in **Table 4.8-2**, Project construction-related activities would generate approximately 760 $MTCO_2e$[34] of GHG emissions over the course of construction. Construction GHG emissions are typically summed and amortized over the Project's lifetime (assumed to be 30 years), then added to the operational emissions.[35] The amortized Project emissions would be 25.35 $MTCO_2e$ per year. Once construction is complete, the generation of construction-related GHG emissions would cease.

[34] Metric tons of carbon dioxide equivalent or MTCO2e is the unit of measurement used. The unit "CO2e" represents an amount of a GHG whose atmospheric impact has been standardized to that of one-unit mass of carbon dioxide (CO2), based on the gas' global warming potential (GWP). Tool formulas convert standard metrics for electricity, green energy, fuel use, chemical use, water use, and materials management into MTCO2e.

[35] The Project lifetime is based on SCAQMD's standard 30-year assumption (South Coast Air Quality Management District, Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13, August 26, 2009).

TABLE 4.8-2: CONSTRUCTION-RELATED GREENHOUSE GAS EMISSIONS	
Category	**$MTCO_2e$**
Year 1 Construction Emissions (2020)	164.10
Year 2 Construction Emissions (2021)	596.34
Total Construction Emissions	760.45
30-Year Amortized Construction	25.35
Source: CalEEMod version 2016.3.2; see **Appendix D** for model outputs.	

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions would occur over the proposed Project's life. 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. **Table 4.8-3: Project Greenhouse Gas Emissions** provides the Project's total operational GHG emissions and indicates they would total approximately 1,692.27 MTCO2e annually from both Project construction and operations, a net increase of 1,242.03 MTCO2e above existing operations.

Table 4.8-3: Project Greenhouse Gas Emissions	
Emissions Source	**$MTCO_2e$ per Year**
Existing Project Site	
Total Emissions	450.24
Proposed Project	
Construction Amortized Over 30 Years	25.35
Area Source	1.95
Energy	163.47
Mobile	1,177.18
Waste	21.31
Water and Wastewater	40.64
Total Emissions	**1,429.9**
Net Change	**979.66**
SCAQMD Project Threshold	3,000
Exceeds Threshold?	**No**
Source: CalEEMod version 2016.3.2; see **Appendix D** for model outputs.	

Table 4.8-3 indicates that most of the Project's emissions (approximately 94 percent) would be from energy and mobile sources. As noted above, energy and mobile sources are targeted by statewide measures such as continued implementation of the Renewable Portfolio Standard (the target is now set at 60 percent renewables by 2030) and extension of the Cap and Trade program (requires reductions from industrial sources, energy generation, and fossil fuels). The Cap and Trade program covers approximately 85 percent of California's GHG emissions as of January 2015. The statewide cap for GHG emissions from the capped sectors (i.e., electricity generation,

industrial sources, petroleum refining, and cement production) began in 2013 and will decline approximately three percent each year, achieving GHG emission reductions throughout the program's duration. The passage of AB 398 in July 2017 extended the Cap and Trade program's duration from 2020 to 2030.

Table 4.8-3 also indicates that the proposed Project would not exceed the SCAQMD's proposed GHG threshold of 3,000 MTCO2e per year.[36] In addition, with continued implementation of various statewide measures, the Project's operational energy and mobile source emissions (approximately 94 percent of total Project emission) would continue to decline in the future. Project-related GHG emissions would be less than significant, and no mitigation is required.

4.8b 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. See **Appendix D** for a detailed discussion concerning GHG-related plans, policies, and regulations.

In 2015, the City adopted the EECAP to improve energy efficiency and reduce GHG emissions. The City also adopted a CAP in 2017. To develop this EECAP, a GHG emissions inventory was conducted to determine baseline GHG 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. The 2017 CAP uses the same inventories and reduction targets. 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 and CAP. 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 efficiency measures mandated by the 2019 Building Energy Efficiency Standards. Because CCR Title 24, Part 6 standards require energy efficiency 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 2019 Building Energy Efficiency Standards improved upon the 2016 Standards for new construction of, and additions and alterations to, residential, commercial, and industrial buildings.

[36] On September 28, 2010, air quality experts serving on the SCAQMD GHG CEQA Significance Threshold Stakeholder Working Group recommended an interim screening level numeric bright-line threshold of 3,000 metric tons of CO2e annually. The Working Group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, various city and county planning departments. The numeric bright line and efficiency-based thresholds, which were developed for consistency with CEQA requirements for developing significance thresholds, are supported by substantial evidence and provide guidance to CEQA practitioners and lead agencies for determining whether GHG emissions from a proposed project are significant.

The Project proposes to incorporate energy efficient design features in compliance with the 2019 Building Energy Efficiency Standards and CALGreen that are consistent with the EECAP's efficiency measures. Additionally, the Project is an infill development within an urbanized area and would generate GHG emissions (1,692.27 MTCO2e per year) well below SCAQMD thresholds.

As noted above, approximately 94 percent of the Project's emissions would be from energy and mobile sources, although, these emissions estimates are conservative based on the factors outlined below. It is noted that the City has no control over vehicle emissions (approximately 78 percent of the Project's total emissions).

- The Project would result in 818 ADT,[37] which is a conservative estimate given trip credits for the existing land uses that would be displaced have not been applied. When trip credits for the existing commercial, automotive repair, and taxi service uses are applied to the Project's trip generation estimates, the Project's net new trips would be offset, with proportionate offsets in mobile source emissions. Notwithstanding, for a conservative approach, this analysis assumes a traffic increase of 818 ADT.

  Project emissions would be further reduced by implementation of the 2017 CARB Scoping Plan measures. These emissions would decline in the future due to statewide measures including the reduction in fuels' carbon content, CARB's advanced clean car program, CARB's mobile source strategy, fuel efficiency standards, cleaner technology, and fleet turnover. SCAG's 2016 RTP/SCS is also expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035.[38] The Project is an infill development near large employment centers, thereby potentially reducing the need to travel long distances for some residents and reducing associated GHG emissions.[39]

Concerning Executive Order S-3-05's 2050 goals, it is presently not possible to quantify the emissions savings from future regulatory measures, as they have not yet been defined. Nevertheless, it can be anticipated that Project operations would be subject to compliance with all applicable measures that State lawmakers have enacted and that would lead to an 80 percent reduction below 1990 levels by 2050 for compliance with Executive Order.

The proposed Project demonstrates consistency with EECAP/CAP goals, measures, and emission reduction targets and would not conflict with any applicable plan, policy, or regulation of an agency adopted to reduce GHG emissions, including Title 24, AB 32, and SB 32. Therefore, Project impacts would be less than significant.

Cumulative Setting

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants

[37] **Appendix H3: Transportation Memo.**

[38] Southern California Association of Governments, *Final 2016–2040 RTP/SCS*, April 2016, p. 153.

[39] The California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures* (August 2010) identifies that infill developments, such as the proposed Project reduce VMT, which reduces fuel consumption. Infill projects such as the proposed Project would have an improved location efficiency.

with localized air quality effects have relatively short atmospheric lifetimes (approximately one day), GHGs have much longer atmospheric lifetimes of one year to several thousand years that allow them to be dispersed around the globe.

Cumulative Impacts and Mitigation Measures

It is generally the case that an individual project of the proposed Project's scale and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHG emissions would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the proposed Project, as well as other cumulative related projects, would be subject to all applicable regulatory requirements, which would further reduce GHG emissions. As indicated in **Table 4.8-3**, the proposed Project's GHG emissions would be less than significant. Additionally, as discussed above, the Project would be consistent with the City's EECAP and CAP. As a result, the Project would not conflict with any GHG reduction plan. Therefore, the Project's cumulative contribution of GHG emissions would be less than significant and the Project's cumulative GHG impacts would also be less than cumulatively considerable.

4.9 Hazards and Hazardous Materials

This Section is based on the following documentation:

- Phase I Environmental Site Assessment Report and Supplemental Subsurface Investigation (Phase I ESA) (Ramboll US Corporation, March 2019); see **Appendix E1**
- Final Response Plan (Ramboll US Corporation, May 21, 2020); see **Appendix E2**
- CEQA Hazards Section (Ramboll US Corporation, February 18, 2020);[40]
- Technical Memorandum: Application of Screening Levels in Relation to Revised Development Plan (Ramboll US Corporation, May 5, 2020); see **Appendix E3**
- Approval of Response Plan for Rosecrans Place (DTSC Approval) (DTSC, May 2020); see **Appendix E4**
- **Approval of PCB Cleanup Plan for Rosecrans Place (USEPA Approval) (USEPA, May 2020); see Appendix E5**

[40] L. Rebele, Personal Communication – Email. February 18, 2020.

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 or excessive noise for people residing or working in the project area?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X
Source: Kimley-Horn & Associates				

Summary of Phase I and Phase II Environmental Site Assessments

Property Background

Based on the review of state and federal agency listings, the Project site is listed on the Department of Toxic Substances Control (DTSC) Voluntary Cleanup Program database. Low-risk properties listed on this database are focused on protecting human health and the environment, and facilitating a site's redevelopment back to productive use. A voluntary clean-up program for the site was initiated with DTSC on May 22, 2019, pursuant to the California Land Reuse and Revitalization Act of 2004 (CLRRA).

The DTSC EnviroStor database listing notes that the Project site is approximately 5.47 acres in size and is in a mixed commercial and industrial area.[41] Historical aerial photographs indicate the Project site was part of a larger area used for agricultural purposes from the 1920s to the early 1950s. In the 1960s and 1970s, the Project site's western portion was used for automobile storage and automobile parts salvage, while the site's eastern portion was used for metal salvage. Metal salvage appeared site-wide by the late 1970s and early 1980s. The office building was constructed by 1976. The remaining on-site building and attached building appeared in 1988 and 1989. The Project site use changed from automobile parts salvage to taxi services in the late 1980s and early 1990s.

Previous Subsurface Investigations and Remediation

Various investigation and remedial efforts have been performed at the Project site at various times between 1992 and 2020. These studies include the following:

- Chemical Waste Management, Inc, ENRAC Division. 1992. "Cal-State Metals Contaminated Soil Removal Project Final Report."
- Environmental Support Technologies Incorporated. 2005. "Underground Storage Tank Removal and Closure Report." May 13.
- Fulcrum Resources Environmental. 2017. "Phase II Subsurface Investigation at 2101 & 2129 West Rosecrans Avenue, Gardena, California" December 11.
- Fulcrum Resources Environmental. 2018 "Supplemental Phase II Subsurface Investigation at 2101 & 2129 West Rosecrans Avenue, Gardena, California." December 24.
- Ramboll. 2019a. "Phase I Environmental Site Assessment and Supplemental Subsurface Investigation 2101 and 2109 West Rosecrans Avenue, Gardena, California." March.
- Ramboll. 2019b. "Site Assessment Report 2101 and 2109 West Rosecrans Avenue, Gardena, California." April.
- Ramboll. 2019c. "Revised Supplemental Site Investigation Work Plan 2101 and 2109 West Rosecrans Avenue, Gardena, California." October.
- Ramboll. 2019d. "Supplemental Site Investigation Report" 2101 and 2109 West Rosecrans Avenue, Gardena, California." November.
- Ramboll. 2019e. "Soil Management Plan 2101 and 2109 West Rosecrans Avenue, Gardena, California." December.
- Ramboll. 2020a. "Amended Supplemental Site Investigation Report 2101 and 2109 West Rosecrans Avenue, Gardena, California." March.
- Ramboll. 2020b. "Final Response Plan 2101 and 2109 West Rosecrans Avenue, Gardena, California." May.

[41] Department of Toxic Substance Control. (2018). *EnviroStor Database.* Retrieved from: https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id+60002809.

These remedial and assessment activities are summarized below for soils, soil vapor, and groundwater.

Ramboll and other consultants have conducted several onsite subsurface investigations. The subsurface investigations have revealed the presence of elevated polychlorinated biphenyls (PCBs), metals, and total petroleum hydrocarbons (TPH) in shallow soil (primarily shallower than 5.0 feet below ground surface (bgs)) at concentrations exceeding applicable United States Environmental Protection Agency/Department of Toxic Substances Control (USEPA/DTSC) commercial screening levels. The DTSC approved commercial screening levels are provided in Appendix E3.[42] The presence of PCB-, metal-, and TPH-impacted soil at the site is attributed to the historical activities associated with automobile storage and automobile/metal salvage. The general site-wide and shallow distribution of PCB-, metal- and TPH-impacted soil at the site is consistent with sporadic and incidental releases over time and not with defined large episodic spills or ongoing leaks. Much of the site's shallow impacted soil is not associated with a specific source or sources but is consistent with the locations of the salvage operations' historical footprint. The DTSC-approved clean-up mitigation for shallow soils at the Project site is excavation with off-site disposal. The maximum anticipated excavation depth, based on sampling data collected to date, is approximately 5.0 feet bgs. Impacted soils identified as exceeding screening levels would be segregated, managed in temporarily stockpiles with appropriate cover, profiled, and transported to a licensed disposal facility. The proposed clean-up mitigation is presented in the Final Response Plan, which was approved by DTSC on May 19, 2020; see **Appendix E4**.

Subsurface investigations conducted at the Project site have also revealed the presence of volatile organic compounds (VOCs) in soil vapor – at concentrations exceeding USEPA/DTSC screening levels throughout several portions of the site. The most common VOCs detected at elevated levels exceeding regulatory screening levels include tetrachloroethene (PCE), trichloroethene (TCE), 1,1-dichloroethane (1,1-DCA) and vinyl chloride. The concentrations of VOCs in soil vapor generally appear to increase with increasing depth. The majority of the VOCs identified through soil vapor sampling are not indicative of a surface release, and are likely the result of off-gassing from impacted groundwater encountered at approximately 25 feet bgs and flowing under the site from off-site VOC-impacted properties located upgradient to the north.

Subsurface investigations conducted at the Project site have also revealed the presence of VOCs and TPH in groundwater – at concentrations exceeding applicable USEPA/DTSC screening levels. The most common VOCs detected at elevated levels include PCE, TCE, and 1,1-DCA. Ramboll recently installed a groundwater monitoring well network at the Project site to verify the groundwater flow direction and distribution of chemicals in groundwater, as requested by the DTSC. The monitoring well network will be monitored on a DTSC-approved basis and continued

[42] DTSC and EPA approved the use of commercial screening levels for the project with the conditions that 1) the proposed buildings do not have back yards where soils are exposed (i.e., all backyards and sideyards are concrete paved), 2) clean import soil is used for the common areas to a depth of 2 feet, and 3) a land use covenant is filed with the County restricting the property and formally documenting that concentrations of contaminants remain at the Site above residential screening levels (and for PCBs, concentrations above 1.0 mg/kg).

to be evaluated over time. The source of most of the VOCs identified in groundwater is located off-site and hydrologically upgradient and north of the Project site.

DTSC Notice of Exemption

The Final Response Plan, which was approved by DTSC on May 19, 2020, describes in detail the site investigations, results, and proposed activities to address soil contamination and soil vapor mitigation; see also Response 4.9b below. The Final Response Plan activities would be implemented such that they minimize impacts to human health and the environment. DTSC concluded the proposed Response Plan activities would not have a significant negative effect on human health and the environment; therefore, DTSC prepared a Notice of Exemption (NOE) under CEQA. DTSC held a public comment period from March 30, 2020 to April 29, 2020. DTSC evaluated the comments received during the public comment period and determined that revisions to the Response Plan and the NOE were not required; see **Appendix E4**.

EPA Approval

The EPA will oversee remediation of PCBs at the Project site, which is under federal jurisdiction. Additionally, the EPA reviewed the Final Response Plan and approved the specified remediation methods. The EPA included a land use restriction to prevent disturbance of potentially contaminated soils during Project operations, in compliance with the Soil Management Plan. The EPA approval letter is included in **Appendix E5**.

Impact Analysis

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

Less Than Significant Impact. Project construction and operation would involve the transport, storage, use and/or disposal of limited quantities of hazardous materials, such as fuels, solvents, degreasers and paints. The use of these materials during Project construction would be short-term and would occur in accordance with standard construction practices, as well as with applicable federal, state, and local regulations. Potentially hazardous materials would be contained, stored, and used during construction in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Examples of such activities include fueling and servicing construction equipment, and applying paints and other coatings. Project construction would be temporary, and on-site activities would be governed by existing regulations of several agencies. Construction activities would be subject to compliance with relevant regulatory requirements and restrictions concerning the transport, use, or disposal to prevent a significant hazard to the public or environment. The primary regulatory requirements include South Coast Air Quality Management District Rules 1166 (volatile organic compound emissions) and 1466 (fugitive dust-toxic air contaminants).

The Project proposes a mixed-use development with 113 DU, including 15 live-work DU with 3,949 SF of workspace. The hazardous materials used during operations would be stored, handled, and disposed of in accordance with applicable regulations. These uses would not involve the routine transport, use, or disposal of quantities of hazardous materials that may create a

significant hazard to the public or environment. The proposed Project would also be reviewed by LACFD for hazardous material use, safe handling and storage, as appropriate. LACFD would impose COAs upon the Project to reduce hazardous material impacts. Therefore, following compliance with the regulatory requirements and COAs, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant in this regard, and no mitigation is required.

4.9b Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. As discussed above, the Project site's western portion was used for automobile storage and automobile parts salvage, while the site's eastern portion was used for metal salvage. Metal salvage appeared across the entirety of the Project site by the late 1970s and early 1980s. The presence of PCB-, metal-, and TPH-impacted soil at the Project site is attributed to the historical activities associated with automobile storage and automobile/metal salvage.

Project construction would include demolition of all structures and complete over-excavation and re-compaction of soils to a depth of 5.0 feet bgs for geotechnical purposes. In accordance with the Response Plan, contaminated soil identified as exceeding screening levels would be excavated, segregated, managed in temporarily stockpiled with appropriate cover, profiled, and transported to a licensed disposal facility. Dust generated during grading/excavation operations would be managed by the grading contractor in accordance with SCAQMD Rule 403. Given the described metal and TPH impacted soil and the proposed excavation, transport, and offsite disposal, South Coast AQMD Rules 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) and 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants) would also apply. The Project would be subject to compliance with a DTSC-approved Final Response Plan, which the City would impose on the Project pursuant to a COA. The Response Plan would treat or dispose of all contaminated onsite soils -site with DTSC oversight and avoid a significant hazard to the public or environment. Prior to Grading Permit issuance, the DTSC-approved Final Response Plan would address soil contamination and soil vapor hazards; see **Appendix E2**. Contaminated soil identified as exceeding screening levels for commercial use (as noted in **Appendix E3** and approved by DTSC (see **Appendix E4)**) would be excavated, segregated, managed in temporary stockpiles with appropriate cover, profiled, and transported to a licensed disposal facility. Additionally, all on-site structures would be designed and built to include Vapor Intrusion Mitigation System (VIMS). The VIMS would consist of a passive sub slab depressurization system (SSD) coupled with a vapor barrier system, which would be installed under the proposed buildings. If conditions warrant and as determined by DTSC, the SSD system would be converted to an active system (i.e., a soil vapor monitoring well network), which would actively remove vapors from beneath the structures' footprints and conduct ongoing monitoring during Project operations. In addition, a groundwater monitoring system would be installed to evaluate and monitor the site's groundwater conditions over time. The

remediation/measures described above would be implemented with DTSC oversight. With implementation of the specified remediation, no significant impacts related to on-site contamination would occur during Project construction and operations.

Pursuant to a City-imposed COA concerning Site Plan restrictions, a land use covenant would be recorded with the Los Angeles County Recorder prior to Building Permit issuance restricting certain activities at the site (e.g., installation of drinking water wells, use of the site as a daycare, etc.) and recording the location and extent of any left "in place" impacted soils. Additionally, all DU would be required to have concrete back yards and side yards where no concrete removal would be permitted (thereby avoiding disturbance of or exposure to soil beneath the hardscapes). Greenspace areas would require a 2.0-foot layer of clean imported fill material, following removal of any impacted soils.

Asbestos-containing materials (ACMs) and lead-based paint (LBP) are present in some of the building materials found in the existing on-site buildings. Any activity that involves cutting, grinding, or drilling during building demolition, or that involves relocation of underground utilities, could release friable asbestos fibers unless proper precautions are taken. The federal Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by SCAQMD under its Rule 1403. The federal OSHA also regulates asbestos as a potential worker safety hazard. All hazardous building materials, including asbestos, lead-based paint and universal wastes, would be abated in accordance with SCAQMD rules and in accordance with all applicable laws, including guidelines from OSHA. A formal asbestos and lead-based paint abatement program would be required prior to demolition activities. The demolition contractor would be required to make appropriate notifications to the SCAQMD and obtain any required permits prior to commencing with abatement and demolition activities. Following compliance with the established regulatory framework, impacts concerning ACMs and LBPs would be reduced to less than significant.

The Project proposes a mixed-use development with 113 DU, including 15 live-work DU with 3,949 SF of work space. It is assumed that use, storage, and transport of routinely-used hazardous materials would occur in compliance with the established regulatory framework. . Therefore, it is not anticipated that Project operations would create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Mitigation Measures

No mitigation is required.

4.9c Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The Project site is within 0.25 mile of Alta Vista Innovation High School, located at 2401 Rosecrans Avenue in Gardena. Additionally, the Project site is just beyond 0.25 mile of Junípero Serra High School, located at 14830 Van Ness Avenue in Gardena. Notwithstanding the Project site's proximity to these existing schools, any potentially hazardous

onsite soil conditions would be remediated and ACMs and LBPs removed pursuant to the DTSC-approved Response Plan and all applicable laws and air quality protection regulations (e.g. SCAQMD Rule 1166 and 1466).

In addition, while the Project could involve the use of small quantities of potentially hazardous materials such as fuels, solvents, degreasers and paints during construction, and small amounts of commercially available janitorial and landscaping supplies during operation, such materials would not be used in quantities sufficient to cause a potential hazard to nearby schools.

The limited quantities of hazardous materials, as described above, are not expected to pose a risk to the nearby schools. Further, occupancy of the proposed residential uses would not cause hazardous substance emissions or generate hazardous waste. Therefore, the impact would be less than significant in this regard, and no mitigation is required.

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

Less Than Significant Impact. Government Code §65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the DTSC. The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination, sites with known 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.

A regulatory agency database search was conducted as part of the Phase I ESA; see Appendix D of **Appendix E1**. The two Cortese sites that were identified in the database search are located offsite.

As discussed previously, the Project site is listed on the VCP regulatory database for a cleanup agreement with DTSC. The site is also listed on the Los Angeles County Hazardous Materials System, Underground Storage Tank, HAZNET, RCRA-Non Generator, SWEEPS UST, emissions EMI, and FINDS databases. The information from these databases includes lists of properties that contain businesses that handle hazardous materials and/or wastes with no records of releases, properties with relatively minor incidents having little to no threat to human health or the environment, or properties with a history of extensive releases that require remediation efforts to achieve acceptable level conditions. As described in **Appendix E2**, the environmental database review showed active DTSC oversight and a low-risk modifier associated with the site. The Project site is subject to remediation under a Response Plan approved by DTSC, which would treat or dispose of contaminated soils on-site with DTSC oversight and prevent a significant hazard to the public or environment; see Response 4.9b. The extensive Response Plan remediation measures described above would be implemented on-site with DTSC and USEPA oversight. Therefore, following removal and abatement of the contaminated soils, and compliance with the above regulatory requirements and City-imposed COA to ensure compliance with the DTSC-approved Response Plan, impacts would be less than significant.

4.9e For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Less Than Significant Impact. The airport located nearest the Project site is Hawthorne Municipal Airport/Jack Northrop Field ("Airport"), approximately 1.57 miles to the northwest. The Airport's Airport Influence Area Map depicts the Airport's influence area and 65 and 70 CNEL noise contours. As shown on the Airport Influence Area Map, the Project site is not within the Airport's influence area or noise contours. Therefore, the Project would not result in an airport-related safety hazard or excessive noise for people residing or working in the Project area. Therefore, impacts would be less than significant in this regard, and no mitigation is required.

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

Less Than Significant Impact. The Project Site is in an area where adequate circulation and access is provided to facilitate emergency response. The nearest emergency route is Interstate 110, approximately 0.07 miles east of the Project Site.[43] Construction activities are expected to be primarily contained within the Project site boundaries. However, it is expected that construction fences may encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project site. Temporary traffic controls would be provided to direct traffic around any closures as required as imposed through a COA. Project would be subject to Gardena Public Works requirements for any work done in the ROW, including street closures or flag monitors. Travel lanes would be maintained in each direction on West Rosecrans Avenue throughout the construction period, and emergency access would not be impeded.

The proposed building configuration would be subject to compliance with applicable fire codes, including proper emergency exits for residents and patrons; see Response 4.15a. As such, Project implementation would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant.

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

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

[43] County of Los Angeles Department of Public Works, Disaster Route Maps (by City), City of Gardena, June 25, 2006.

4.10 Hydrology and Water Quality

This Section is based on the Preliminary Hydrology Study (C&V Consulting Inc., April 2020) (Hydrology Study), which is included in its entirety in **Appendix F1: Preliminary Hydrology Study**, and the Preliminary Low Impact Development (LID) Plan (C&V Consulting Inc., April 2020) (LID Plan), which is included in its entirety in **Appendix F2: Preliminary Low Impact Development Plan.** The City of Gardena Building Official preliminarily reviewed and approved the Hydrology Study and LID.[44]

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site.			X	
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			X	
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) Impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	
Source: Kimley-Horn & Associates				

[44] City of Gardena. (November 2019). *Building Division Preliminary Review of Stormwater and Hydrology*. Gardena, CA: Mark Handler, Building Official.

Impact Analysis

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

Less Than Significant Impact.

Water Quality Standards/Waste Discharge Requirements - 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 the Construction 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 5.47 gross-acres, thus, would be subject to the Construction General Permit. To obtain coverage under the Construction 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 Construction General Permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the Construction 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. The types of required BMPs 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. GMC Chapter 8.70: *Stormwater and Runoff Pollution Control*, 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: *Development Construction*, specifies that no Grading Permit would be issued to construction projects that disturb 1.0 or more acres of soil without obtaining a *General Construction Activity Stormwater Permit* (GCASWP) from the State Water Resources Control Board.

Following compliance with NPDES and GMC requirements, which includes implementation of BMPs as a COA, the Project's construction-related activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

Water Quality Standards/Waste Discharge Requirements - Long-Term Operations

The Los Angeles County Flood Control District (LACFCD), the County of Los Angeles, and the City of Gardena along with 83 other incorporated cities therein (Permittees) discharge pollutants from their municipal separate storm sewer (drain) systems (MS4s). Stormwater and non-stormwater enter and are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge

requirements contained in Order No. R4-2012-0175[45] (NPDES Permit No. CAS004001), *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, Except Discharges Originating from the City of Long Beach MS4*, which was adopted November 8, 2012.[46] The MS4 Permit Order provides the revised waste discharge requirements for MS4 discharges within the Los Angeles County watersheds, which includes Gardena. The MS4 Permit Order, which became effective December 28, 2012, supersedes Order No. 01-182. Los Angeles County uses its Low Impact Development (LID) Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements.

The MS4 Permit Order requires development and implementation of a Planning and Land Development Program for all "New Development" and "Redevelopment" projects subject to the Order. 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 5.47 gross-acres of disturbed area and would replace 10,000 SF or more of impervious surface area; as such, the Project is subject to Los Angeles County's LID Ordinance. Additionally, GMC §8.70.110.B.2: *Standard Urban Stormwater Mitigation*, 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 following is a list of materials anticipated during Project operations, which would potentially contribute to pollutants, other than sediment, to stormwater runoff.

- Vehicle fluids, including oil, grease, petroleum, and coolants from personal vehicles;
- Landscaping materials and wastes (topsoil, plant materials, herbicides, fertilizers, mulch, pesticides);
- General trash debris and litter; and
- Pet waste (bacteria/ fecal coliforms).

[45] State of California Water Quality Control Board. (undated). *Order No. R4-2012-0175 NPDES Permit NO. CAS004001*. Los Angeles, CA: State of California Water Quality Control Board.

[46] Ibid.

The Project proposes Site Design concepts intended to achieve the following:

- Minimize Urban Runoff,
- Minimize Impervious Footprint,
- Conserve Natural Areas, and
- Minimize Directly Connected Impervious Areas (DCIAs).

Infiltration is Los Angeles County's first option 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 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 Project's LID Plan, the Project site's 85-percentile rain event is 0.95 inches, which is used as the design storm for LID.

The Project's LID Plan identifies the following main objectives:

1. Determination of the peak stormwater runoff discharge rate.
2. Conserve natural and landscaped areas.
3. Minimize stormwater pollutants of concern.
4. Protect slopes and channels.
5. Provide storm drain system stenciling and signage.
6. Provide proof of ongoing BMP maintenance.
7. Design standards for structural or treatment control BMPs.

Refer to Response 4.10.c.ii for a description of existing and proposed site drainage. **Appendix F2** Table-2: Source Control BMPs, identifies the Project's proposed Non-Structural BMPs. The source control and treatment BMPs and how each would be implemented to achieve the site design concept are detailed in **Appendix F2** Table 2. Non-structural BMPs, which consist of educating employees and occupants, developing and implementing HOA guidelines, implementing BMPs and enforcing GMC requirements are also proposed. The Project's proposed structural BMPs are summarized **Appendix F2** Table-1: Design BMPs, and **Appendix F2** Table-3: Stormwater Quality Control BMPs.

The Preliminary LID Plan divides the Project site into four District Metered Areas (DMAs). Based on the 85th percentile 24-hr rain event, the Project would generate 0.0494 acre feet (af) from DMA 1, 0.1938 af from DMA 2, 0.0668 af from DMA 3, and 0.027 af from DMA 4, resulting in a total runoff of 0.337 af over a 24-hour period.[47] The Preliminary LID Plan concluded that

[47] The LID Plan Volume and Flow Rate Calculations and Hydrologic Report (Appendix A of **Appendix F2**) was based on an earlier site plan and used a prior estimate of 88 percent impervious area for the Project. Based on the current site plan (see

infiltration would not be feasible, given the Project site is interlayered. Instead, the Preliminary LID Plan proposes to treat the Project's stormwater runoff (approximately 1.049 cubic feet per second (cfs) (2.08 af per 24-hr) based on the 85th percentile 24-hr rain event) through an onsite Modular Wetland Systems (MWS). Stormwater runoff would be collected and treated by flowing through proposed MWS Biofiltration Vaults with a total treatment capacity of approximately 2.078 cfs.

Drainage from rooftops and landscape areas would be collected through area drains and entered the proposed catch basins. All curb inlet catch basins would be equipped with trash racks for pretreatment and Divert System to divert low flows to proposed MWS Biofiltration Vaults for water quality treatment.

Roof gutters would discharge to landscape areas using splash blocks when possible creating a passive bio treatment in small planter areas prior to interception by an area drain system, catch basin, and storm drain system. All runoff from the site would be tributary to the proposed onsite MWS.

Following compliance with NPDES requirements (i.e., Los Angeles County's LID Ordinance and GMC), which include LID BMPs, Project operations would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, impacts would be less than significant in this regard, and no mitigation is required.

4.10b Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The Project site is in Golden State Water Company's (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 Coastal Plain of Los Angeles Groundwater Basin's Central Sub-basin (Central Basin), and 12 active GSWC-owned wells in the Coastal Plain of Los Angeles Groundwater Basin's West Coast Sub-basin (West Coast Basin). Groundwater pumping for the Southwest System in 2015 totaled 5,915 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 gallons per capita per day (GPCD). Both the Central and West Coast Basins are adjudicated, thus, are subject to a maximum allowed pumping allocation for groundwater extraction across the entire basins. Refer to Response 4.10e concerning sustainable groundwater management.

Basin recharge occurs through percolation of precipitation and artificial recharge activities at spreading grounds, among other sources. The Project site was previously developed. Project

Exhibit 2-3: Conceptual Site Plan), the Project proposes 86 percent impervious area and would therefore generate slightly less stormwater runoff than estimated in the LID Plan.

implementation would increase the site's effective impervious area, as compared to pre-Project conditions, from 3.83 acres (70 percent) to 4.68 acres (86 percent). Thus, the Project would increase impervious area by approximately 0.85 acres, which would slightly reduce the surface area available for groundwater recharge through percolation. As concluded in Response 4.10e, the Project's water demand would total approximately 26,187 GPCD or 29.33 acre-feet per year (AFY). GSWC maintains an allocation of 16,439 AFY from the Central Basin and 7,502 AFY from the West Coast Basin. GSWC confirmed that water service is available to the Project site from GSWC's Southwest District water system.[48] 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 West Coast Basin groundwater supplies. The Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede the basins' sustainable groundwater management. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

4.10c Would the project substantially alter the existing drainage pattern of the site or area, including through the alterations of the course of stream or river or through the addition of impervious surfaces, in a manner which would:

(i) Result in substantial erosion or siltation on- or off-site?

(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

(iv) Impede or redirect flood flows?

Less Than Significant Impact. In the current condition, the Project site is generally divided into two drainage areas; see **Appendix F1** Existing Conditions Preliminary Hydrology Map. An approximately 1.6-acre undeveloped area (dirt lot) is on the site's southeastern corner. The dirt lot's existing drainage pattern is sheet flow. In the Project site's developed area that contains the existing taxicab depot, the existing drainage system conveys stormwater to the south via V-gutters. These V-gutters drain to a grate drop inlet, which drains into the street gutter through three curb cores at the site's southern portion near Rosecrans Avenue. Flows from the site onto Rosecrans Avenue then proceed west into a County of Los Angeles owned and maintained catch basin located approximately 250 feet west of the Project site along Rosecrans Avenue. From this catch basin, runoff then enters a LACFCD-owned 9'- 6" x 7'-0" RCP storm system (Project No. 11) (per LACFCD As-Built No. 181-11-D1.4), which continues along Rosecrans Avenue. This storm drain system ultimately outlets onto the Dominguez Channel, a Los Angeles County Flood Control Facility. Dominguez Channel flows then proceed in a southwesterly direction and eventually outlet into the Dominguez Channel Estuary and the Pacific Ocean.

[48] J. Zhao, P.E., PhD., Personal Communication – Will Serve Letter, September 20, 2019.

The Hydrology Study was prepared to determine the amount of stormwater runoff generated from the Project site in the existing and proposed conditions. The Hydrology Study was also prepared to determine whether detention basins would be required by comparing the proposed and existing conditions peak flow rates for the 2, 25, 50 and 100-year peak storm events.

The Project was analyzed using the Los Angeles County Department of Public Works Hydrology Manual 2006. The initial subarea was analyzed for acreage, land-use, soil type, peak flow rate and time of concentration according to the Rational Method described in the manual.

In the Hydrology Study the impervious area percentage values were a conservative estimate of the preliminary site design. During final engineering, impervious areas would be calculated in greater detail to refine all peak flow rates.

In accordance with the Los Angeles County Department of Public Works Hydrology Manual, all habitable structures must have a finished floor elevation to allow 1.0 feet of freeboard during the 100-year storm event and the drop inlet catch basin and onsite conveyance storm drain pipes must be sized to convey runoff from the 100-year storm event. Catch basin, pipe sizing and 100-year water surface elevation calculations would be provided during final engineering. Additionally, confluence analysis and travel time considerations would be incorporated in the calculations during final engineering to reflect more accurate peak flow rate values.

Appendix F1 Section 6.0 presents the hydrology summary for the existing and proposed conditions for each tributary. The percent difference (deltas) for all concentration times, which are for the 100-year storm event, are shown in **Table 4.10-1: Hydrology Summary**.

TABLE 4.10-1: HYDROLOGY SUMMARY

Storm	Existing Condition Peak Flow Rate	Proposed Condition Peak Flow Rate	Percent Difference (Delta)
25-year	9.35 cfs[1]	11.78 cfs	+25 percent
50-year	11.35 cfs	14.29 cfs	+25.9 percent
100-year	13.58 cfs	16.85 cfs	+24.1 percent

Notes:
1. cfs = cubic feet per second

The results from the Hydrology Study utilizing HydroCalc software provided by Los Angeles County Department of Public Works demonstrate that the proposed stormwater peak flow from the Project site would be generally higher than the existing condition peak flow, as indicated in **Table 4.10-1**; see also **Appendix F1,** Section 6. The proposed condition peak flow rate would be higher primarily because the Project would increase the site's impervious area causing higher runoff flow rates and higher concentration times. As noted above, the preliminary estimates of the impervious area would be verified for both the existing and proposed conditions during final engineering.

The Project proposes development of 113 DU, including 15 live-work units with 3,949 square feet of work space, over approximately 5.47 acres. The proposed development would include drive

aisles, parking, landscaping, walkways and common open space areas. The site would be graded to collect runoff at four low points to control the amount of imported fill during grading and reduce the need for retaining walls along the site's perimeter, while closely maintaining the entire site drainage area tributary to the existing LACFCD Project No. 11 storm drain. The proposed development would utilize onsite catch basins, biofiltration systems, and detention pipes to capture and treat stormwater. Stormwater would ultimately be conveyed by a proposed onsite underground storm drain piping system to the LACFCD 18-inch RCP BI 0432 – Line C storm drain located within Rosecrans Avenue.

In the proposed condition, the Project site would be divided into four drainage areas; see **Appendix F1** Proposed Conditions Preliminary Hydrology Map. Stormwater runoff would be conveyed via a proposed onsite gutter and directed to four sump areas, two equipped with curb inlet catch basins and the other two with a grate inlet catch basin, and a pass-by catch basin. The first curb inlet catch basin, located in Post Conditions Hydrology Map Area A3, would capture the stormwater from the site's lower-middle portion, while the other curb inlet catch basin, located in Post Conditions Hydrology Map Area A1, would capture most of the onsite stormwater from the site's northern residential portion. The grate inlet catch basin, in Post Conditions Hydrology Map Area A2, would capture flow from the Area A2 alley running north-south at the site's southwestern portion. The second grate inlet catch basin, in Post Conditions Hydrology Map Area A4, would capture the flow from the Post Conditions Hydrology Map Area A4 alley running north-south in the site's southeastern portion. A pass-by catch basin is proposed near the northern drive aisle in Post Conditions Hydrology Map Area A1 and an additional pass-by grate inlet type catch basin is proposed in the middle portion of Post Conditions Hydrology Map Area A1 to capture low-flow stormwater and reduce flows into the residential curb inlet catch basin.

All proposed onsite catch basins would be equipped with Modular Wetlands Dvert System to divert low flows to proposed MWS Biofiltration Vaults for water quality treatment. These Biofiltration Vaults would be equipped with an internal bypass system to convey larger storm event overflow conditions to on-site detention pipes. During larger storm events, stormwater runoff would be conveyed to the underground detention system where it would be released at LACFCD's allowed flow rate. The LACFCD has provided an allowable two-year storm peak runoff rate for discharge to the Dominguez Channel equal to 0.67 cfs per acre, or 3.66 cfs for the total site drainage area. Any flows in excess would be detained temporarily until they can be released. Since the Project's stormwater would ultimately be conveyed to the existing BI 0432 – Line C ultimately discharging into Dominguez Channel, the proposed peak flow rate compared to the allowable Q discharge rate would be verified with LACFCD at final engineering.

In the event the proposed onsite storm drain system is at its full capacity or clogged, stormwater would pond up at the proposed onsite sump areas and excess stormwater would top over grade break to continue to flow out towards Rosecrans Avenue where it would be intercepted by an offsite City-maintained catch basin.

During a heavy rainfall, the Project site's grading design would allow for multiple low points equipped with curb inlet catch basins throughout the entire Project site to accommodate smaller drainage areas to mitigate stormwater ponding in one spot. In an event of overflowing, the

proposed grading would facilitate the overflow by matching the historic drainage condition and for emergency overflow to continue to flow out towards Rosecrans Avenue, where it would be intercepted by an offsite City maintained catch basin. The proposed catch basins would be equipped with internal bypass systems to convey larger storm event overflow conditions. Given the Project's proposed increase in impervious surface area, the peak flow rate is also forecast to increase upon Project implementation. The peak flow runoff would be verified during final engineering based on the LACFCD Allowable Q Discharge Rate.

Additionally, there are no streams or rivers near the Project site. Therefore, the Project would not substantially alter the site's existing drainage pattern or add impervious surfaces, such that it would substantially increase the rate or amount of surface runoff in a manner which would result in flooding, create/contribute runoff, which would exceed the capacity of existing drainage system, or impede/redirect flood flows. Impacts would be less than significant in this regard, and no mitigation is required. Refer to Response 4.10a concerning potential impacts involving erosion.

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

Less Than Significant Impact. The Project site is in an area of minimal flood hazard.[49] 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 5.7 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. The Project proposes a mixed-use residential and commercial development that would involve the use of materials associated with routine property maintenance, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. The Project is not within a flood hazard, tsunami, or seiche zone and would not risk the release of pollutants. Therefore, potential impacts associated with inundation by flood hazard, tsunami, or seiche would be less than significant, and no mitigation is required.

4.10e Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Southwest System is supplied by two active, GSWC-owned wells in the Central Basin, and 12 active, GSWC-owned wells in the West Coast Basin. GSWC monitors well capacity, status, and water quality.

In 2014, the California Sustainable Groundwater Management Act (SGMA) was passed, which provides authority for agencies to develop and implement groundwater sustainability plans (GSP)

[49] Federal Emergency Management Agency. (April 2019). *FEMA Flood Map Service Center.* Retrieved from https://msc.fema.gov/portal/search?AddressQuery=1515%20W%20178th%20St%2C%20Gardena%2C%20CA%2090248#searchresultsanchor

or alternative plans that demonstrate water basins are being managed sustainably.[50] Under the SGMA, the Central Basin and West Coast Basin are exempted from the requirement to form a Groundwater Sustainability Agency since they are adjudicated basins.

The Central Basin adjudication limit (total of the allowed pumping allocations (APA) of each party) for groundwater extraction across the entire basin is 217,467 AFY. GSWC maintains an APA of 16,439 AFY. GSWC's APA is shared between all their systems that extract groundwater from the Central Basin. Three agencies, Los Angeles County Department of Public Works (LACDPW), Water Replenishment District of Southern California (WRDSC), and CBMWD, work with the water producers to ensure that the APA is available to the Central Basin's pumpers.

The West Coast Basin adjudication limit for groundwater extraction across the entire basin is 64,468 AFY. GSWC maintains legal rights to 7,502 AFY. Three agencies, LACDPW, WRDSC, and WBMWD, collaborate with the groundwater producers such as GSWC to ensure that the APA is available to be pumped from West Coast Basin wells.

GSWC currently operates 12 active wells in the Southwest System, 10 of which are in the West Coast Basin, and the remaining two are in the Central Basin. The Southwest System has a total normal year active well capacity of 10,865 gpm (17,525 AFY), of which 8,715 gpm (14,057 AFY) is in the West Coast Basin, and 2,150 gpm (3,468 AFY) is in the Central Basin.

Groundwater levels are managed within a safe basin operating range to protect the LA Basin's long-term sustainability and to protect against land subsidence. The Southwest System is supplied by two active, GSWC-owned wells in the Central Basin and 12 active, GSWC-owned wells in the West Coast Basin. The Central Basin's groundwater storage capacity is approximately 13.8 million AF. The storage capacity of the West Coast Basin's primary water producing aquifer, the Silverado aquifer, is estimated to be 6.5 million AF.

SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The latest basin prioritization project, SGMA 2019 Basin Prioritization, was completed in December 2019. SGMA 2019 Basin Prioritization identified 94 basins/sub-basins as medium or high priority. The Project site is in a low priority basin.[51] Additionally, the Southwest System's water use in 2015 (most recent UWMP) was 87 GPCD, well below the SBX7-7 2020 target of 121 GPCD. As discussed in detail in Response 4.11b, the Project proposes residential and live/work commercial land uses, which would be below the General Commercial with a MUO designations' maximum allowable intensity/density, with approximately 31 percent less population and proportionately less water demand. Further, the City would continue to comply with SBx7-7 requirements. Therefore, the Project would not

[50] State Water Resources Control Board. Sustainable Groundwater Management Act (SGMA). (April 2019). Retrieved from https://www.waterboards.ca.gov/water_issues/programs/gmp/sgma.html.

[51] California Department of Water Resources. (2020). *Basin Prioritization Dashboard*. Retrieved from: https://gis.water.ca.gov/app/bp-dashboard/final/.

conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less than significant in this regard, and no mitigation is required.

4.11 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) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	
Source: Kimley-Horn & Associates				

Impact Analysis

4.11a Would the project physically divide an established community?

No Impact. Examples of projects that could physically divide an established community include a new freeway or highway that traverse an established neighborhood. The Project proposes a mixed-use development consisting of 113 DU, including 57 attached townhouse units, 41 detached garden court units, and 15 live-work units with 3,949 SF of work space. The Project replaces existing commercial uses and does not propose any new streets or other physical barriers, which could physically divide an established community. Given its nature and scope, the Project would not physically divide an established community. Therefore, no impact would occur in this regard, and no mitigation is required.

4.11b Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

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 with a MUO.[52] The General Commercial designation provides for a wide range of larger-scale commercial uses to serve both the needs of the City and the region.[53] The MUO designation permits residential development on selected areas designated for commercial and industrial land uses.[54] The MUO designation's purpose is to allow greater flexibility of development alternatives, especially attractive higher density residential development in appropriate areas that are experiencing both physical and economic blight. The Project proposes a mixed-use development consisting of attached townhouse units, detached garden court units, and live-work units. Therefore, the Project proposes land uses consistent with the primary intended uses for the General Commercial

[52] City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006*. Figure LU-2: 2013 General Plan Land Use Policy Map. Gardena, CA: City of Gardena.

[53] City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006*. Page LU-12. Gardena, CA: City of Gardena.

[54] Ibid., Page LU-11.

with a MUO designations. Within the MUO designation, the maximum allowed intensity for non-residential uses is a FAR of 0.5 and the maximum allowed density (stepped density) for residential uses is 30 DU/AC for lots greater than 1.0 AC. Based on a 5.47-acre site, 0.5 FAR, and 30 DU/AC, the Project site's maximum general commercial development capacity is 119,137 SF and maximum residential development capacity is 164 DU. The Project proposes a mixed-use development consisting of 113 DU, including 15 live-work units with 3,949 SF of workspace. Therefore, the Project proposes residential and live/work commercial land uses, which would be below the General Commercial with a MUO designations' maximum allowable intensity/density. It is noted, the Project site was identified as a candidate site for affordable housing in Gardena's 5th Cycle Housing Element. Although the Project does not propose affordable housing, the City has sufficient land available to meet their 5th Cycle allocation. Therefore, the Project would not conflict with the GGP or cause a significant environmental impact due to a conflict.

The City of Gardena Zoning Map depicts the City's zones and indicates the Project site is zoned C-3 Zone with a MU Overlay Zone.[55] The C-3 Zone is intended for general commercial use. The MU Overlay Zone is intended to allow greater flexibility of development alternatives, especially attractive higher density residential development and live-work buildings, in appropriate areas of the city; see GMC Chapter 18.19. If a property is developed with a mix of residential and nonresidential uses within the same project area, then development is subject to GMC §18.19.030: *Uses Permitted*, and GMC §18.19.060: *Property Development Standards*. The Project proposes a mixed-use development consisting of 113 DU, including 15 live-work units with 3,949 SF of workspace, which are permitted within the MU Overlay Zone.

GMC §18.44.010: *When Required*, 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 Vesting Tentative Tract Map, as discussed below. The Site Plan would be approved (or conditionally approved), only after the City finds the proposed development's physical design would be consistent with the GGP's intent and general-purpose and GMC provisions. Project approval would also require compliance with GMC development standards. It is noted, the City is currently processing GMC revisions to development standards that are relevant to the proposed Project (e.g., concerning garage dimensions, setbacks, and open space). 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.

GMC §17.08.020: *Tentative Maps – Filing – Processing*, specifies that the subdivider shall prepare, or cause to be prepared, a tentative map for all proposed divisions of land or reversions to acreage and shall file such tentative map with the City. Such tentative map shall be processed in accordance with the Subdivision Map Act and the provisions of GMC Title 17: *Subdivision*. The Project proposes VTTM #82667 to create one residential lot for condominium purposes.

Therefore, following the City's approval of the requested entitlements (i.e., Vesting Tentative Tract Map VTTM #82667 and Site Plan Review SPR #11-18), the Project would not conflict with

[55] City of Gardena. (January 2018). *Zoning Map*. Gardena, CA: City of Gardena Planning Division.

the GMC or cause a significant environmental impact due to a conflict. Impacts would be less than significant in this regard, and no mitigation is required.

4.12 Mineral Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				X
Source: Kimley-Horn & Associates				

Impact Analysis

4.12a Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

4.12b Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The Surface Mining and Reclamation Act of 1975 (SMARA) requires classification of land into mineral resource zones (MRZs) according to the area's known or inferred mineral potential.[56] The Project site is not located in an area identified as a locally important mineral resource recovery site.[57] 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.

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

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

4.13 Noise

This Section is based on the *Acoustical Assessment* (Kimley-Horn & Associates, Inc., March 2020), which is included in its entirety in **Appendix G: Acoustical Assessment.**

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generate of excessive ground borne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	
Source: Kimley-Horn & Associates				

Sound and Environmental Noise

Acoustics is the science of sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a medium (e.g., air) to human (or animal) ear. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and are called sound. The number of pressure variations per second is called the frequency of sound and is expressed as cycles per second, or hertz (Hz).

Noise is defined as loud, unexpected, or annoying sound. In acoustics, the fundamental model consists of a noise source, a receptor, and the propagation path between the two. The loudness of the noise source, obstructions, or atmospheric factors affecting the propagation path, determine the perceived sound level and noise characteristics at the receptor. Acoustics deal primarily with the propagation and control of sound. A typical noise environment consists of a base of steady background noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These sources can vary from an occasional aircraft or train passing by to continuous noise from traffic on a major highway. Perceptions of sound and noise are highly subjective from person to person.

Measuring sound directly in terms of pressure would require a large range of numbers. To avoid this, the decibel (dB) scale was devised. The dB scale uses the hearing threshold of

20 micropascals (µPa) as a point of reference, defined as 0 dB. Other sound pressures are then compared to this reference pressure, and the logarithm is taken to keep the numbers in a practical range. The dB scale allows a million-fold increase in pressure to be expressed as 120 dB, and changes in levels correspond closely to human perception of relative loudness.

Noise Descriptors

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the noise's effect on people is largely dependent on the noise's total acoustical energy content, as well as the time when the noise occurs. The equivalent noise level (L_{eq}) is the average noise level averaged over the measurement period, while the day-night noise level (L_{dn}) and Community Equivalent Noise Level (CNEL) are measures of energy average during a 24-hour period, with dB weighted sound levels from 7:00 PM to 7:00 AM Most commonly, environmental sounds are described in terms of an average level (L_{eq}) that has the same acoustical energy as the summation of all the time-varying events.

A-Weighted Decibels

The perceived loudness of sounds is dependent on many factors, including sound pressure level and frequency content. However, within the usual range of environmental noise levels, perception of loudness is relatively predictable and can be approximated by dBA values. There is a strong correlation between dBA and the way the human ear perceives sound. For this reason, the dBA has become the standard tool of environmental noise assessment. All noise levels reported in this Section are in terms of dBA, but are expressed as dB, unless otherwise noted.

Addition of Decibels

The dB scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10. When the standard logarithmic dB is A-weighted, an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70-dBA sound is half as loud as an 80-dBA sound and twice as loud as a 60-dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3.0 dBA higher than one source under the same conditions. Under the dB scale, three sources of equal loudness together would produce an increase of 5.0 dBA.

Sound Propagation and Attenuation

Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6.0 dB for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern. Sound levels attenuate at a rate of approximately 3.0 dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics. No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft

surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. For line sources, an overall attenuation rate of 3.0 dB per doubling of distance is assumed.

Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by approximately 5.0 dBA, while a solid wall or berm reduces noise levels by 5.0 to 10 dBA. The way older homes in California were constructed and generally provide a reduction of exterior-to-interior noise levels of approximately 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more.

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted:

- Except in carefully controlled laboratory experiments, a 1.0-dBA change cannot be perceived by humans.
- Outside the laboratory, a 3.0-dBA change is considered a just-perceivable difference.
- A minimum 5.0-dBA change is required before any noticeable change in community response would be expected. A 5.0-dBA increase is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Hearing Loss

While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to

chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. The Occupational Safety and Health Administration has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over eight hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.

Annoyance

Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement concerning these different sources' relative annoyance. A noise level of approximately 55 dBA L_{dn} is the threshold at which a substantial percentage of people begin to report annoyance.

Existing Noise Sources

Gardena is impacted by various noise sources, including mobile and stationary. Mobile noise sources, especially cars, trucks, and trains are the most common and substantial sources of noise. Other noise sources are the various land uses (i.e., residential, commercial, institutional, and recreational) throughout the City that generate stationary-source noise.

As previously noted, the Project site is fully developed except an approximately 1.6-acre undeveloped area on the southeastern corner. The Project site is occupied by commercial use, automotive repair and taxi service building, and associated surface parking.

Land uses surrounding the Project site include commercial and industrial uses. The site is bounded by warehouses to the north, Rosecrans Avenue to the south, a self-storage facility to the east, and a U-Haul lot to the west.

Mobile Sources

The existing mobile noise sources in the Project area are generated by motor vehicles traveling along Rosecrans Avenue, including the vehicle traffic associated with the existing on-site commercial, automotive, and taxi site uses. The GGP has identified arterials and train movements as the City's most significant noise sources. The Circulation Element classifies Rosecrans Avenue as an Arterial.[58]

[58] City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006. Figure CI-1: Roadway Network*. Gardena, CA: City of Gardena.

Stationary Sources

The Project area's primary stationary noise sources are those associated with the on-site commercial, automotive, and taxi site uses, which include a surface parking lot, vehicle maintenance, and mechanical equipment (e.g., heating ventilation and air conditioning [HVAC] equipment)). The noise associated with these sources and other nearby sources may represent a single-event noise occurrence or short-term noise.

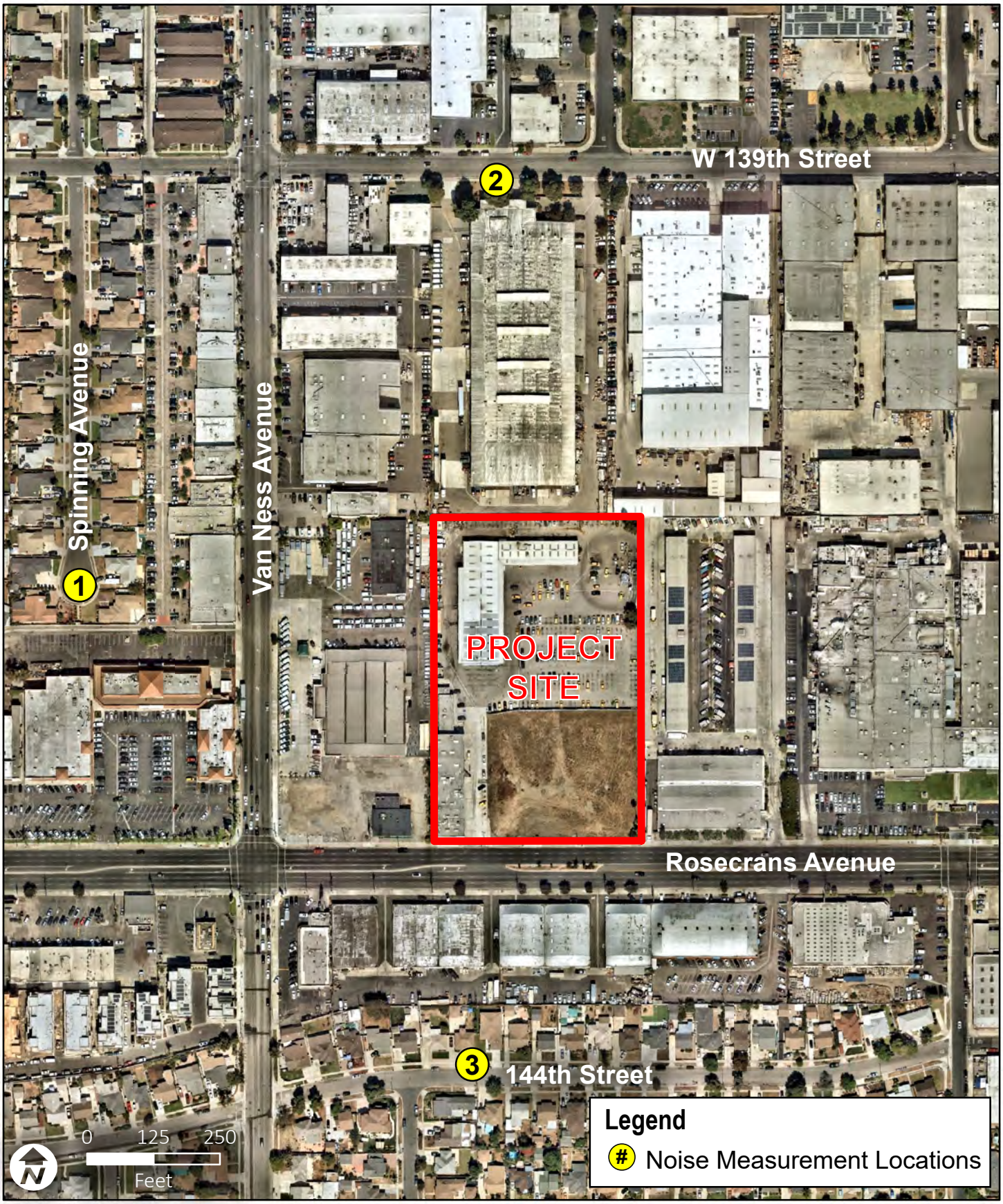
Noise Measurements

To quantify existing ambient noise levels in the Project area, Kimley-Horn conducted three short-term noise measurements on January 14, 2020. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Project site. The 10-minute measurements were taken between 1:44 PM and 2:32 PM. Short-term L_{eq} measurements are considered representative of the daily noise levels. The average noise levels and sources of noise measured at each location are listed in **Table 4.13-1: Existing Noise Measurements,** and shown on **Exhibit 4.13-1: Noise Measurement Locations**.

TABLE 4.13-1: EXISTING NOISE MEASUREMENTS

Site #	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Time
1	14029 Spinning Avenue	56.4	45.0	76.2	1:44 PM
2	2140 139th Street	67.0	50.7	80.5	2:03 PM
3	2123 144th Street	59.2	43.1	75.9	2:22 PM

Source: Noise measurements taken by Kimley-Horn, January 14, 2020. See **Appendix A** for noise measurement results.



Source: Near Maps - Image Dated January 1, 2019

Kimley»Horn

Welcome To GARDENA

Rosecrans Place Project
Initial Study/Mitigated Negative Declaration

Exhibit 4.13-1
Noise Measurement Locations

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Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Residences, hospitals, schools, guest lodging, libraries, and churches are treated as the most sensitive to noise intrusion and therefore have more stringent noise exposure targets than do other uses, such as manufacturing or agricultural uses that are not subject to impacts such as sleep disturbance. Sensitive receptors near the Project site consist mostly of residential, institutional (i.e., healthcare, religious, educational), and recreational uses. **Table 4.13-2: Sensitive Receptors**, identifies the sensitive receptors within the Project vicinity, as well as their distances and directions from the Project site.

TABLE 4.13-2: SENSITIVE RECEPTORS	
Receptor Type/Description	**Distance and Direction from the Project Site**
RESIDENTIAL	
Single-Family Residential Neighborhood	310 feet to the south
Single-Family Residential Neighborhood	550 feet to the west
Single-Family Residential Neighborhood	2,096 feet to the north
HEALTH CARE INSTITUTION	
Las Flores Convalescent Hospital	1,286 feet to the west
RELIGIOUS INSTITUTIONS	
Maria Regina Catholic Church	1,707 feet to the north
Bible Baptist Church	2,814 feet to the southeast
Iglesia Presbiteriana Bethesda	2,966 feet to the southwest
EDUCATIONAL INSTITUTIONS	
Junipero Serra High School	1,500 feet to the south
Maria Regina School – Private School	1,526 feet to the north
Chapman Elementary School	2,335 feet to the southeast
Purche Avenue Elementary School	2,663 feet to the northwest
RECREATIONAL FACILITIES	
Thornburg Park	2,306 feet to the southwest
Rowley Park	2,409 feet to the north
Luck Duck Swim School	2,844 feet to the southwest
Source: Google Earth Pro, 2019	

Local Regulatory Setting

Gardena General Plan 2006

The GGP establishes goals, policies, and programs to protect residents from excessive noise. The GGP identifies transportation, such as arterials and train movements, as the most significant noise-producing sources, as well as fixed sources.[59] Land uses near these significant noise-producers can incorporate buffers and noise control techniques including setbacks, landscaping, building transitions, site design, and building construction techniques to reduce the impact of excessive noise. Selection of the appropriate noise control technique would vary depending on the level of noise that needs to be reduced as well as the location and intended land use. The GGP includes acceptable noise levels associated with specific land uses; see **Table 4.13-3: Gardena Noise and Land Use Compatibility.**

The City has designated several streets/street segments as truck routes. General Plan Figure CI-3 illustrates the locations of Gardena's designated truck routes and indicates those nearest the Project site are Normandie Avenue to the east and Western Avenue to the west.[60]

City of Gardena Municipal Code

City of Gardena Municipal Code §8.36.040 and §8.36.050 state the exterior and interior noise standards for the City in terms of $L_{eq}(15)$ and L_{max}. **Table 4.13-4: Allowable Exterior and Interior Noise Levels**, provides the allowable noise levels at land uses receiving noise. 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. GMC §8.36.070: *Prohibited Acts*, prohibits the operation of a device that generates vibration which is above the perception threshold of an individual at or beyond the property line if the source is on private property.

[59] City of Gardena, *Gardena General Plan 2006 Community Safety Element Noise Plan,* 2006.

[60] City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006. Figure CI-3: Designated Truck Routes*. Gardena, CA: City of Gardena.

TABLE 4.13-3: GARDENA NOISE AND LAND USE COMPATIBILITY							
Land Use Category	**CNEL, dBA[1]**						
	<	***55***	***60***	***65***	**70**	**75**	**80**
Residential – Single-family, multifamily, duplex	A	A	B	C	C	NA	NA
Residential – Mobilehomes	A	A	B	C	C	NA	NA
Transient Lodging – Motels, hotels	A	A	B	B	C	C	NA
Schools, Libraries, Churches, Hospitals, Nursing Homes	A	A	B	C	C	NA	NA
Auditoriums, concert Halls, Amphitheaters, Meeting Halls	B	B	C	C	NA	NA	NA
Sports Arenas, Outdoor Spectator Sports, Amusement Parks	A	A	A	B	B	NA	NA
Playgrounds, Neighborhood Parks	A	A	A	B	C	NA	NA
Golf Courses, Riding Stables, Cemeteries	A	A	A	A	B	C	C
Office and Professional Buildings	A	A	A	B	B	C	NA
Commercial Retail, Banks, Restaurants, Theaters	A	A	A	A	B	B	C
Industrial, Manufacturing Utilities, Wholesale, Service Stations	A	A	A	A	B	B	B
Agriculture	A	A	A	A	A	A	A

Notes:
1. CNEL = Community Equivalent Noise Level; dBA = Decibel

LEGEND:
A – Normally Acceptable – Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
B – 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 are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
C – 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.
D – Clearly Unacceptable – New construction or development should generally not be undertaken.
NA – Not Applicable

Source: City of Gardena, Gardena General Plan 2006 Community Safety Element Noise Plan, 2006.

TABLE 4.13-4: ALLOWABLE EXTERIOR AND INTERIOR NOISE LEVELS				
Type of Land Use	15-Minute Average Noise Level (L_{eq} (15))		Maximum Noise Level (L_{max})	
	7 am – 10 pm	10 pm – 7am	7 am – 10 pm	10 pm – 7 am
Exterior Noise Levels				
Residential	55 dB(A)	50 dB(A)	75 dB(A)	70 dB(A)
Residential portions of mixed-use	60 dB(A)	50 dB(A)	80 dB(A)	70 dB(A)
Commercial	65 dB(A)	60 dB(A)	85 dB(A)	80 dB(A)
Industrial of manufacturing	70 dB(A)	70 dB(A)	90 dB(A)	90 dB(A)
Interior Noise Levels				
Residential	45 dB(A)	40 dB(A)	65 dB(A)	60 dB(A)
Residential portions of mixed-use	45 dB(A)	40 dB(A)	70 dB(A)	60 dB(A)
Source: City of Gardena, *City of Gardena Municipal Code,* §8.36.040 and §8.36.050, 2018.				

Impact Analysis

4.13a Would the project result in generation a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact.

Construction Noise

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators, can reach high levels. Construction activities would include site preparation, grading, building construction, paving, and architectural coating. Such activities would require graders, scrapers, and tractors during site preparation; graders, dozers, and tractors during grading; cranes, forklifts, generators, tractors, and welders during building construction; pavers, rollers, mixers, tractors, and paving equipment during paving; and air compressors during architectural coating. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators, can reach high levels. **Table 4.13-5: Typical Construction Noise Levels**,[61] lists typical noise levels associated with individual construction equipment at 50 feet from the source and at the nearest noise sensitive receptors (the single-family residences 310 feet to the south (94 meters)).

[61] This Project will not use a pile driver.

TABLE 4.13-5: TYPICAL CONSTRUCTION NOISE LEVELS		
Equipment	**Typical Noise Level (dBA) at 50 feet from Source**	**Typical Noise Level (dBA) at 310 feet from Source[1]**
Air Compressor	80	64
Backhoe	80	64
Compactor	82	66
Concrete Mixer	85	69
Concrete Pump	82	66
Concrete Vibrator	76	60
Crane, Derrick	88	72
Crane, Mobile	83	67
Dozer	85	69
Generator	82	66
Grader	85	69
Impact Wrench	85	69
Jack Hammer	88	72
Loader	80	64
Paver	85	69
Pile-driver (Impact)	101	85
Pile-driver (Sonic)	95	79
Pneumatic Tool	85	69
Pump	77	61
Roller	85	69
Saw	76	60
Scraper	85	69
Shovel	82	66
Truck	84	68
Notes: 1. Calculated using the inverse square law formula for sound attenuation: $dBA_2 = dBA_1+20Log(d_1/d_2)$ Where: dBA_2 = estimated noise level at receptor; dBA_1 = reference noise level; d_1 = reference distance; d_2 = receptor location distance		
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.		

Project construction would occur adjacent to industrial and commercial uses (i.e., warehouses to the north, Rosecrans Avenue to the south, a self-storage facility to the east, and a U-Haul lot to the west). No sensitive receptors are adjacent to the Project site. The nearest sensitive receptors to the Project site are single-family residences located 310 feet to the south, across Rosecrans Avenue. These sensitive receptors could be exposed to elevated exterior noise levels during Project construction, as indicated in **Table 4.13-5**. However, construction-related exterior noise levels would be unlikely to affect the sensitive receptors surrounding the construction site, given construction noise would be attenuated by: 1) industrial and commercial buildings situated between the Project site and nearest residences; and 2) mobile noise sources (i.e., vehicular traffic) along two roadways (i.e., Van Ness Avenue, a Major Collector,[62] and Rosecrans Avenue,

[62] City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006. Figure CI-1: Roadway Network*. Gardena, CA: City of Gardena.

an Arterial[63]) situated between the Project site and nearest residences. Further, construction noise would be acoustically dispersed throughout the Project site and not concentrated in one area near sensitive receptors.

The GMC does not establish quantitative construction noise standards. Instead, the City has established limited hours of construction activities. GMC §8.36.080: *Exemptions*, exempts noise associated with new construction activity, remodeling, rehabilitation, or grading of any property from the GMC noise limitations, provided construction activities take place between the hours of 7:00 AM and 6:00 PM on weekdays, between the hours of 9:00 AM and 6:00 PM on Saturdays, with no construction activities taking place at any time on Sundays or federal holidays. All motorized equipment used in such activity shall be equipped with functioning mufflers as mandated by the state. Additionally, existing noise levels in the Project vicinity range from 56.4 to 67.0 dBA Leq; see **Table 4.13-1**.

Construction activities may also cause increased noise along access routes to and from the Project site due to movement of equipment, materials, and workers. Approximately 1,415 CY of net soil import is anticipated, which would be transported along local roadways, including Rosecrans Avenue and the truck routes nearest the Project site (i.e., Normandie Avenue to the east and Western Avenue to the west). Compliance with GMC would minimize impacts from construction noise, as construction would be limited to daytime hours on weekdays and Saturdays. Thus, following compliance with GMC standards, Project construction activities would result in a less than significant noise impact.

Operational Noise

The Project proposes to replace the existing commercial uses with a mixed-use development consisting of 113 DU, including 57 attached townhouse units, 41 detached garden court units, and 15 live-work units with 3,949 SF of work space. Thus, the operational noise (stationary and traffic) associated with the existing commercial, automotive repair, and taxi service uses would cease and would be replaced with operational noise typical of residential and commercial uses. The Project's major noise sources, which include stationary noise sources and mobile noise sources (i.e., off-site vehicular traffic).

Stationary Noise Sources**.** With Project implementation, the stationary noise sources (i.e., surface parking lot, outdoor trailer storage, loading/unloading activities, and HVAC equipment) associated with the existing commercial, automotive repair, and taxi service uses would be removed and replaced with stationary noise typical of residential uses and a commercial use. Noise typical of residential uses includes group conversations, pet noise, and general maintenance activities. Noise typical of commercial uses includes delivery trucks traveling on the site, mechanical equipment, and parking lot activities. Generally, noise levels from stationary sources are anticipated to decrease with Project implementation, as compared to the existing commercial, automotive repair, and taxi service uses, given that the existing uses would be replaced with primarily residential uses and limited work floor area. Further, noise from residential stationary sources would primarily occur during the "daytime" activity hours of 7:00

[63] Ibid.

AM to 10:00 PM. Additionally, the residences would be subject to compliance with the GGP and GMC noise standards.

The Project is surrounded primarily by commercial and industrial uses. The nearest sensitive receptors to the Project site are the single-family residences located 310 feet to the south, beyond the industrial and commercial uses and on the opposite side of Rosecrans Avenue. Potential stationary noise sources related to long-term Project operations would include mechanical equipment. Mechanical equipment (e.g., heating ventilation and air conditioning [HVAC] equipment) typically generates noise levels of approximately 52 dBA at 50 feet from the source. The HVAC units associated with the proposed buildings would be located more than 310 feet from the nearest sensitive receptors. At 310 feet, HVAC and other mechanical equipment noise would be 35 dBA, which would be below the City's 55 dBA standard.

Nominal parking noise would occur within the on-site shared driveway and visitor parking stalls. It is also noted that parking noise occurs at the adjacent properties under existing conditions. Parking and driveway noise would be consistent with the existing noise in the vicinity and would be partially masked by background traffic noise from motor vehicles traveling along Rosecrans Avenue. Trash pickup would occur, but these noise sources would be intermittent and similar to/less than noise levels near Rosecrans Avenue. Actual noise levels over time resulting from parking activities are anticipated to be below the City's noise standards.

Therefore, the Project's stationary noise sources (i.e., mechanical equipment, parking lots, and deliveries/pick-ups) would not generate excessive noise levels. Impacts would be less than significant in this regard, and no mitigation is required.

Mobile Noise Sources**.** Project implementation would generate traffic volumes along Rosecrans Avenue and Project area roadways. The Project would generate approximately 818 ADT.[64] This trip generation estimate is conservative given trip credits for the existing land uses that would be displaced have not been applied. When trip credits for the existing commercial, automotive repair, and taxi service uses are applied to the Project's trip generation estimates, the Project's net new trips would be offset, with proportionate offsets in traffic noise. Notwithstanding, for a conservative approach, this analysis assumes a trip generation increase of 818 ADT. The Project's traffic would result in noise on Project area roadways. In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to generate a 3-dBA increase.[65] The Circulation Element classifies Rosecrans Avenue (the nearest roadway) as an Arterial roadway, and does not have calculated average daily traffic. These roadways carry an average of 40,000 to 60,000 vehicles per day.[66] Even without applying the credit for the existing noise associated with the displaced land uses, the Project-related traffic increase would not result in a permanent 3-dBA increase in ambient noise levels. Therefore,

[64] **Appendix H3. Transportation Memo**.

[65] According to the California Department of Transportation, *Technical Noise Supplement to Traffic Noise Analysis Protocol* (September 2013), it takes a doubling of traffic to create a noticeable (i.e., 3 dBA) noise increase.

[66] City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006. Circulation Element page CI-3*. Gardena, CA: City of Gardena.

Project mobile noise sources (i.e., vehicular traffic) would not generate excessive noise levels. Impacts would be less than significant in this regard, and no mitigation is required.

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

Less Than Significant Impact.

Construction

Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction could result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.20 in/sec is considered safe and would not result in any construction vibration damage.

Table 4.13-6: Typical Construction Equipment Vibration Levels, lists vibration levels at 25 feet for typical construction equipment. Groundborne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As indicated in **Table 4.13-6**, based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity.

TABLE 4.13-6: TYPICAL CONSTRUCTION EQUIPMENT VIBRATION LEVELS

Equipment	Peak Particle Velocity at 25 Feet (in/sec)
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Rock Breaker	0.059
Jackhammer	0.035
Small Bulldozer/Tractors	0.003

Notes:
[1] Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance; PPV_{ref} = the reference vibration level in in/sec from Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual Table 7-4*, 2018; D = the distance from the equipment to the receiver.

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

The nearest sensitive receptors to the Project site are the residential uses 310 feet to the south. As indicated in **Table 4.13-6**, construction equipment vibration velocities at 25 feet would not exceed 0.089 in/sec PPV, which is below the FTA's 0.20 PPV threshold. Thus, vibration velocities would be significantly lower at a distance of 310 feet. It is also acknowledged that construction activities would occur throughout the Project site and would not be concentrated at the point closest to the nearest residential structure. Therefore, Project construction-related activities would not generate excessive groundborne vibration. Impacts would be less than significant in this regard, and no mitigation is required.

Operations

The Project proposes a mixed-use development with residential and commercial uses that would not involve railroads or substantial heavy truck operations. Rather, the Project would remove the existing commercial, automotive repair, and taxi service uses, removing the groundborne vibration associated with the existing truck operations. Therefore, Project operations would not generate excessive groundborne vibration. Impacts would be less than significant in this regard, and no mitigation is required.

4.13c Would the project be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. Refer to Response 4.9e. Additionally, there are no private airstrips located within the Project vicinity. Therefore, the Project would not expose people residing or working in the Project area to excessive airport- or airstrip-related noise levels. Impacts would be less than significant in this regard, and no mitigation is required.

Cumulative Noise Impacts

The Project's construction activities would not result in a substantial temporary increase in ambient noise levels. As discussed in Response 4.13a, GMC §8.36.080 exempts noise associated with new construction activity, remodeling, rehabilitation, or grading of any property from the GMC noise limitations, provided construction activities take place between the hours of 7:00 AM and 6:00 PM on weekdays, between the hours of 9:00 AM and 6:00 PM on Saturdays, with no construction activities taking place at any time on Sundays or federal holidays. There would be periodic, temporary, construction-related noise impacts that would cease once Project construction is completed. The Project would contribute to other proximate construction noise impacts, if construction activities were conducted concurrently. However, based on the noise analysis above, the Project's construction-related noise impacts would be less than significant following compliance with the GMC.

Given that noise dissipates as it travels away from its source, operational noise impacts from on-site activities and other stationary sources would be limited to the Project site and vicinity. Thus,

cumulative operational noise impacts from related projects, in conjunction with Project-specific noise impacts, would not be cumulatively significant.

4.14 Population and Housing

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
Source: Kimley-Horn & Associates				

Impact Analysis

4.14a Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The City's population as of January 1, 2020 is approximately 60,937 persons.[67] The City's housing stock totaled 21,982 DU with approximately 2.83 PPH.

The Project would remove all existing on-site structures and in their place construct a mixed-use development consisting of 113 DU, including 15 live-work units with 3,949 SF of work space. A project could induce direct population growth in a city through development of housing and businesses. The Project proposes housing and businesses, however, as concluded below, the Project's forecast population growth is neither substantial or unplanned. Additionally, the Project does not propose to extend roads or other infrastructure, thus, would not induce population growth in the City indirectly.

The Project would induce direct population growth in the City through housing development. Assuming 113 DU and 2.83 PPH, the Project's forecast population growth associated with the new housing is approximately 320 persons. Given the scale and nature of the live-work units and the City requirement that work is to be performed by persons who live in the unit, the Project would not generate employment. Therefore, the Project would not induce direct population growth in the City through business development (i.e., live-work units).

[67] California Department of Finance. (2020). E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark.

The Project's forecast population growth of approximately 320 persons associated with the new homes would increase the City's existing population of approximately 60,937persons by less than one percent (approximately 0.53 percent). However, the Project's forecast population growth was not unplanned when compared to the existing General Commercial with a MU designation. As discussed in detail in Response 4.11b, the Project site's maximum residential development capacity is 164 DU and maximum general commercial development capacity is 119,137 SF, based on the existing General Commercial with a MUO designations. Assuming 164 DU and 2.83 PPH, the forecast population growth associated with new homes based on maximum allowed density is approximately 464 persons. Based on a 5.47-acre site and approximately 25.76 employees per acre, the forecast employment growth associated with new businesses based on maximum allowed non-residential land use intensity is approximately 141 jobs. It is assumed the new jobs would be filled by local residents who already reside within the City. Therefore, the forecast employment growth associated with new businesses based on maximum allowed non-residential land use intensity would not induce direct population growth in the City.

The Project's forecast population growth of approximately 320 persons was not unplanned and would be approximately 31 percent less than the forecast population growth based on maximum allowed density of approximately 464 persons. 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 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-wide context. Therefore, the Project would not induce substantial unplanned direct population growth in the City through new homes or businesses. A less than significant impact would occur in this regard, and no mitigation is required.

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

No Impact. The Project would not displace existing housing or require construction of replacement housing elsewhere, since no housing is located onsite. Therefore, no impact would occur in this regard, and no mitigation is required.

4.15 Public Services

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

Impact Analysis

4.15a Fire Protection?

Less Than Significant Impact. The City contracts with 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 fire station nearest the Project site is Station #159, approximately 0.4 miles to the north. The Project's forecast population growth 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 final map, access, and water system requirements (see **Appendix I**), which would enhance the Project's fire protection. LACFD Fire Prevention Division granted clearance of Vesting Tentative Tract Map #82667 for access requirements only on May 12, 2020 and the Project would be required to comply with standard LACFD COA.

The Project does not propose, and would not create a need for, new/physically altered fire protection facilities to maintain acceptable service ratios/response times. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Given the Project's nature and scope, a less than significant impact would occur concerning fire protection facilities, and no mitigation is required.

4.15b 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 police station nearest the Project site is at 1718 West 162nd Street, approximately 1.8 miles to the south. The Project's forecast population growth would incrementally increase the demand for police protection services to the Project site. However, through the City's Site Plan Review process, the

GPD would review the Project concerning access and other safety measures, which would enhance the Project's police protection.

The Project does not propose, and would not create a need for, new/physically altered police protection facilities to maintain acceptable service ratios/response times. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Given the Project's nature and scope, a less than significant impact would occur concerning police protection facilities, and no mitigation is required.

4.15c 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.[68]

- Chapman Elementary School (K-5),
- Peary Middle School (6-8), and
- Junipero Serra High School (9-12).

Various private schools serving Kindergarten through 12th grades also exist in the Project area.

Based on 113 DU and LAUSD's student generation factor of 0.437 students per new DU, the proposed Project is forecast to generate approximately 49.4 new students to the LAUSD.[69] The Project's forecast student population growth 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…"

The Project does not propose, and would not create a need for, new/physically altered school facilities to maintain acceptable service ratios/standards. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Given the Project's nature and scope, a less than significant impact would occur concerning schools.

4.15d Parks?

Less Than Significant Impact. See Response 4.16 below.

4.15e 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.[70] Los Angeles County Library is responsible for maintenance and library improvements to meet future library

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

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

[70] LA County Library. (2018). Public Libraries. https://www.lacounty.gov/things-to-do/libraries-museums/public-libraries/.

service's demands. The Project's forecast population growth 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.

The Project does not propose, and would not create a need for, new/physically altered library facilities to maintain acceptable service ratios/standards. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Given the Project's nature and scope, a less than significant impact would occur concerning libraries, and no mitigation is required.

4.16 Recreation

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	
Source: Kimley-Horn & Associates				

Impact Analysis

4.16a Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

4.16b Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. The Project's forecast population growth could incrementally increase the use of existing recreational facilities. However, this incremental increase would not be such that substantial physical deterioration of an existing recreational facility would occur or be accelerated. As discussed below, the Project proposes onsite passive open space uses in excess of GMC requirements and is also subject to compliance with GMC Chapter 17.20: *Park and Recreation Dedication Fees*. Therefore, impacts would be less than significant in this regard, and no mitigation is required.

GMC §18.19.060(i) requires 150 SF/DU of open space. For live/work units, a minimum of 100 SF/DU is required. The Project proposes 113 DU, 15 of which are live/work, thus, would require 16,200 SF of open space to meet City standards. The Project proposes approximately 25,915 SF of private open space (approximately 5,758 SF within private yards and approximately 20,157 SF within private decks) and approximately 42,353 SF of common open space (a 2,224 SF barbeque area and 42,129SF of paseos and terraces). In total, the Project proposes 68,268 SF of private and public open space, which would exceed GMC's minimum open space standard.

Under GMC Chapter 17.20, the City requires dedication of land, payment of fees, or a combination of both for park or recreational purposes. GMC §17.20.030: *Amount of Land to be Dedicated and/or Amount of Fees in Lieu if Land Dedication*, 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 320 persons; see Response 4.14a. 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 0.975 acres of usable park area. Under GMC §17.20.100B, the City could require the dedication of land, payment of fees, or a combination of both in compliance with the City's requirements for park and recreation dedication fees. In this case, the City will require payment of fees, which are set at $10,000 per DU in accordance with City Council Resolution No. 6433. Pursuant to GMC Chapter 17.20, any fees received by the City would be used for either acquiring land or developing new or rehabilitating existing park and recreational facilities. If it is determined that construction of new recreational facilities is warranted and that proposal is subject to CEQA, the City would conduct further environmental analysis to determine whether adverse physical effects on the environment would occur. Further, the Project does not propose recreational facilities. Therefore, the Project would not have an adverse physical effect on the environment concerning construction or expansion of recreational facilities.

4.17 Transportation

This Section is primarily based on the following documents:

- *Transportation Impact Study Rosecrans Place Mixed-Use Project* (Linscott, Law, & Greenspan, February 27, 2020 (Transportation Study); see **Appendix H1: Transportation Impact Study**.
- Draft SB 743 Transportation Analysis Figure 1: Low VMT Areas, and Figure 3: Transit Priority Area (Fehr & Peers, February 2020) (SB 743 Analysis); see **Appendix H2: Draft SB 743 Maps**.
- *Memorandum: Trip Generation Assessment for the Updated Rosecrans Place Project City of Gardena* (Linscott, Law, & Greenspan, April 24, 2020 (Transportation Memo); see **Appendix H3: Transportation Memo**.

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

Impact Analysis

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

Less Than Significant Impact.

Circulation System – Level of Service Analysis

In 2013, the State Legislature adopted Public Resources Code Section 21099, which required a change in methodology in assessing traffic impacts from looking at delay (level of service (LOS)) to vehicle miles of travel ("VMT"). According to this section, use of LOS to measure impact would not be considered as a significant impact once the Secretary of the Natural Resources Agency certified the new guidelines. However, the guidelines that were adopted provided that the lead agency would have to cease using a LOS standard on July 1, 2020, although the lead agency could

elect to be governed by the new provisions before that date. Given the conflict between the state statute and the State CEQA Guidelines, and in an abundance of caution, this analysis examines significant impacts from both a LOS standard (as follows) and a VMT standard; see **Response 4.17b**.

The goals of using a VMT analysis are to: encourage infill development; reduce greenhouse gasses; and improve public health. VMT captures the number and length of trips that would result on the roadway network, rather than traffic flow.

A Transportation Study (**Appendix H1**) was prepared to identify and evaluate the Project's potential transportation impacts, following the City's current Gardena traffic study guidelines, as well as the intersection threshold criteria set forth in the Los Angeles County Department of Public Works (LACDPW) traffic study guidelines. The analysis evaluates potential Project-related impacts at the following five study intersections in the Project's vicinity, which were identified through consultation with City staff. The Intersection Capacity Utilization method was used to determine Volume-to-Capacity ratios and corresponding LOS at the study intersections.

The net new Project traffic volumes were added for each new condition volumes (i.e., existing condition and future without Project conditions) to determine the change in capacity utilization at the study intersections. Transportation impacts at the study intersections were analyzed for the following conditions:

a. Existing conditions,

b. Existing with Project conditions.

c. Condition [a] plus one percent (1.0%) annual ambient traffic growth through year 2022 and with completion and occupancy of the related projects (i.e., future without Project conditions).

d. Condition [b] with implementation of Project mitigation measures, where necessary.

e. Condition [d] with completion and occupancy of the proposed Project.

f. Condition [e] with implementation of Project mitigation measures, where necessary.

Study Area

Five study intersections were identified for evaluation during the weekday morning (AM) and afternoon (PM) peak hours based on consultation with City Staff. The study intersections provide local access to the study area and define the extent of the boundaries for the transportation analysis. Further discussions of the study area and existing street system are provided in **Appendix H1** Sections 1.2 and 4.0. The five study intersections depicted on **Exhibit 4.17-1: Existing Street System**, and listed below define the extent of the boundaries for this transportation impact study:

1. Purche Avenue/Rosecrans Avenue,

2. Van Ness Avenue/139th Street,

3. Van Ness Avenue/Rosecrans Avenue,
4. Van Ness Avenue/147th Street-146th Place, and
5. Gramercy Place/Rosecrans Avenue.

With Project Conditions

Proposed Project Trip Generation. Traffic volumes expected to be generated by the proposed Project were forecast for the weekday AM and PM peak hours and a 24-hour period for a typical weekday. Additionally, the Project trip generation forecasts were credited with the trip generation forecasts of the existing land uses that would be displaced.

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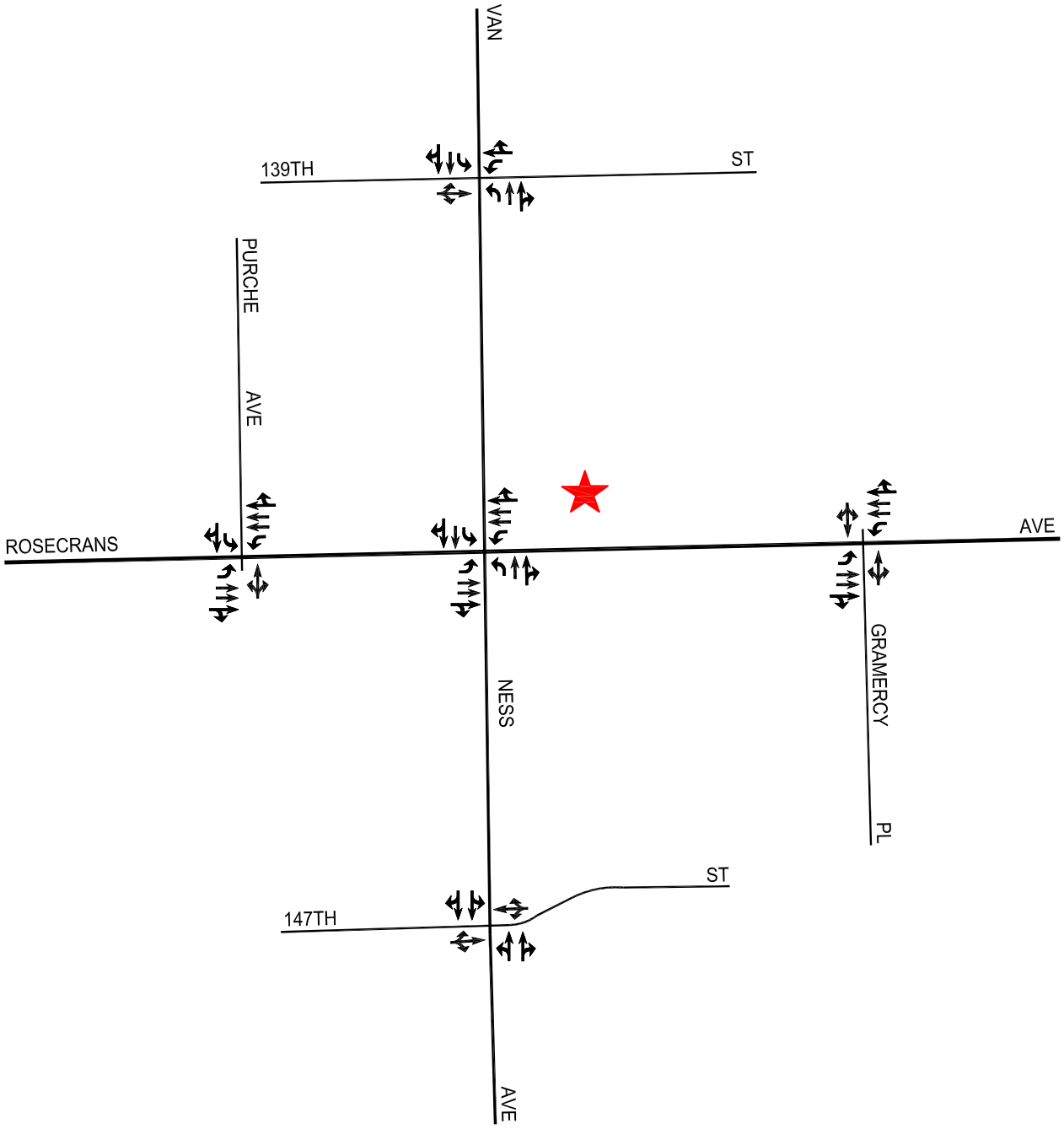

PROJECT SITE

NOT TO SCALE

Source: *Transportation Impact Study: Rosecrans Place Mixed-Use Project*

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Table 4.17-1: Project Trip Generation Forecast, provides the forecast of the Project's net new vehicular trips and indicates the proposed Project is expected to generate a net increase of 30 vehicle trips (5 fewer inbound trips and 35 more outbound trips) during the AM peak hour and a net increase of 51 vehicle trips (40 more inbound trips and 11 more outbound trips) during the PM peak hour. Over a 24-hour period during a typical weekday, the proposed Project is forecast to generate a net increase of 548 ADT (274 inbound trips and 274 outbound trips).

TABLE 4.17-1: PROJECT TRIP GENERATION FORECAST

LAND USE	ITE LAND USE CODE[1]	SIZE	DAILY TRIP ENDS VOLUMES[2]	AM PEAK HOUR VOLUMES[2]			PM PEAK HOUR VOLUMES[2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
Proposed Project									
Multi-Family Housing	221	57 DU	310	5	16	21	15	10	25
Single-Family Housing	210	41 DU	388	8	22	30	26	15	41
Live-Work (Dwelling Units) Live-Work (Workspace)	221 710	15 DU 3,969 GSF	82 38	1 4	4 1	5 5	4 1	3 4	7 5
Subtotal Proposed Project			***818***	***18***	***43***	***61***	***46***	***32***	***78***
Existing Uses to be Removed[4]		(42,400) GSF	(270)	(23)	(8)	(31)	(6)	(21)	(27)
NET NEW PROJECT TRIPS			***548***	***(5)***	***35***	***30***	***40***	***11***	***51***

[1] Source: ITE "Trip Generation Manual," 10th Edition, 2017.
[2] Trips are one-way traffic movements, entering or leaving.
[3] The AM and PM peak hour trips are based on driveway counts conducted at the site in May 2019 by The Traffic Solution. The PM peak hour of trip generation is assumed to represent 10 percent (10%) of daily trips.

Project Trip Distribution and Assignment. Project traffic volumes both entering and exiting the site have been distributed and assigned to the adjacent street system. The Project traffic volume distribution percentages during weekday AM and PM peak hours at the study intersections are illustrated in **Exhibit 4.17-2: Project Trip Distribution**. The net new traffic volume assignments, which are presented in **Exhibit 4.17-3: Net New Project Traffic Volumes – Weekday AM Peak Hour,** and **Exhibit 4.17-4: Net New Project Traffic Volumes – Weekday PM Peak Hour**, reflect the traffic distribution characteristics shown in **Exhibit 4.17-2** and the Project traffic generation forecasts presented in **Table 4.17-1**.

Impact Analysis Methodology and Impact Criteria and Thresholds. The intersection analysis methodology and intersection impact criteria and thresholds are discussed in detail in **Appendix H2** Sections 8.1 and 8.2.

Impact Analysis. As indicated in **Table 4.17-2: Intersection Level of Service Summary**, with application of the study intersection threshold criteria, under both the "Existing With Project" and "Future With Project" scenarios, the proposed Project would result in a less than significant impact at the study area intersections. Incremental, but less than significant, impacts are noted

at the study intersections. Therefore, less than significant impacts would occur in this regard, and no mitigation is required.

TABLE 4.17-2: SUMMARY OF VOLUME RATIOS AND LEVELS OF SERVICE WEEKDAY AM AND PM PEAK HOURS

No.	Intersection	Peak Hour	[1]	[2]		[3]	[4]	
			Year 2019 Existing V/C Or Los Delay [A]	Year 2019 Existing W/ project V/C Or Los Delay [A]	Change Signif. V/C Or Impact Delay [B] [(2)-(1)]	Year 2022 Future Pre-Project V/C Or Los Delay [A]	Year 2022 Future W/ Project V/C Or Los Delay [A]	Change Signif. V/C Or Impact Delay [B] [(4)-(3)]
1	Purche Avenue / Rosecrans Avenue	AM	0.450 A	0.452 A	0.002 No	0.463 A	0.465 A	0.002 No
		PM	0.468 A	0.470 A	0.003 No	0.483 A	0.486 A	0.003 No
2	Van Ness Avenue / 139th Street	AM	0.587 A	0.589 A	0.002 No	0.607 B	0.608 B	0.001 No
		PM	0.573 A	0.573 A	0.000 No	0.591 A	0.591 A	0.000 No
3	Van Ness Avenue / Rosecrans Avenue	AM	0.748 C	0.752 C	0.004 No	0.776 C	0.779 C	0.003 No
		PM	0.752 C	0.762 C	0.010 No	0.781 C	0.791 C	0.010 No
4	Van Ness Avenue / 147th Street -146th Place	AM	0.464 A	0.464 A	0.000 No	0.478 A	0.479 A	0.001 No
		PM	0.456 A	0.456 A	0.000 No	0.470 A	0.471 A	0.001 No
5	Gramercy Place / Rosecrans Avenue	AM	0.476 A	0.476 A	0.000 No	0.489 A	0.489 A	0.000 No
		PM	0.526 A	0.528 A	0.002 No	0.543 A	0.544 A	0.001 No

Notes:

[a] Level of Service (LOS) is based on the reported ICU value for signalized intersections.

[b] According to the County of Los Angeles Department of Public Works' *Traffic Impact Analysis Report Guidelines,* January 1, 1997, Page 6; an impact is considered significant if the project related increase in the volume-to-capacity ratio (v/c) equals or exceeds the thresholds shown below:

Level of Service	Pre-Project V/C	Project-Related Increase in V/C
C	>0.700 - 0.800	equal to or greater than 0.040
D	>0.800 – 0.900	equal to or greater than 0.020
E/F	>0.900	equal to or greater than 0.010

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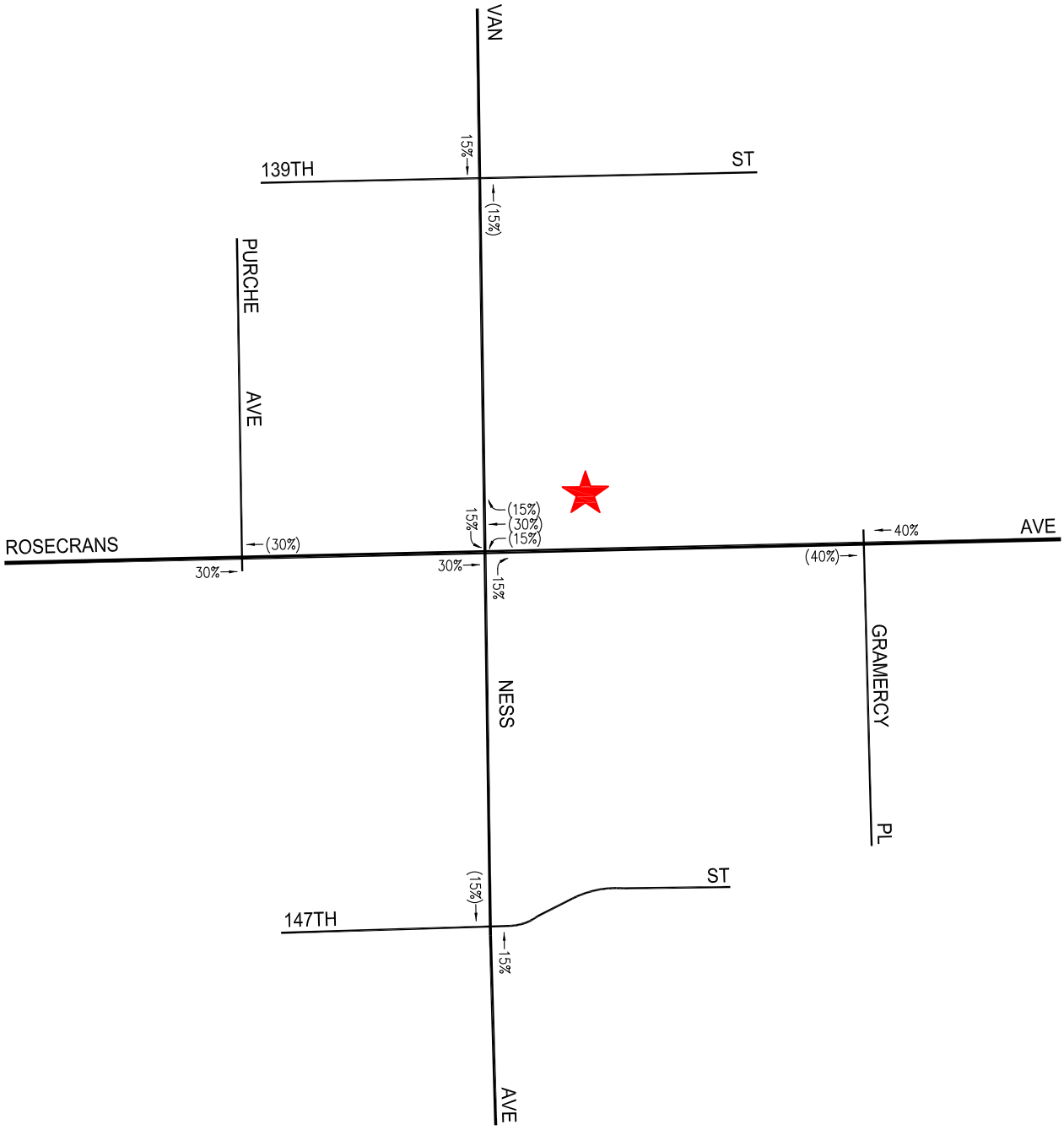

NOT TO SCALE

PROJECT SITE

XX = INBOUND PERCENTAGE

(XX) = OUTBOUND PERCENTAGE

Source: *Transportation Impact Study: Rosecrans Place Mixed-Use Project*

Exhibit 4.17-2
Project Trip Distribution

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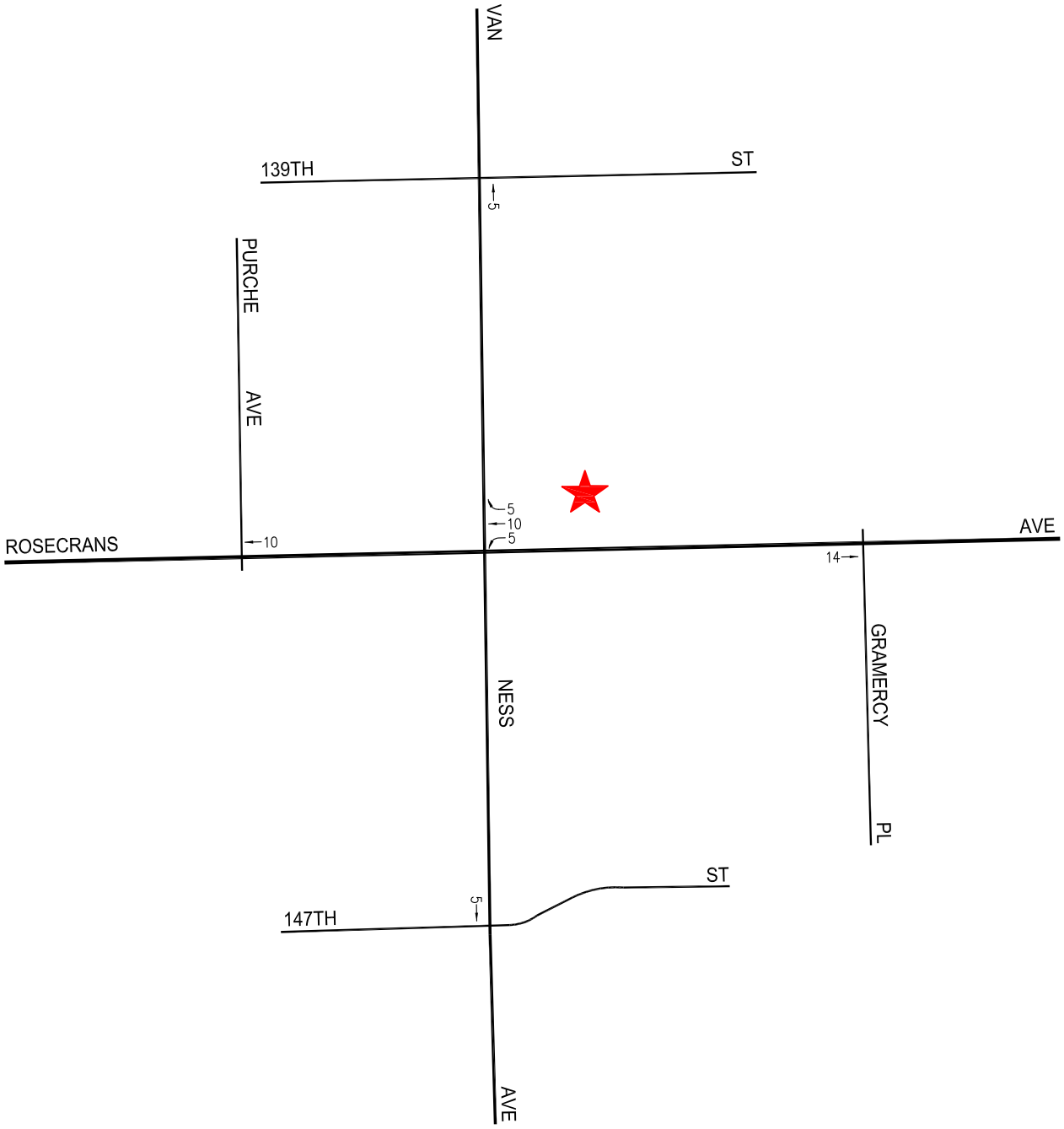

NOT TO SCALE

PROJECT SITE

Source: *Transportation Impact Study: Rosecrans Place Mixed-Use Project*

Exhibit 4.17-3
Net New Project Traffic Volumes - Weekday AM Peak Hour

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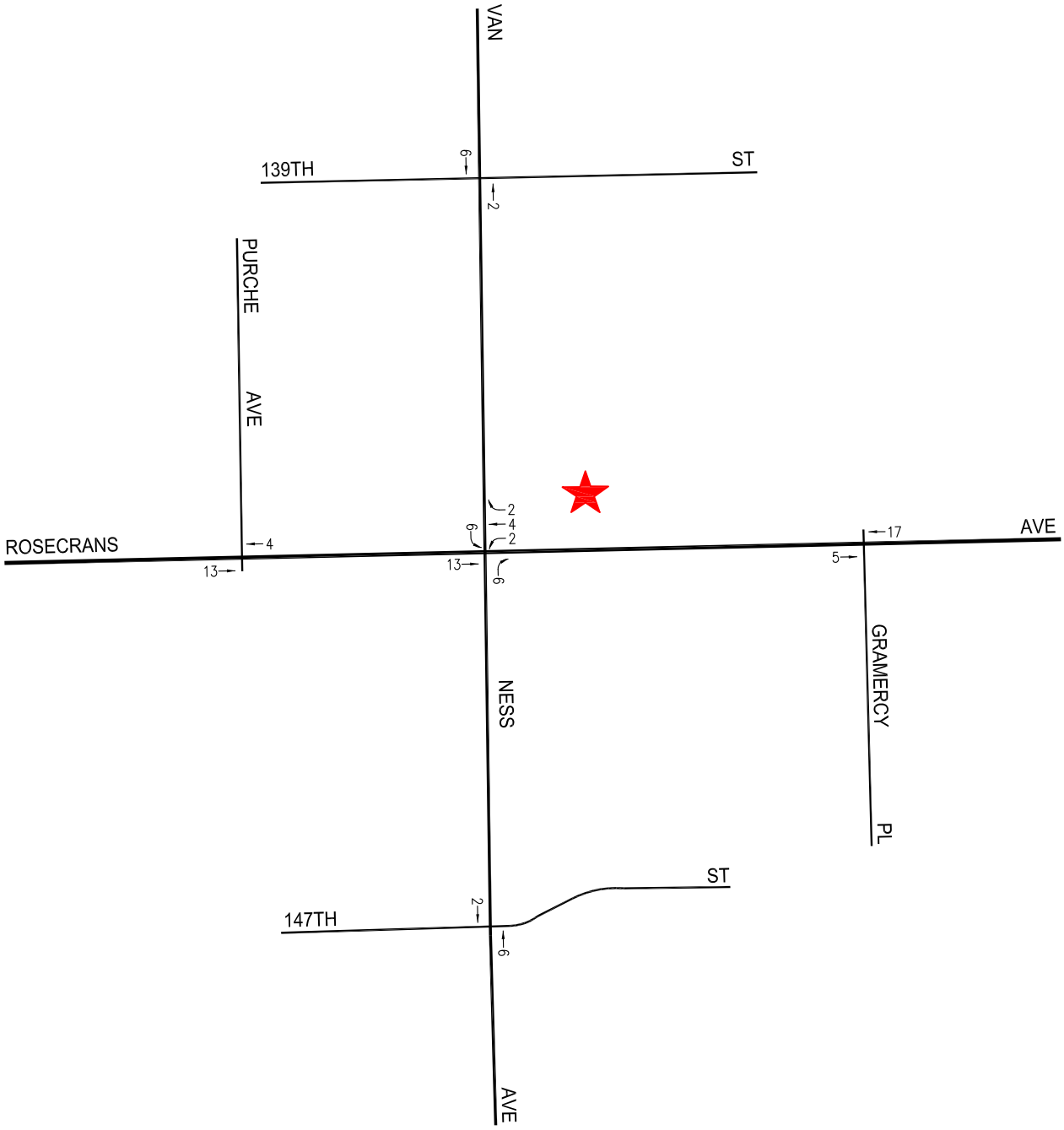

PROJECT SITE

NOT TO SCALE

Source: *Transportation Impact Study: Rosecrans Place Mixed-Use Project*

Exhibit 4.17-4
Net New Project Traffic Volumes - Weekday PM Peak Hour

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Transit Facilities

Transit service to the Project area is provided by LA Metro, which serves the greater Los Angeles metropolitan area, and by GTrans, the City's transit service. The bus stops nearest the Project site are located:

- On the west side of Van Ness Avenue, north and south of Rosecrans Avenue, approximately 490 feet and 500 feet from the Project site, respectively; and
- On the south side of Rosecrans Avenue, east of Van Ness Avenue and west of Gramercy Place, approximately 440 feet and 580 feet from the Project site, respectively.
- Bus routes serving the Project area are described in **Table 4.17-3: Existing Transit Routes**; and depicted in **Appendix H1**, Figure 4-2: Existing Transit Routes.

The Project would continue to be served by the existing transit system. The Project's population growth would incrementally increase the demand for public transit services. However, given its nature and scope, the Project would not conflict with a program plan, ordinance, or policy addressing transit. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

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TABLE 4.17-3: EXISTING TRANSIT ROUTES					
Route	Destinations	Roadway(s) Near Site	No. of Buses / Trains During Peak Hour		
			Direction	AM	PM
GTRAN Lin 1X	Redondo Beach to Downtown Los Angeles via Hawthorne, Torrance and Gardena	Van Ness Avenue, Marine Avenue	NB SB	2 2	2 2
GTRANS Lin 2	Gardena to Torrance via Carson	Western Avenue, 139th Street, Rosecrans Avenue	NB SB	4 5	4 4
GTRANS Lin 4	Harbor Gateway to Hawthorne via Gardena and Torrance	Van Ness Avenue, 139th Street, Rosecrans Avenue, 147th Street	EB WB	1 1	1 2
Metro 125	El Segundo to Norwalk via Lawndale, Los Angeles, Compton and Downey	Purche Avenue, Van Ness Avenue, Gramercy Place, Rosecrans Avenue	EB WB	3 4	3 3
Metro 209	Athens to Wilshire Center via Hawthorne, Hyde Park and Jefferson Park	Van Ness Avenue, 135th Street	NB SB	2 2	1 1
Metro 210/710	Redondo Beach to Hollywood vis Torrance, Hawthorne, Inglewood, Jefferson Park and Koreatown	Crenshaw Boulevard, 139th Street, Rosecrans Avenue, 147th Street	NB SB	9 7	7 8
Metro Green Line	Norwalk to Redondo Beach via Downey, Lynwood, Willowbrook, Los Angeles, Hawthorne and El Segundo	Crenshaw Boulevard	EB WB	10 10	10 10
Torrance Transit 2	Torrance and Gardena	Crenshaw Boulevard, 139th Street, Rosecrans Avenue, 147th Street	NB SB	1 1	1 1
Torrance Transit 5	Torrance and Gardena	Van Ness Avenue, 139th Street, Rosecrans Avenue, 147th Street	NB SB	1 1	1 1
Torrance Transit 10	Torrance and Gardena	Crenshaw Boulevard, 139th Street, Rosecrans Avenue, 147th Street	NB SB	2 2	2 2
			Total	**70**	**60**
[1] Sources: City of Gardena (GTRANS), Los Angeles County Metropolitan Transportation Authority (Metro) and City of Torrance (Torrance Transit) websites, 2020.					

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Bicycle Facilities

The Circulation Element classifies Van Ness Avenue (located west of the Project site) as a Class III bike route,[71] which are identified by signage along the street that denotes "BIKE ROUTE" (although there is no bike route signage along Van Ness Avenue in the Project vicinity). The Project's population growth would incrementally increase the usage of this bike route and others throughout the City. However, given its nature and scope, the Project would not conflict with a program plan, ordinance, or policy addressing bicycle facilities. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

Pedestrian Facilities

A sidewalk is provided along the Project site's Rosecrans Avenue frontage. The Project would not interfere with use of this sidewalk. The Project would provide pedestrian access via the primary entrance proposed on Rosecrans Avenue. The Project would not conflict with a program plan, ordinance, or policy addressing bicycle facilities. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

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

Less Than Significant Impact. State CEQA Guidelines §15064.3 codifies the change from Level of Service to VMT as a metric for transportation impact analysis. Pursuant to Senate Bill (SB) 743, VMT analysis is the primary method for determining CEQA impacts. Jurisdictions are not required to adopt VMT as a significant impact determination until July 1, 2020; however, they may move forward with establishing VMT thresholds ahead of the deadline.

The State of California Office of Planning and Research (OPR) has developed "screening thresholds" to quickly identify when a project should be expected to cause a less than significant impact without conducting a detailed study.[72] Thus, lead agencies may screen out VMT impacts using project size, whether a project site is in a low VMT area, and whether a project is in a high quality transit area ("HQTA").

The full set of screening criteria are summarized in **Table 4.17-4: VMT Screening Options for Land Use Projects**.

[71] City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006. Figure CI-41: Bikeways*. Gardena, CA: City of Gardena.

[72] State of California Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

TABLE 4.17-4: VMT SCREENING OPTIONS FOR LAND USE PROJECTS	
Screening Category	**Screening Criteria**
Project Type Screening	Presumed less than significant impact for local serving retail projects (defined as less than 50,000 SF per OPR's Technical Advisory) and projects that generate less than 110 daily trips.
Low VMT Area Screening	Presumed less than significant VMT impact for projects located in low VMT generating traffic analysis zones (TAZs). These TAZs generate total daily VMT per capita or per employee that is 15% less than the baseline level for the region.
Transit Priority Area (TPA) Screening	Presumed less than significant VMT impact for projects located in high- quality transit areas and does not have the following characteristics: • Floor Area Ratio (FAR) < 0.75 (for commercial projects only) • More parking than required by City • Inconsistent with the applicable RTP/SCS (as determined by the City) • Replaces affordable residential units with a smaller number of moderate- or high-income residential units
Source: Fehr & Peers, Draft SB 743 Transportation Analysis Updates, February 2020.	

The City has contracted with Fehr & Peers to provide a SB 743 Analysis and draft guidelines and thresholds (SB 743 Analysis) for the City based on OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) (December 2018). Although the draft is not final, Fehr & Peers has created maps showing Low VMT Area Screening and Transit Priority Area Screening. Additionally, the SB 743 Analysis identified various projects approved or being considered by the City, including the proposed Project, as "pilot projects" to outline the anticipated VMT analysis process. As described above, the Project proposes 113 three-story DU.

Project Type Screening. The Project's proposed residential use would generate approximately 780 ADT (see **Table 4.17-1**), which would exceed the 110 daily trip screening threshold. As such, the Project's residential use was not screened under this criterion from conducting further VMT analysis. The Project's proposed live-work commercial use (3,949 SF) would total less than 50,000 SF. As such, the Project's proposed live-work commercial use is screened from further VMT analysis resulting in a less than significant transportation impact concerning VMT.

Low VMT Area Screening. SB 743 Analysis Figure 1 illustrates the City's low VMT areas for the Base Year. Specifically, if a residential project is proposed in a TAZ that has VMT at least 15% lower than the regional average, the project would also be expected to generate VMT at least 15 percent lower than the regional average. The proposed Project is in a low VMT area; as such, the Project's proposed residential use is screened from further VMT analysis.

High-Quality Transit Area (HQTA) Screening. SB 743 Analysis Figure 3 illustrates the City's areas that qualify as high-quality transit. The proposed Project is in a HQTA; as such, the Project's proposed residential use is screened from further VMT analysis.

Based on Low VMT and HQTA screening, the Project's proposed live-work commercial use would result in a less than significant transportation impact concerning VMT.

Therefore, the Project would not conflict with State CEQA Guidelines §15064.3(b). A less than significant impact would occur in this regard, and no mitigation is required.

4.17c Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant With Mitigation Incorporated. Full vehicular access (i.e., left-turn and right-turn ingress/egress turning movements) is currently provided at the existing Project site driveways located along the south side of Rosecrans Avenue; see also **Appendix H1** Section 3.1.

To accommodate full vehicular access for the proposed Project and maintain existing ingress/egress movements for those driveways located along the south side of Rosecrans Avenue, it is recommended that the existing raised median located on Rosecrans Avenue (directly in front of the Project site) be removed and replaced with two-way left-turn lane striping. In addition, it is recommended that the existing eastbound left-turn pocket (which provides exclusive access to the existing Project site) be removed as this driveway would be closed as part of the proposed Project. The existing raised median in this area would be modified accordingly to accommodate the left-turn pocket removal. With the recommended Rosecrans Avenue median and striping modifications (see **MM TR-1**), full vehicular access would be provided in the immediate Project vicinity for Project residents, patrons, and nearby businesses. In addition, it is recommended that appropriate sight distances be provided at the proposed Project site driveways to minimize potential pedestrian/vehicle conflicts along the adjacent public sidewalk. Any proposed landscaping near the Project driveways would be required to be less than 36 inches in height to avoid obstructing the Rosecrans Avenue motorists' line of sight in accordance with City requirements.

The proposed Project does not include the use of any incompatible vehicles or equipment on-site, such as farm equipment. With mitigation incorporated, the Project would not provide any off-site roadway improvements that could substantially increase hazards due to a design feature. The Project is compatible with the surrounding land uses. All on-site and site-adjacent improvements, including **MM TR-1**, traffic signing and 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 also be subject to compliance with applicable GMC/California Department of Transportation sight distance standards. Therefore, with mitigation incorporated, the Project would not increase hazards due to a geometric design feature or incompatible uses. With mitigation, a less than significant impact would occur in this regard.

Mitigation Measures

MM TR-1 **Transportation Design Features.** Prior to Building Permit issuance and to the satisfaction of the City of Gardena Public Works Department:

- The existing raised median located on Rosecrans Avenue (directly in front of the Project site) shall be removed and replaced with two-way left-turn lane striping.

- The existing eastbound left-turn pocket (which provides exclusive access to the existing Project site) shall be removed as this driveway would be closed as part of the proposed Project. The existing raised median in this area would be modified accordingly to accommodate the left-turn pocket removal.
- Appropriate sight distances shall be provided at the proposed Project site driveways to minimize potential pedestrian and vehicle conflicts along the adjacent public sidewalk. Any proposed landscaping near the Project driveways shall be less than 36 inches in height to avoid obstructing the Rosecrans Avenue motorists' line of sight in accordance with City requirements.

4.17d Would the project result in inadequate emergency access?

Less Than Significant Impact. Primary vehicular access to the Project site is proposed via a two-way driveway at the southern boundary at Rosecrans Avenue. Vehicular metal sliding gates designed to meet LACFD standards and a visitor kiosk or pilaster (with telephone keypad) are proposed at the main entry. A secondary or emergency vehicle access equipped with a LACFD Knox box is proposed at the Project site's southeastern corner at Rosecrans Avenue. Pedestrian access is proposed via the primary entrance on Rosecrans Avenue. 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; see Response 4.15a. Following compliance with LACFD access requirements, adequate emergency access to the Project site would be provided. Impacts would be less than significant in this regard, and no mitigation is required.

4.18 Tribal Cultural Resources

This Section is based on Assembly Bill 52 (AB 52) communications initiated by the City; see **Appendix B2: Assembly Bill 52Communications**.

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

Impact Analysis

4.18ai Cause a substantial adverse change in the significance of a tribal cultural resource, listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k); or

4.18aii Cause a substantial adverse change in the significance of a tribal cultural resource- a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §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 With Mitigation Incorporated.

Assembly Bill 52

Chapter 532 Statutes of 2014 (i.e., Assembly Bill 52 (AB 52)) requires that lead agencies evaluate a project's potential impact on "tribal cultural resources," which include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives lead agencies the discretion to determine, based on substantial evidence, whether a resource qualifies as a "tribal cultural resource."

Native American groups may have knowledge about the area's cultural resources and may have concerns about a development's adverse effects on tribal cultural resources, as defined in PRC §21074. The tribe noted below requested to be notified of projects proposed within the City. The City provided formal notification to the designated contact/tribal representative that requested notice. Correspondence to and from tribal representatives is included as **Appendix B2**.

AB 52 Native American Group Contacted:

- **Gabrieleno Band of Mission Indians-Kizh Nation,** Andrew Salas.

The City initiated consultation with the Gabrieleno Band of Mission Indians-Kizh Nation pursuant to AB 52. The City engaged with the Gabrieleno Band of Mission Indians-Kizh Nation in consultation on the Project on March 5, 2020. The March 27, 2020 Gabrieleno Band of Mission Indians-Kizh Nation response identified the mitigation measures (i.e., MMs TCR-1 and TCR-2) required to mitigate potential impacts to as-yet undiscovered tribal cultural resources. MMs TCR-1 and TCR-2 detail the appropriate steps in the event of accidental discovery of cultural resources during ground-disturbing activities. Following compliance with MMs TCR-1 and TCR-2, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. With mitigation, a less than significant would occur in this regard.

As discussed in Response 4.9b, 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. With implementation of MMs TCR-1 and TCR-2, potential impacts to tribal cultural resources would be less than significant.

Mitigation Measures

MM TCR-1 **Retain a Native American Monitor/Consultant:** Prior to any ground disturbance, the Project Applicant shall retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and listed under the NAHC's Tribal Contact list for the Project area. This list is provided by the NAHC. The monitor/consultant shall only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño

Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

MM TCR-2 **Unanticipated Discovery of Tribal Cultural and Archaeological Resources:** Upon discovery of any archaeological resources, upon discovery of any tribal cultural or archaeological resources, construction activities shall cease in the find's immediate vicinity until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request preservation in place or recovery for educational purposes. Work may continue on other parts of the Project while evaluation and, if necessary, additional protective mitigation takes place (State CEQA Guidelines §15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines §15064.5(f) for historical resources.

Public Resources Code §§21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All Tribal Cultural Resources shall be returned to the Tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, non- profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the Tribe or a local school or historical society in the area for educational purposes.

4.19 Utilities and Service Systems

This Section is based on various *Will Serve Letters*, which are included in **Appendix I: Will Serve Letters.**

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded facilities concerning the following, the construction or relocation of which could cause significant environmental effects? i. Water, ii. Wastewater, iii. Wastewater Treatment (see Response 4.19.c below), iv. Stormwater Drainage, v. Electric Power, Natural Gas, and Telecommunications.			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project projected demand in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	
Source: Kimley-Horn & Associates				

Impact Analysis

4.19a Require or result in the relocation or construction of new or expanded facilities concerning the following, the construction or relocation of which could cause significant environmental effects?

i. Water,

Less Than Significant Impact. See Response 4.19b below.

ii. Wastewater,

iii. Wastewater Treatment,

Less Than Significant Impact. See Response 4.19.c below.

iv. Stormwater Drainage,

Less Than Significant Impact. Refer to Response 4.10c concerning drainage patterns and stormwater drainage systems. As discussed in Response 4.10c, the Project proposes on-site drainage improvements. No off-site drainage improvements are proposed. The environmental effects associated with the proposed drainage improvements are analyzed throughout this Initial Study. As concluded in this Initial Study, the drainage improvements' environmental effects would be less than significant, following compliance with the established regulatory framework.

i. Electric Power, Natural Gas, and Telecommunications.

Less Than Significant Impact. Electrical power is provided by SCE and natural gas is provided by SoCalGas. Telecommunications are provided by various companies. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure in the Project area, which currently serves the Project site. Refer to Responses 4.6a and 4.6b for further discussions concerning electricity and natural gas usage. The Project's anticipated electricity demand would be approximately 678,897 kWh per year. The Project's anticipated natural gas demand would be approximately 1,830,807 cf per year. The Project proposes to connect to existing electrical, natural gas, and telecommunications infrastructure, and no off-site improvements are proposed. The environmental effects associated with the necessary on-site electrical, natural gas, and telecommunications improvements are analyzed throughout this Initial Study. As concluded in this Initial Study, the electric power, natural gas, and telecommunications improvements' environmental effects would be less than significant, following compliance with the established regulatory framework.

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

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

The GGP designates the Project site General Commercial with a MUO. The General Commercial designation provides for a wide range of larger-scale commercial uses to serve both the needs of the City and the region. The MUO designation permits residential development on selected areas designated for commercial and industrial land uses. As discussed in detail in Response 4.3a, the Project proposes residential and commercial land uses, which would be below the General Commercial with a MUO designations' maximum allowable intensity/density, with fewer DU (approximately 31 percent less population) and less commercial floor area. The Project's proposed land uses would be consistent with/less than allowed under the GGP's land use designations, which are the basis for the UWMP. Therefore, the Project's forecast population growth and water demand would be consistent with the UWMP's assumptions for the Project site. Further, 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 Rosecrans Avenue.[73] 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 AFY is expected to decrease due to further water use efficiency and recycled water programs.[74]

The Project proposes on-site water improvements and one connection (at the site's primary entrance) to an existing 18-inch water main in Rosecrans Avenue. No off-site water improvements are proposed. The environmental effects associated with the proposed water improvements are analyzed throughout this Initial Study. As concluded in this Initial Study, the water improvements' environmental effects would be less than significant, following compliance with the established regulatory framework.

4.19c Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project projected demand in addition to the provider's existing commitments?

Less Than Significant Impact.

Wastewater Generation and Infrastructure

The Project site is within the jurisdictional boundaries of Sanitation Districts of Los Angeles County Sanitation District No. 5 (LACSD). The Project's wastewater would discharge to the local sewer line for conveyance to a LACSD's trunk sewer. Access to the LACSD sanitary sewer system would be provided with connection to a local sewer line, which is maintained by the City, for conveyance to the District's East Rosecrans Avenue Trunk Sewer Section 1, located in Rosecrans Avenue east of Van Ness Avenue. The LACSD's 18-inch diameter trunk sewer has a capacity of 2.5

[73] J. Zhao, P.E., PhD., Personal Communication - *Will Serve Letter*, September 20,2019.

[74] Golden State Water Company. (2016). *2015 Urban Water Management Plan – Southwest*. Rancho Cordova, CA: Kennedy/Jenks Consultants.

million gallons per day (mgd) and conveyed a peak flow of 0.1 mgd when last measured in 2017. The Project's wastewater flow is estimated at approximately 22,825 gpd, which would increase the overall downstream system by approximately 0.009 percent.

Therefore, the Project's effluent peak flow rates and volumes would not significantly impact or exceed the existing sewer capacity in the public sewer system or the existing sanitary sewer lift station. A less than significant impact would occur in this regard, and no mitigation is required.

The Project proposes on-site wastewater improvements and one connection to an existing 18-inch line within Rosecrans Avenue, south of the Project. No off-site wastewater improvements are proposed or required. The environmental effects associated with the proposed wastewater improvements are analyzed throughout this Initial Study. As concluded in this Initial Study, the wastewater improvements' environmental effects would be less than significant, following compliance with the established regulatory framework.

Wastewater Treatment

The wastewater generated by the proposed Project would be treated at LACSD's 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 261.1 mgd. The Project would generate 0.03 cfs (22,825 gpd) of wastewater.[75] The HSC empowers the LACSD to charge a fee for the privilege of connecting to the LACSD's 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. Additionally, the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities.

4.19d Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

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

Less Than Significant Impact. Waste Resources of Gardena ("Waste Resources") provides solid waste and recycling services for the City's residential, commercial, and industrial customers. Waste Resources 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, 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 on-site structures and surface parking lot and in their place construct a mixed-use development consisting of 113 DU, including 15 live-work units with 3,949 SF of work space. State law requires a 65 percent diversion rate for construction and demolition (C&D) projects. The Gardena City Council adopted Ordinance No. 1797 to comply with State law. Each C&D project for which a Building/Demolition Permit is applied for and approved

[75] County of Los Angeles. 2019. Will Serve Letter for Rosecrans and Van Ness Residential Project

must achieve the waste diversion performance standard or show a good faith effort to achieve that standard. Thus, the Project would be subject to compliance with Ordinance No. 1797, which would achieve compliance with State law.

Project implementation would increase solid waste disposal demands over existing conditions. 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 capacity is approximately 8.6 million CY and maximum capacity is approximately 63.9 million CY, respectively.[76] Thus, the Project would be served by a landfill with sufficient remaining permitted capacity to accommodate the Project's solid waste disposal needs. 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 subject to compliance with all applicable federal, State, and local statutes and regulations for solid waste, including those identified under CALGreen and AB 939. In 2018, all projects subject to the City's diversion program met or exceeded the 65 percent requirement. The Project would result in less than significant impacts concerning solid waste, and no mitigation is required.

[76] 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/.

4.20 Wildfire

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X
Source: Kimley-Horn & Associates				

Impact Analysis

4.20a Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. According to CalFire Fire Hazard Severity Zone Map for the City, the Project site is not within a State Responsibility Area. The Project site is in a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) within a local responsibility area.[77] Project design and site access would adhere to LACFD regulations and designs. Further, Project construction would not require the complete closure of any public or private streets during construction. Temporary construction activities would not impede use of the streets for emergencies or access for emergency response vehicles. Therefore, the Project would not result in inadequate emergency access, and no impact would occur.

4.20b Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

[77] CalFire. (November 2007). *Los Angeles County FHSZ Map.* Retrieved from https://osfm.fire.ca.gov/media/7280/losangelescounty.pdf

No Impact. As discussed above, the Project is not within an area classified as VHFHSZ. Therefore, no impacts would occur.

4.20c Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. As discussed above, the Project is not within an area classified as VHFHSZ. The Project site is surrounded by development in an urbanized area of the City. The Project would tie into existing infrastructure that currently serves the Project site. Project implementation would not result in the construction, installation, or maintenance of new infrastructure. No impact would occur.

4.20d Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project is not within an area classified as VHFHSZ. The Project site and surrounding vicinity are relatively flat. There are no known landslides near the site nor is the site in the path of any known or potential landslides. Therefore, no impacts would occur.

4.21 Mandatory Findings of Significance

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Does the Project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	
Source: Kimley-Horn & Associates				

Impact Analysis

4.21a Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact With Mitigation Incorporated. As discussed throughout this Initial Study, the Project does not have the potential to degrade the environment's quality or result in significant environmental impacts that cannot be reduced to less than significant following compliance with the established regulatory framework (i.e., 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. As also concluded in **Section 4.5**, following compliance with MM TCR-1 and TCR-2, potential impacts to archaeological resources would be reduced to less than significant.

As concluded in **Section 4.18**, the Project could cause an adverse change in the significance of a tribal cultural resource, unless mitigated. Following compliance with MM TCR-1 and TCR-2, potential impacts to tribal cultural resources would be reduced to less than significant.

4.21b Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. The proposed Project would result in significant impacts unless mitigated for the following environmental issues: biological resources, cultural resources, transportation, and tribal cultural resources. The impacts associated with these resource areas are localized, thus, would not result in cumulative impacts. A Mitigation Program has been prepared for each of these environmental issue areas to reduce impacts to less than significant. The City would also impose COAs on 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 4.3d and 4.8b. Therefore, the proposed Project, in conjunction with other future projects, would not result in any cumulatively considerable impacts, and no mitigation is required.

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

Less Than Significant Impact. As discussed in the respective sections, the proposed Project would have no potentially significant impacts. The City would impose COAs 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

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