EVERGREEN RESIDENTIAL PROJECT

PUBLIC REVIEW DRAFT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
SEPTEMBER 2020

Prepared for:

City of Gardena
Community Development Department
Development Services
1700 West 162nd Street
Gardena, CA 90247

Prepared by:

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D e N o v o P l a n n i n g G r o u p

A Land Use Planning, Design, and Environmental Firm

EVERGREEN RESIDENTIAL PROJECT

Public Review Draft

Initial Study/Mitigated Negative Declaration

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September 2020

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1.0 INTRODUCTION

1.1 Statutory Authority and Requirements

This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Sections 21000, et seq.) and the State CEQA Guidelines (14 California Code of Regulations Title 14 Sections 15000, et seq.). This Initial Study is an informational document intended to be used as a decision-making tool for the Lead Agency and responsible agencies in considering and acting on the proposed Project.

Pursuant to CEQA Guidelines Section 15063, the City, as Lead Agency, has prepared this Initial Study to determine if the proposed Evergreen Residential Project (Project) would have a significant effect on the environment. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that mitigation cannot reduce the impact to a less than significant level for any aspect of the proposed Project, then the Lead Agency must prepare an Environmental Impact Report (EIR) to analyze project-related and cumulative environmental impacts. Alternatively, if the Lead Agency finds that there is no evidence that the proposed Project as proposed may cause a significant effect on the environment, the Lead Agency may prepare a Negative Declaration (ND). If the Lead Agency finds that there is evidence of a significant impact, but the impact can be reduced through mitigation, the Lead Agency may prepare a Mitigated Negative Declaration (MND). Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such significant environmental impacts may occur (PRC Section 21080(c)).

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

1. Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR, MND or a ND;
2. Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a ND;
3. Assist in the preparation of an EIR, if one is required, by;
    a. Focusing the EIR on the effects determined to be significant,
    b. Identifying the effects determined not to be significant,
    c. Explaining the reasons for determining that potentially significant effects would not be significant, and
    d. Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environment effects.
4. Facilitate environmental assessment early in the design of a project;
5. Provide documentation of the factual basis for the finding in a MND or ND that a project will not have a significant effect on the environment;
6. Eliminate unnecessary EIRs; and
7. Determine whether a previously prepared EIR could be used with the project.

The environmental documentation, which is ultimately selected by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon the proposed Project. The resulting environmental documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

1.2 Summary of Findings

Pursuant to State CEQA Guidelines Section 15367, the City of Gardena (City), as the Lead Agency, has the authority for environmental review and adoption of the environmental documentation, in accordance with CEQA. As set forth in State CEQA Guidelines Section 15070, an Initial Study leading to a Negative Declaration (IS/ND) or Mitigated Negative Declaration (IS/MND) can be prepared when:

- The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment (resulting in a Negative Declaration), or

- The Initial Study identifies potentially significant effects, but:
    - Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
    - There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment (resulting in a Mitigated Negative Declaration).

Based on the Environmental Checklist Form and supporting environmental analysis provided in Section 4.0, Environmental Analysis, the proposed 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:

- Cultural Resources;
- Geology and Soils; and
- Tribal Cultural Resources.

1.3 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 Section 15073. During the public review period, the IS/MND, including the technical appendices, was made available for review at the following location:

- City of Gardena Website: https://www.cityofgardena.org/community-development/planning-projects/

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

Written comments on this IS/MND may be sent to:

John F. Signo, AICP
Senior Planner
City of Gardena, Community Development Department
1700 West 162nd Street
Gardena, CA 90247-3730
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, and if further documentation may be required. If no new environmental issued have been raised 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 Section 15150, a 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 were utilized during preparation of this Initial Study. Copies of these documents are available for review on the City's website (http://www.cityofgardena.org/) unless otherwise noted.

City of Gardena General Plan 2006, adopted April 25, 2006. The City adopted the comprehensive *Gardena General Plan 2006* (General Plan) in 2006. Subsequently, the Community Development Element's Land Use Plan was updated in June 2012 and February 2013, and the Circulation Plan was updated in July 2020. The 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 Gardena General Plan is comprised of the following Elements and Plans:

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

    - Noise Plan
- Implementation
    - Implementation Program

The General Plan constitutes the City's overall plans, goals, and objectives for land use within the City's jurisdiction. The General Plan 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 General Plan serves as a decision-making tool to guide future growth and development decisions.

City of Gardena General Plan 2006 Final Environmental Impact Report, SCH No. 2005021125, April 2006. The *City of Gardena General Plan 2006 Final Environmental Impact Report* (General Plan FEIR) analyzed the potential environmental impacts that would result from implementation of the Gardena General Plan. The General Plan FEIR forecast 22,329 dwelling units, approximately 18.9 million square feet of nonresidential land uses and a resulting population of 63,799 persons at the City's buildout. Buildout was estimated to occur over 20 years. The General Plan FEIR concluded significant and unavoidable impacts concerning Transportation and Traffic.

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

Gardena Municipal Code. The Gardena Municipal Code regulates municipal affairs within the City's jurisdiction including, without limitation, zoning regulations (codified in Gardena Municipal Code Title 18). The Municipal Code is the primary method used for implementing the General Plan's Goals, Objectives, and Policies. Gardena Municipal Code Title 18, Gardena Zoning Law, specifies the rules and regulations for construction, alteration and building of structures within the City.

1.5 Report Organization

This document is organized into the following sections:

Section 1.0, Introduction, provides the CEQA Statute and Guidelines applicable to the Initial Study, summarizes the findings of the Initial Study, describes the public review process, and identifies documents incorporated by reference as part of the Initial Study.

Section 2.0, Project Description, provides a detailed description of the proposed Project, including Project location, environmental setting, Project characteristics, construction program and phasing, and requested entitlement, permits and approvals.

Section 3.0, Environmental Checklist Form, provides Project background information and a summary of environmental factors potentially affected by the proposed Project and the Lead Agency Determination based on the analysis and impact determinations provided in Section 4.0. The impact evaluation criteria utilized in Section 4.0 is also provided.

Section 4.0, Environmental Analysis, provides a detailed analysis of the environmental impacts identified in the environmental checklist, and identifies mitigation measures, if necessary.

Section 5.0, References, identifies the information sources utilized in preparation of the IS to support the environmental analysis.

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2.0 PROJECT DESCRIPTION

2.1 Project Location

The Evergreen Residential Project (Project) site is located in the City of Gardena within the County of Los Angeles; refer to Exhibit 2-1, *Regional Vicinity*. The Project site is located in the easternmost portion of the City, at 13615, 13619, and 13633 Vermont Avenue; Vermont Avenue serves as the City's jurisdictional limits with the City of Los Angeles. The Project site is comprised of four parcels (APNs 6115-019-042, 43, 44, and 45) totaling approximately 4.23 gross acres; refer to Exhibit 2-2, *Project Location*.

Regional access to the site is provided via the Harbor Freeway (Interstate [I] 110) to the east, the Artesia Freeway (SR-91) to the south, and the Glen Anderson Freeway (I-105) to the north of the site. Local access to the site is provided directly from Vermont Avenue. Within the Project area, Vermont Avenue is accessible from West 135th Street and El Segundo Boulevard to the north and Rosecrans Avenue to the south. There are currently four driveways providing access to the Project site from Vermont Avenue.

2.2 Existing Setting

ON-SITE LAND USES

The Project site is a relatively flat rectangular shaped property ranging from 71 to 80 feet above mean sea level, descending to the southwest.[1] The site is currently developed with an 11-room motel (Moneta Motel) in the northeastern corner of the site and a retail garden center and commercial container nursery (Moneta Nursery Garden Center), which comprises the remainder of the site.

The motel portion of the site contains an approximately 3,100 square foot single-story structure with surface parking located immediately adjacent. The motel site is surrounded by chain-link fencing on the north, west, and south. An iron fence with retractable gate is located along the eastern portion of the site, adjacent to Vermont Avenue.

The nursery portion of the site contains an approximately 3,000-square-foot retail garden center and surface parking within the eastern portion of the site, adjacent to Vermont Avenue. The remainder of the site consists of rows of nursery containers/planter beds with a variety of plants and trees and an approximately 4,800-square-foot greenhouse structure. An iron fence with retractable gates is located along the eastern portion of the site, adjacent to Vermont Avenue.

GENERAL PLAN AND ZONING

According to the City of Gardena Land Use Map (General Plan Land Use Element Figure LU-2), the Project site is designated General Commercial. The General Commercial land use designation provides for a wide range of larger scale commercial uses to serve both the needs of the City and the region. It is intended for commercial uses such as regional retail, automobile dealerships, supermarkets, junior department stores, financial centers, professional offices, restaurants, and other commercial uses oriented to the traveling public. The maximum permitted floor area ratio (FAR) is 0.5.

[1] C&V Consulting, Inc., *Preliminary Hydrology Study Tentative Tract Map No. 83037*, March 2020.

Legend

Project Location/
Gardena City Boundary

County Boundary

Sources: CalAtlas; Los Angeles County. Map date: April 30, 2020.

N

0 2½ 5

Miles

CITY OF GARDENA - EVERGREEN RESIDENTIAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Exhibit 2-1
Regional Vicinity Map

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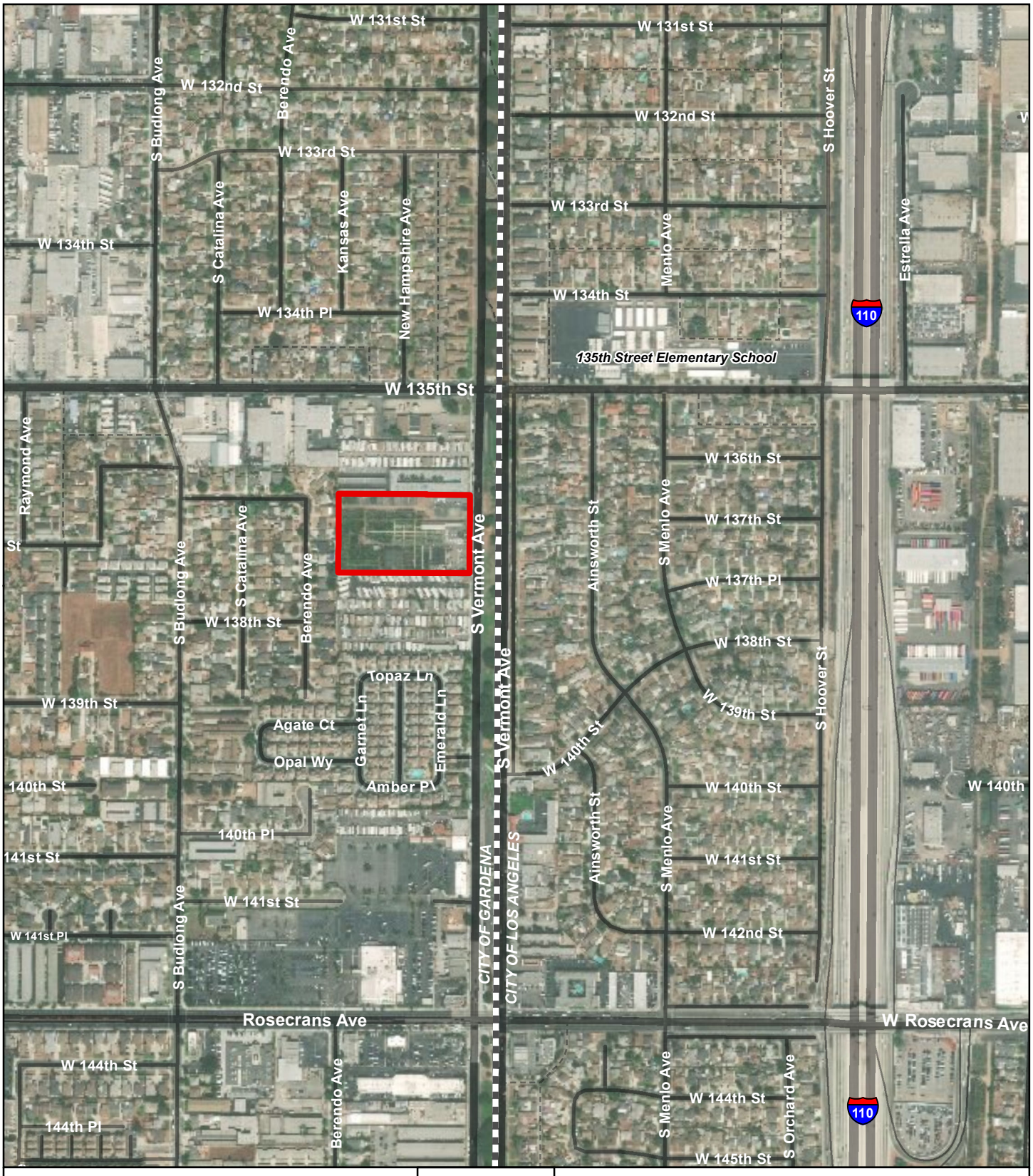
A Land Use Planning, Design, and Environmental Firm



Legend

- Project Boundary
- City Boundary

0 200 400
Feet

Sources: Los Angeles County; ArcGIS Online World Imagery Map Service; Google Maps. Map date: May 2, 2020.

CITY OF GARDENA - EVERGREEN RESIDENTIAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Exhibit 2-2
Project Location

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The City of Gardena Zoning Map identifies the zoning for the Project site as General Commercial (C-3). The Gardena Municipal Code, Chapter 18.32, *General Commercial Zone (C-3)*, states the C-3 zone is intended for general commercial uses and identifies the permitted uses and property development standards for properties within the C-3 zone.

SURROUNDING USES

Uses surrounding the Project site include:

- North: Directly north of the Project site is a multi-family use (The Oasis Apartments). Beyond the apartment complex are mobile home uses. Areas to the north are zoned C-3.

- East: The Project site is bounded on the east by Vermont Avenue. North and southbound travels lanes on Vermont Avenue are divided by a landscaped median approximately 65 feet wide, which is shared with the City of Los Angeles. Adjacent to the site, Vermont Avenue provides three southbound travel lanes with curbside parking. East of the landscape median, three northbound travel lanes, an on-street bicycle lane, and parking are provided. Residential uses, within the City of Los Angeles, are located east of Vermont Avenue and east of a landscape median and frontage road.

- South: Mobile home uses (Villa Vermont Mobile Homes) are located immediately south of the Project site. South of the mobile home uses are single-family residential uses. Areas to the south are zoned C-3 and Carnelian Specific Plan, respectively.

- West: Single-family residences are located immediately west of the Project site. Areas to the west are zoned Single-Family Residential (R-1).

2.3 Project Characteristics

The Project Applicant requests approval of the proposed Evergreen Residential Project. The Project includes a General Plan Amendment (GPA) #2-20, Zone Change (ZC) #2-20, Tentative Tract Map (TTM) #2-20 (TTM No. 83037), and Site Plan Review (SPR) #3-20 to allow development of a residential community consisting of 84 townhomes, including two affordable units, as further described below.

PROPOSED RESIDENTIAL DEVELOPMENT

The Project proposes to remove all existing on-site improvements within the 4.23-gross acre site and construct 84 three-story attached townhomes in 16 buildings (182,206 square feet; 20.24 dwelling units/net acre); refer to Exhibit 2-3, *Proposed Site Plan*. Each building would contain four to six dwelling units and have a maximum height of 40 feet (to roof ridge). The townhomes would consist of a mix of floor plans with two- to four-bedroom options, ranging in size from 1,528 to 1,801 square feet, with the exception of two units which would be 833 square feet with one bedroom and a den. These two units would be restricted as affordable for a period of 30 years.

The Project proposes a seven-foot screen wall or screen/retaining combination wall along the northern, southern, and western perimeters of the site. Along the site's frontage, a six-foot split-face wall is proposed with five-foot six-inch steel fencing interspersed where the interior private driveways terminate within the site; refer to Exhibit 2-3 and the Site Access discussion below.

Open Space and Recreational Amenities

Approximately 56,256 square feet of open space is proposed including 5,550 square feet within private balconies and 50,706 square feet within common open space areas. A central recreational area is proposed within the center of the site and would include a swimming pool, sun deck, restroom facility, BBQ bar with trellis and sitting area, which would be contained in a fenced enclosure. Pool equipment would be enclosed within the restroom building. Adjoining the pool facilities would be a tot play structure, lawn area and covered BBQ area with tables; refer to Exhibit 2-4, *Proposed Recreational Area*.

Landscaping and Walkways

Approximately 10,758 square feet of additional landscaping, not counted in the open space and recreational amenity areas, would be provided throughout the site; refer to Exhibit 2-5, *Conceptual Landscape Plan*. A variety of trees, shrubs and ground cover would be provided along the perimeter of the site, adjacent to and between the residential buildings, within and around the community open space area, and near the parking areas. Natural colored walkways are proposed throughout the site to provide access to the townhomes, parking areas, and central community open space area.

Parking

Gardena Municipal Code Section 18.40.040, *Number of Parking Spaces Required*, states that multiple-family dwellings require two spaces in a garage or enclosed parking facility per dwelling unit. In addition, Section 18.040.070, *Additional Standards for Residential Parking Areas*, requires guest parking be provided for residential developments of more than one unit at one-half parking space per dwelling unit.

The Project would require two enclosed spaces for each of the 82 market rate units and one enclosed space for each of the 2 affordable units for a total of 166 enclosed spaces. An additional 41 guest spaces would be required based on the market rate units.

The Project proposes attached two car garages for the 82 two- to four-bedroom (market rate) units and attached single-car garages for the one-bedroom (affordable) units. An additional 42 open parking stalls (including four ADA spaces) would be distributed throughout the site.

Site Access

Access to the Project site is proposed from a single right in right out only driveway on Vermont Avenue, at the southeast corner of the site. The entrance would be gate-controlled with a visitor kiosk (telephone keypad) and include decorative paving and landscaping. Pedestrian access would be provided through a locked access gate, north of the proposed driveway. A private interior driveway system, consistent with Los Angeles County Fire access requirements, would provide access to the individual townhome units; refer to Exhibit 2-3.

Architecture

The Project proposes four building types; refer to Exhibits 2-6 through 2-9, *Building Elevations*. The buildings would primarily be stucco with composite shingle roofing, vertical metal railings, vinyl windows, and decorative elements such as stucco overhangs, light fixtures and metal grilles. The Project proposes a different, but complimentary color scheme, for each building type to provide visual interest and reduce monotony.

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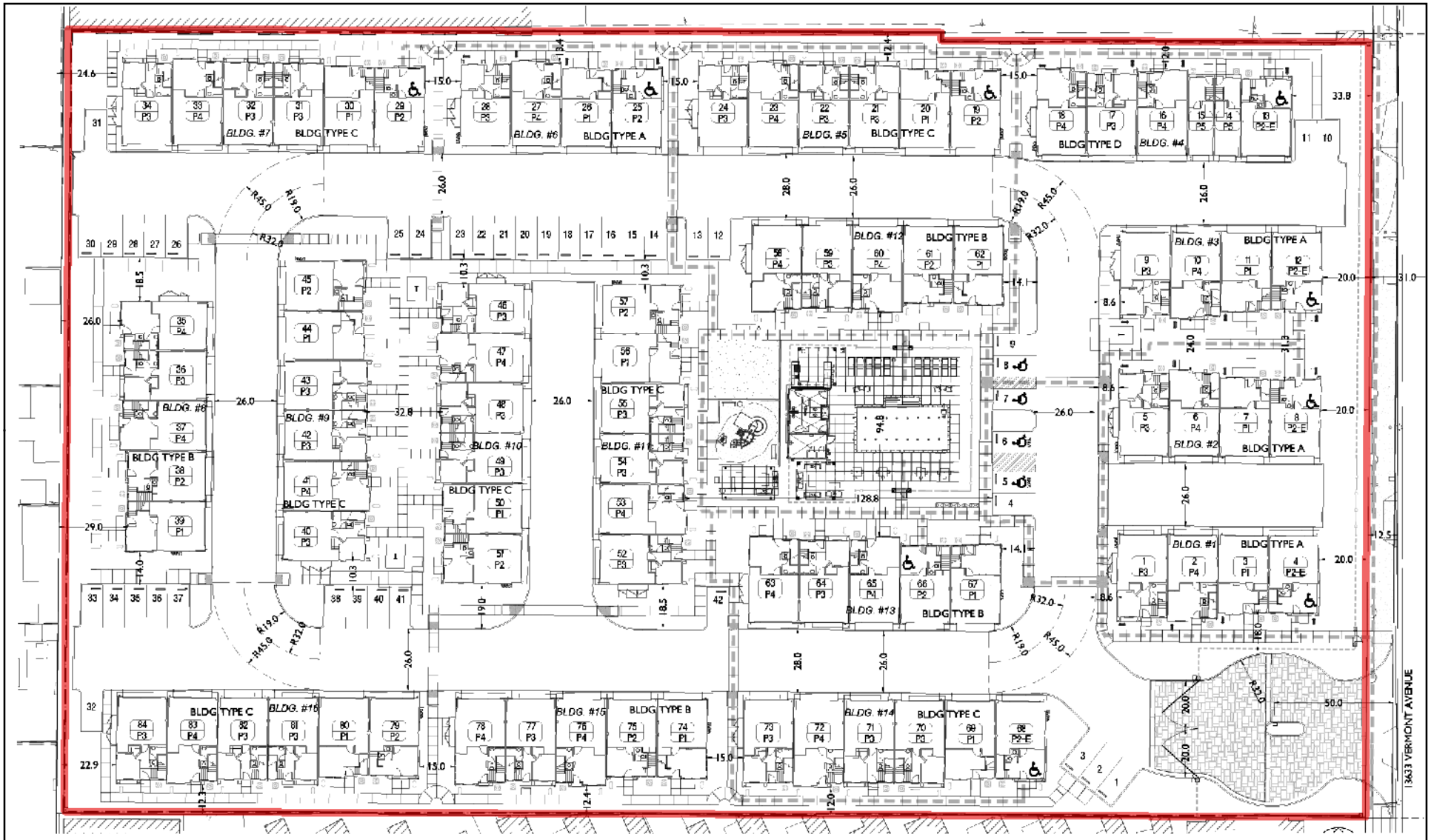

Legend

Project Boundary

N

0 25 50

Feet

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Exhibit 2-3
Proposed Site Plan

Source: Melia Homes, SUMA Architecture, August 31, 2020. Map date: September 8, 2020.

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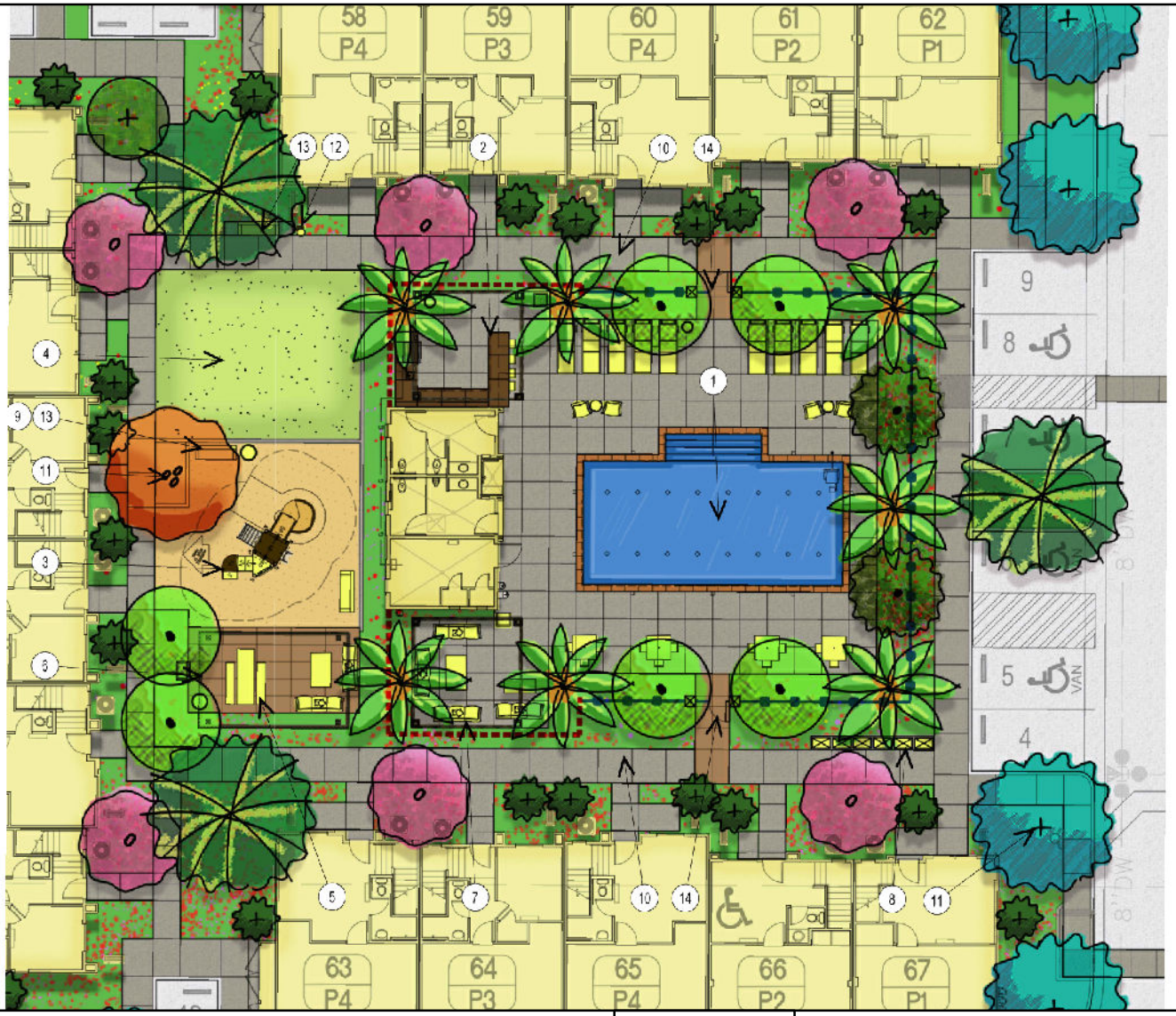

Legend

1. Swimming pool, chaise lounges, concrete deck
2. Shade structure, entertainment counter, BBQ grill, bar seating
3. Play structure with rubberized mulch surface
4. Lawn area for passive play
5. Accessibile picnic tables
6. Shade structure with freestanding BBQ grill
7. Shade structure with lounge seating
8. Mailboxes, final locations pending USPS approval
9. Trash receptacle
10. 5' wide community concrete sidewalk
11. Proposed tree
12. Dog waste station
13. Park bench
14. ADA compliant pedestrian gate

Source: Melia Homes, September 1, 2020. Map date: September 8, 2020.

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Exhibit 2-4
Proposed Common Open Space

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Legend

1. Central community open space
2. 6' wide walkway
3. Six community cluster mailboxes
4. Proposed wall, gate, or fence
5. Enchanced stamp concrete paving
6. Proposed tree
7. 5' wide community sidewalk
8. 4' wide unit entry
9. Accessible parking stall/striping
10. Guest parking stall and drive lane
11. Concrete driveway
12. Common area landscape
13. Community dog bag station
14. Property line/ROW
15. Public street curb and sidewalk
16. Transformer
17. Vertical metal mesh wall for plants
18. Main vehicular entrance/visitor kiosk

N

0 25 50

Feet

Source: Melia Homes, September 1, 2020. Map date:September 8, 2020.

CITY OF GARDENA - EVERGREEN RESIDENTIAL
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Exhibit 2-5
Conceptual Landscape Plan

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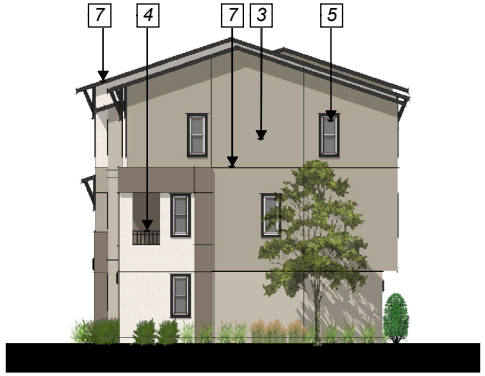
VERMONT AVE. ELEVATION

LEFT ELEVATION

FRONT ELEVATION



RIGHT ELEVATION

REAR ELEVATION

Material Schedule

1. Roof - composite shingle roof
2. Fascia - 2x6 resawn wood
3. Wall - exterior light dash finish stucco
4. Railing - vertical metal
5. Vinyl Window w/stucco O/E.P.S trim
6. Decorative Brace
7. Stucco reglet
8. Decorative light fixture
9. Stucco eyebrow overhang
10. Decorative metal grille
11. Utility closet - see site plan for location

Source: Melia Homes, SUMA Architecture, May 8, 2020. Map date: May 8, 2020.

CITY OF GARDENA - EVERGREEN RESIDENTIAL
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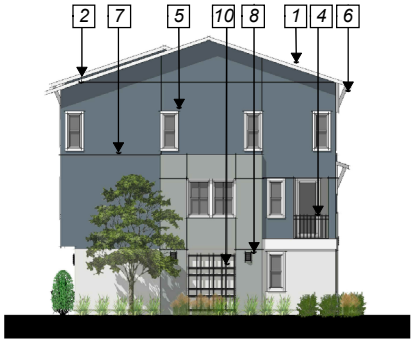
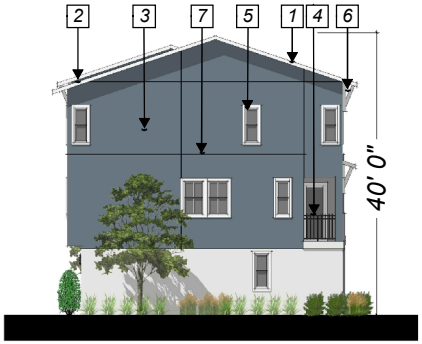
Exhibit 2-6
Proposed Elevations - Building A



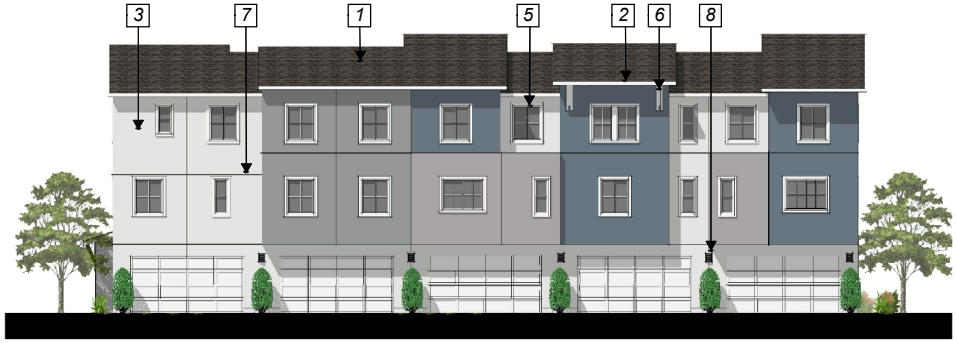
VERMONT AVE. ELEVATION



LEFT ELEVATION

FRONT ELEVATION

RIGHT ELEVATION



REAR ELEVATION

Material Schedule

1. Roof - composite shingle roof
2. Fascia - 2x6 resawn wood
3. Wall - exterior light dash finish stucco
4. Railing - vertical metal
5. Vinyl Window w/stucco O/E.P.S trim
6. Decorative Brace
7. Stucco reglet
8. Decorative light fixture
9. Stucco eyebrow overhang
10. Decorative metal grille
11. Utility closet - see site plan for location

Source: Melia Homes, SUMA Architecture, May 8, 2020. Map date: May 8 2020.

CITY OF GARDENA - EVERGREEN RESIDENTIAL
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Exhibit 2-7
Proposed Elevations - Building B

LEFT ELEVATION

FRONT ELEVATION

RIGHT ELEVATION

REAR ELEVATION

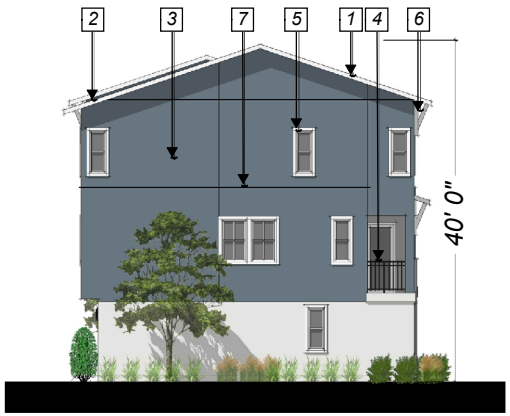
Material Schedule

1. Roof - composite shingle roof
2. Fascia - 2x6 resawn wood
3. Wall - exterior light dash finish stucco
4. Railing - vertical metal
5. Vinyl Window w/stucco O/E.P.S trim
6. Decorative Brace
7. Stucco reglet
8. Decorative light fixture
9. Stucco eyebrow overhang
10. Decorative metal grille
11. Utility closet - see site plan for location

Source: Melia Homes, SUMA Architecture, May 8, 2020. Map date: May 8, 2020.

CITY OF GARDENA - EVERGREEN RESIDENTIAL
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Exhibit 2-8
Proposed Elevations - Building C



LEFT ELEVATION

FRONT ELEVATION

VERMONT AVE. ELEVATION

REAR ELEVATION

Material Schedule

1. Roof - composite shingle roof
2. Fascia - 2x6 resawn wood
3. Wall - exterior light dash finish stucco
4. Railing - vertical metal
5. Vinyl Window w/stucco O/E.P.S trim
6. Decorative Brace
7. Stucco reglet
8. Decorative light fixture
9. Stucco eyebrow overhang
10. Decorative metal grille
11. Utility closet - see site plan for location

Source: Melia Homes, SUMA Architecture, May 8, 2020. Map date: May 8, 2020.

CITY OF GARDENA - EVERGREEN RESIDENTIAL
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Exhibit 2-9
Proposed Elevations - Building D

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INFRASTRUCTURE AND PUBLIC SERVICES

Water

Golden State Water Company (GSWC) provides water service to the site. The Project proposes to install 8-inch water lines within the private drives with two connections to an existing 12-inch water main within Vermont Avenue.

Wastewater

The City of Gardena conveys wastewater to the County Sanitation Districts of Los Angeles County's regional system for treatment. The Project proposes to install 8-inch sewer lines within the private drives that would connect to a proposed 8-inch sewer line within a proposed private easement located between two properties west of the site in order to connect to the existing 8-inch sewer line in Berendo Avenue.

Stormwater

The Project site would be graded to allow for a single low point on the site equipped with a curb inlet catch basin. The catch basin is proposed to be located at the end of the drive aisle at the southwestern property line and would be connected to a proposed drywell system for treatment and infiltration. Two additional curb inlet catch basins would be located on-site in a flow-by condition to reduce the amount of stormwater flowing into the sump location. The storm drain system would also have a detention system to capture excess flows generated by the proposed Project conditions. Section 4.10, Hydrology and Water Quality, provides additional information on the Project's proposed hydrology and drainage.

REQUESTED ENTITLEMENTS

The Project requests approval of the following entitlements:

- General Plan Amendment (GPA) #2-20 to change the General Plan land use designation of the site to High Density Residential;
- Zone Change (ZC) #2-20 to change zoning of the site to High Density Multiple-Family Residential Zone (R-4);
- Tentative Tract Map (TTM) #2-20 (TTM No. 83037) to create a subdivision for Condominium Purposes; and
- Site Plan Review #3-20 to approve the proposed Site Plan.

PROJECT CONSTRUCTION AND PHASING

Project construction is anticipated to begin in January 2021 and end in January 2022. Construction activities would include demolition, site preparation, grading, building construction, and paving, architectural coating, and landscaping.

2.4 Permits and Approvals

The City of Gardena, as the 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 the proposed Project, at a minimum, the following discretionary permits/approvals must be granted by the City and others:

- Environmental Assessment (EA) #5-20;
- General Plan Amendment (GPA) #2-20;
- Zone Change (ZC) #2-20;
- Tentative Tract Map #2-20 (TTM No. 83037);
- Site Plan Review (SPR) #3-20; and
- Los Angeles Regional Water Quality Control Board – National Pollutant Discharge Elimination System (NPDES) Compliance/Low Impact Development (LID) approvals.

3.0 ENVIRONMENTAL CHECKLIST FORM

Background

1. Project Title: Evergreen Residential Project
2. Lead Agency Name and Address: City of Gardena Community Development Department 1700 West 162nd Street Gardena, California 90247
3. Contact Person and Address: John F. Signo, AICP Senior Planner City of Gardena, Community Development Department 1700 West 162nd Street Gardena, California 90247 Email: jsigno@cityofgardena.org
4. Project Location: 13615, 13619, and 13633 Vermont Avenue, Gardena, California
5. Project Sponsor's Name and Address: Mr. Chad Brown, Vice President of Planning and Development Melia Homes 8951 Research Drive Irvine, California 92618
6. General Plan Designation: General Commercial
7. Zoning: General Commercial (C-3)
8. Description of the Proposed Project: See Section 2.3.
9. Surrounding Land Uses and Setting: See Section 2.2.
10. Other public agencies whose approval is required: Los Angeles County Sanitation District; Los Angeles County 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 Section 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.? In compliance with AB 52, the City distributed letters to applicable Native American tribes informing them of the Project on June 10 and June 17, 2020. Two California Native American tribes, the Gabrielino Tongva Tribe and the Gabrieleno Band of Mission Indians – Kizh Nation, have requested consultation; refer to Response 4.18.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this 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		Agriculture and Forestry Resources		Air Quality
	Biological Resources	X	Cultural Resources		Energy
X	Geology and Soils		Greenhouse Gasses		Hazards and Hazardous Materials
	Hydrology and Water Quality		Land Use and Planning		Mineral Resources
	Noise		Population and Housing		Public Services
	Recreation		Transportation	X	Tribal Cultural Resources
	Utilities and Service Systems		Wildfire	X	Mandatory Findings of Significance

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.
X	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.
	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 impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

CITY OF GARDENA

Raymond Barragan
Community Development Manager

September 14, 2020
Date

Evaluation of Environmental Impacts

The environmental analysis in this section is patterned after CEQA Guidelines Appendix G. An explanation is provided for all responses with the exception of "No Impact" responses, which are supported by the cited information sources. The responses consider the whole action involved, including on- and off-site project level and cumulative, indirect and direct, and short-term construction and long-term operational impacts. The evaluation of potential impacts also identifies the significance criteria or threshold, if any, used to evaluate each impact question. If applicable, mitigation measures are identified to avoid or reduce the impact to less than significant. There are four possible responses to each question:

- Potentially Significant Impact. This response is appropriate when there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries, upon completion of the Initial Study, an EIR is required.

- Less than Significant With Mitigation Incorporated. This response applies when the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.

- Less than Significant Impact. A less than significant impact is one which is deemed to have little or no adverse effect on the environment. Mitigation measures are, therefore, not necessary, although they may be recommended to further reduce a minor impact.

- No Impact. These issues were either identified as having no impact on the environment, or they are not relevant to the project.

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4.0 ENVRIONMENTAL ANALYSIS

4.1 Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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. In non-urbanized areas, 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	

Public Resources Code section 21099 relates to projects in a Transit Priority Area which is defined as an area within ½ mile of a major transit stop. Section 21099(d) provides that aesthetic and parking impacts of a residential project on an infill site within a transit priority area shall not be considered significant impacts on the environment. The Project site is located within a Transit Priority Area consequently, the aesthetic and parking impacts of the Project cannot be considered significant impacts pursuant to CEQA. The analysis of aesthetic impacts below is presented for disclosure purposes.

a) Have a substantial adverse effect on a scenic vista?

No Impact. The Gardena General Plan does not identify any scenic vistas or scenic resources within the City. The Project site and surrounding area are relatively flat and due to the topography and intervening structures associated with urbanization of the area, there are no expansive views or scenic vistas. The Project would not have a substantial adverse effect on a scenic vista.

Mitigation Measures: No mitigation measures are required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Project area is developed and does not contain any scenic resources. There are no State or County designated scenic highways.[2] Additionally, the Gardena General Plan does not identify any scenic highways within the City. The Project would not substantially damage scenic resources within a state scenic highway.

Mitigation Measures: No mitigation measures are required.

c) In non-urbanized areas, 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?

Less Than Significant Impact. The Project site is located within an urbanized area and is currently developed with a motel and a retail garden center and commercial container nursery. The surrounding area is developed, comprised primarily of residential uses to the north, south and west. East of the Project site and Vermont Avenue are also residential uses within the City of Los Angeles. The Project proposes to remove existing on-site improvements and construct 84 three-story attached townhomes in 16 buildings at a maximum height of 40 feet (to roof ridge). The Project includes a General Plan Amendment (GPA), Zone Change (ZC), Tentative Tract Map (TTM), and Site Plan Review (SPR) to allow development of the residential community.

The Project would be subject to the requirements of Gardena Municipal Code Section 18.18.020, *Development Standards*, which addresses development within the proposed High Density Multiple-Family Residential Zone (R-4). Section 18.18.020 establishes standards for density, landscaping, building height and parking within the R-4 zone. Additionally, the Project would be required to comply with Gardena Municipal Code Chapter 18.42, *General Provisions*, which addresses residential open space; fences, hedges and walls; setbacks; residential design criteria; security and lighting plans, and pedestrian amenities, amongst others.

As part of the City's Site Plan Review process required under Gardena Municipal Code Chapter 18.44, *Site Plan Review*, the Project site plan would be reviewed and only approved after finding the proposed development, including the uses and the physical design of the development is consistent with the intent and general purposes of the General Plan and provisions of the Gardena Municipal Code, and will not adversely affect the orderly and harmonious development of the area (Gardena Municipal Code Section 18.44.030, *Factors for Approval*). Although the Gardena Municipal Code does not identify specific regulations governing scenic quality, the review process would ensure the physical design of the proposed Project is consistent and compatible with the site and surrounding area. Thus, the Project would not conflict with applicable zoning and other regulations governing scenic quality.

[2] California Department of Transportation, Scenic Highway System Lists, *List of Eligible and Officially Designated State Scenic Highways* and *List of Officially Designated County Scenic Highways*, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed May 13, 2020.

Mitigation Measures: No mitigation measures are required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The Project site and surrounding area currently experience lighting typical of an urbanized area, such as building interior and exterior lighting, parking lot security lighting, and street lighting along Vermont Avenue. The Project would introduce similar types of lighting including interior building lighting and exterior lighting associated with building illumination, landscape lighting, parking lot lighting, and security lighting.

The Project would be required to submit a complete security and lighting plan in accordance with Gardena Municipal Code Section 18.42.150, *Security and Lighting Plan*. The purpose of the security and lighting plan is to ensure that safety and security issues are addressed in the design of developments. Lighting plans are required to demonstrate an average of 1-foot candle for all public/common areas. A Photometric Plan would be required prior to Building Permit issuance to verify compliance with Section 18.42.150. Additionally, the placement, height, and direction of illumination of light standards would be reviewed as part of the Site Plan Review to ensure the proposed lighting would not adversely affect neighboring uses (Gardena Municipal Code Chapter 18.44, Section 18.44.030, *Factors for Approval*). The City would also review new lighting for conformance with the 2019 Building Energy Efficiency Standards to ensure the minimum amount of lighting is used, and no light spillage would occur.

The Project does not propose the use of highly reflective materials or significant expanses of glass that could result in adverse impacts associated with daytime glare; refer to Exhibits 2-6 through 2-9. As discussed in Section 2.3, the proposed buildings would primarily be stucco with composite shingle roofing, vertical metal railings, vinyl windows, and decorative elements such as stucco overhangs, light fixtures and metal grilles. Thus, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.2 Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 section 1222(g)) or timberland (as defined in Public Resources Code section 4526)?				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

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?

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The City of Gardena does not contain any mapped Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.[3] Further, the Project site is zoned General Commercial (C-3) and is not zoned for agricultural use, nor is the site under a Williamson Act contract. Thus, the Project would not involve

[3] California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/agriculture/, accessed May 26, 2020.

the conversion of farmland to a non-agricultural use or conflict with existing zoning for agricultural use or a Williamson Act contact.

Mitigation Measures: No mitigation measures are required.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As stated, the Project site is zoned General Commercial (C-3). No forest land, timberland, or timberland zoned Timberland Production occurs within the City. The Project site is located within an urbanized area and is currently developed with a motel and a retail garden center and commercial container nursery. Thus, the proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use.

Mitigation Measures: No mitigation measures are required.

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?

No Impact. Refer to Responses 4.2(a) through 4.2(d), above.

Mitigation Measures: No mitigation measures are required.

4.3 Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	

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 has established thresholds of significance for air quality during project construction and operations, as shown in Table 4.3-1, *South Coast Air Quality Management District Emissions Thresholds*.

Table 4.3-1
South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors (Regional)	Construction-Related	Operational-Related
	Average Daily Emissions (pounds/day)	Average Daily Emissions (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 Carbon Monoxide (CO) impacts. The California 1-hour and 8-hour CO standards are:

- 1-hour = 20 parts per million (ppm)
- 8-hour = 9 ppm

The significance of localized impacts depends on whether ambient CO levels near a 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 Nitrogen Oxide (NOx), CO, Coarse Particulate Matter (PM_{10}), and Fine Particulate Matter ($PM_{2.5}$) generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project site without expecting to cause or substantially contribute to an exceedance of the most stringent national or state ambient air quality standards. LSTs are based on the ambient concentrations of that pollutant within the project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is applicable for all projects that disturb 5.0 acres or less on a single day. The City of Gardena is located within SCAQMD SRA 3 (Southwest Coastal LA County). Table 4.3-2, *Local Significance Thresholds (Construction/Operations)*, shows the LSTs for a 1.0-acre, 2.0-acre, and 5.0-acre project site in SRA 3 with sensitive receptors located within 25 meters of the project site.

Table 4.3-2
Local Significance Thresholds (Construction/Operations)

Project Size	Nitrogen Oxide (NOx) – lbs/day	Carbon Monoxide (CO) – lbs/day	Coarse Particulates (PM_{10}) – lbs/day	Fine Particulates ($PM_{2.5}$) – lbs/day
1.0 acres	91/91	664/664	5/1	3/1
2.0 acres	131/131	967/967	8/2	5/1
5.0 acres	197/197	1,796/1,796	15/4	8/2

Source: South Coast Air Quality Management District, *Localized Significance Threshold Methodology – Appendix C*, revised October 21, 2009.

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

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

- **Consistency Criterion No. 1**: 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 shown in Tables 4.3-3 and 4.3-4, the proposed 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 standards. Thus, no impact is expected, and the Project would be consistent with the first criterion.

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 the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

With respect to determining consistency with Consistency Criterion No. 2, it is important to recognize that air quality planning within the air basin focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not the proposed project exceeds the assumptions utilized in preparing the forecasts presented in the 2016 AQMP. Determining whether or not a project exceeds the assumptions reflected in the 2016 AQMP involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

1. *Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?*

Growth projections included in the 2016 AQMP form the basis for the projections of air pollutant emissions and are based on the General Plan land use designations and SCAG's 2016-2040 Regional Transportation Plan/Sustainability Communities Strategy (2016-2040 RTP/SCS) demographics forecasts. The population, housing, and employment forecasts within the 2016-2040 RTP/SCS are based on local general plans as well as input from local governments, such as the City of Gardena. The SCAQMD has incorporated these same demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment) into the 2016 AQMP.

As discussed in Section 4.14, Population and Housing, the Project involves the development of 84 townhome units, which would induce direct population growth in the City. Based on 2.83 persons per household, the Project's forecast population growth is approximately 238 persons.[4] The Project's forecast population growth would increase the City's existing population by less than one percent (approximately 0.40 percent) to 61,175 persons.[5] The Gardena General Plan anticipates a population of 63,799 persons at buildout. Thus, the Project would be within the population projections anticipated and planned for by the City's General Plan and would not increase growth beyond the AQMP's projections.

2. *Would the project implement all feasible air quality mitigation measures?*

The proposed Project would result in less than significant air quality impacts. Compliance with all feasible emission reduction measures identified by the SCAQMD would be required as identified in Responses (b) and (c). As such, the proposed Project meets this 2016 AQMP consistency criterion.

3. *Would the project be consistent with the land use planning strategies set forth in the AQMP?*

Land use planning strategies set forth in the 2016 AQMP are primarily based on the 2016-2040 RTP/SCS. As discussed in Section 4.8, Greenhouse Gas Emissions, the Project would be consistent with the actions and strategies of the 2016-2040 RTP/SCS. For example, the Project would be consistent with the 2016-2040 RTP/SCS goal that focuses on providing more options for short trips through Neighborhood Mobility Area and Complete Communities by incorporating walking paths within and immediately adjacent to the Project site, and by placing residential land uses within walking distance (0.25-mile) of retail and restaurants. Additionally, the Project would be located near public transit, thereby supporting the 2016-2040 RTP/SCS goal of focusing new growth around transit.

In conclusion, the determination of 2016 AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the air basin. The proposed Project would not result in a long-term impact on the region's ability to meet State and federal air quality standards. Further, the proposed Project's long-term influence on air quality in the air basin would also be consistent with the SCAQMD and

[4] Based upon the January 2020 persons per household per the State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State – January 1, 2011-2020*, Sacramento, California, May 2020.

[5] Based upon a January 2020 population of 60,937 per the State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State – January 1, 2011-2020*, Sacramento, California, May 2020.

SCAG's goals and policies and is considered consistent with the 2016 AQMP. Therefore, the Project would be consistent with the above criteria and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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?

Less Than Significant Impact.

Construction Emissions

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

Construction results in the temporary generation of emissions resulting from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water.

For purposes of this analysis, the duration of the proposed Project's construction activities was estimated to last approximately 12 months. The Project's construction-related emissions were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. Proposed Project demolition, site preparation, and grading are anticipated to begin in early 2021. Building construction was estimated to begin in early 2021 and last almost a full year until early 2022. Paving is anticipated to occur in late 2021, and architectural coatings would occur in late 2021 and early 2022. The early 2021 construction start date used in the modeling results in a conservative analysis because CalEEMod uses cleaner emissions factors in future years due to improved emissions controls and fleet turnover. The exact construction timeline is unknown, however to be conservative, earlier dates were utilized in the modeling. This approach is conservative given that emissions factors decrease in future years due to regulatory and technological improvements and fleet turnover; refer to Appendix A, Air Quality/Energy/Greenhouse Gas Emissions Data, for additional information regarding the construction assumptions used in this analysis.

The Project's predicted maximum daily construction-related emissions are summarized in Table 4.3-3, *Construction-Related Emissions (Maximum Pounds Per Day)*.

As shown in Table 4.3-3, all criteria pollutant emissions would remain below their respective thresholds. While impacts would be considered less than significant, the proposed Project would be subject to compliance with SCAQMD Rules 402, 403, and 1113, which would further reduce specific construction-related emissions. As 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, impacts associated with Project construction emissions would be less than significant.

Table 4.3-3
Construction-Related Emissions (Maximum Pounds Per Day)

Construction Year	Reactive Organic Gases (ROG)	Nitrogen Oxides (NOx)	Carbon Monoxide (CO)	Sulfur Oxides (SOx)	Coarse Particulates (PM10)	Fine Particulates (PM2.5)
2021	4.5	48.2	28.2	0.1	9.4	6.0
2022	30.5	14.63	16.2	<0.1	2.0	1.0
SCAQMD Threshold	**75**	**100**	**550**	**150**	**55**	**150**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Source: CalEEMod version 2016.3.2.						
Notes: SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment; refer to Appendix A for model outputs.						

Operational Emissions

The Project's operational emissions would be associated with motor vehicle use and area sources. Area sources include natural gas for space and water heating, gasoline-powered landscaping and maintenance equipment, and consumer products (such as household cleaners). Mobile sources emissions are generated from vehicle operations associated with Project operations. Typically, area sources are small sources that contribute very minor emissions individually, but when combined may generate substantial amounts of pollutants. Area specific defaults in CalEEMod were used to calculate area source emissions.

CalEEMod was also used to calculate pollutants emissions from vehicular trips generated from the proposed Project. The vehicle trip rate for the Project was obtained from the *Local Transportation Assessment* prepared by Kittelson & Associates; refer to Appendix I. CalEEMod default inputs for vehicle mix and trip distances were unaltered for this analysis. CalEEMod estimated emissions from Project operations are summarized in Table 4.3-4, *Operational-Related Emissions (Maximum Pounds Per Day)*. Note that emissions rates differ from summer to winter because weather factors are dependent on the season and these factors affect pollutant mixing, dispersion, ozone formation, and other factors.

As shown in Table 4.3-4, emission calculations generated from CalEEMod demonstrate that Project operations would not exceed the SCAQMD thresholds for any criteria air pollutants. Therefore, Project operational impacts would be less than significant.

Table 4.3-4
Operational-Related Emissions (Maximum Pounds Per Day)

Source	Reactive Organic Gases (ROG)	Nitrogen Oxides (NOx)	Carbon Monoxide (CO)	Sulfur Oxides (SOx)	Coarse Particulates (PM10)	Fine Particulates (PM2.5)
Summer Emissions						
Area Source	2.0	0.1	6.9	<0.1	<0.1	<0.1
Energy	<0.1	0.2	0.1	<0.1	<0.1	<0.1
Mobile	0.8	3.9	11.2	<0.1	3.4	0.9
Total	**2.9**	**4.3**	**18.3**	**<0.1**	**3.4**	**1.0**
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Winter Emissions						
Area Source	2.0	0.1	6.9	<0.1	<0.1	<0.1
Energy	<0.1	0.2	0.1	<0.1	<0.1	<0.1
Mobile	0.8	4.0	10.6	<0.1	3.4	0.9
Total	**2.9**	**4.4**	**17.7**	**<0.1**	**3.4**	**1.0**
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Source: CalEEMod Version 2016.3.2; refer to Appendix A for model outputs.						

Area Source Emissions

Area source emissions would be generated due to consumer products, architectural coating, hearths, and landscaping. As shown in Table 4.3-4, the Project's unmitigated area source emissions would not exceed SCAQMD thresholds for either the winter or summer seasons. Therefore, impacts would be less than significant and mitigation measures are not required.

Energy Source Emissions

Energy source emissions would be generated due to the Project's electricity and natural gas usage. The Project's primary uses of electricity and natural gas would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. As shown in Table 4.3-4, the Project's unmitigated energy source emissions would not exceed SCAQMD thresholds for criteria pollutants. As such, the Project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. Therefore, the Project's operational air quality impacts would be less than significant.

Mobile Source

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

Project-generated vehicle emissions have been estimated using CalEEMod, as recommended by the SCAQMD. The Project's trip generation estimates were based on the Institute of Transportation Engineers (ITE) trip generations rates provided in the Local Transportation Assessment prepared by Kittelson & Associates; refer to Appendix I. Based on the ITE trip generation rate of 5.44 trips per unit, the proposed Project would generate 457 average daily trips (ADT). The trip generation estimate is conservative given trips currently generated from on-site land uses that would be removed as part of the Project were not applied. As shown in Table 4.3-4, mobile source emissions would not exceed SCAQMD thresholds for criteria pollutants. Therefore, the Project's air quality impacts associated with mobile source emissions would be less than significant.

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 has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be utilized during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the SCAB, which would include related cumulative projects. As concluded above, the Project's construction-related impacts would be less than significant. Compliance with SCAQMD rules and regulations would further minimize the proposed Project's construction-related emissions. Therefore, Project-related construction emissions, in combination with those from other projects in the area, would not substantially deteriorate the local air quality. The Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

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 shown in Table 4.3-4, the Project's operational emissions would not exceed SCAQMD thresholds. As a result, the Project's operational emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c) 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 multiple-family residences located immediately north, mobile home residences located immediately south, and the single-family residences located immediately west 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.

The maximum daily disturbed acreage would be 4.23 acres (the gross area of the Project site). The appropriate SRA for the LSTs is the Southwest Coastal LA County area (SRA 3), since SRA 3 includes the Project site. LSTs apply to CO, NOx, 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. As stated, Project construction is anticipated to disturb a maximum of 4.23 acres in a single day.

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, LSTs for receptors located at 25 meters were utilized in this analysis for receptors closer than 25 meters. Table 4.3-5, *Localized Significance of Construction Emissions (Maximum Pounds per Day)*, presents the results of localized emissions during proposed Project construction.

As shown in Table 4.3-5, the emissions of these pollutants on the peak day of Project construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Further, the Project would be subject to compliance with SCAQMD Rules 402, 403, and 1113, which would further reduce specific construction-related emissions. Therefore, the proposed Project would result in a less than significant impact concerning LSTs during construction activities.

Table 4.3-5
Localized Significance of Construction Emissions (Maximum Pounds per Day)[1]

Construction Activity	Nitrogen Oxides (NOx)	Carbon Monoxide (CO)	Coarse Particulates (PM10)	Fine Particulates (PM2.5)
Demolition (2021)	2.8	27.0	1.5	1.3
Site Preparation (2021)	4.4	48.1	9.3	5.9
Grading (2021)	2.1	22.8	3.6	2.3
Building Construction (2021)	1.4	12.9	0.7	0.6
Building Construction (2022)	1.3	11.6	0.6	0.6
Architectural Coating (2022)	30.4	1.4	0.1	0.1
Paving (2021)	1.0	7.9	0.4	0.4
SCAQMD Localized Screening Thresholds (5 acres at 25 meters)	197	1,796	15	8
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Source: CalEEMod Version 2016.3.2; refer to Appendix A for model outputs.				
Notes: 1. Emissions reflect on-site construction emissions only, per SCAQMD guidance.				

Localized Operational Significance Analysis

The on-site operational emissions are compared to the LST thresholds in Table 4.3-6, *Localized Significance of Operational Emissions (Maximum Pounds per Day)*. Table 4.3-6 shows that the maximum daily emissions of these pollutants during Project operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, the proposed Project would result in a less than significant impact concerning LSTs during operational activities.

Table 4.3-6
Localized Significance of Operational Emissions (Maximum Pounds per Day)

Emission Sources	Nitrogen Oxides (NOx)	Carbon Monoxide (CO)	Coarse Particulates (PM10)	Fine Particulates (PM2.5)
On-Site Emissions (Area Sources)	2.0	0.1	<0.1	<0.1
SCAQMD Localized Screening Threshold (5 acres at 25 meters)	197	1,796	4	2
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Source: CalEEMod version 2016.3.2; refer to Appendix A for model outputs.				

The 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 operation of the proposed Project. Construction activities are subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial

concentrations of these emissions. Therefore, impacts associated with 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 has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the SCAB) 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.

NOx 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, ozone, NOx, and ROG have been decreasing in the SCAB since 1975 and are projected to continue to decrease in the future. Although vehicle miles traveled (VMT) in the SCAB continue to increase, NOx and ROG levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NOx 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 NOx emission reductions to attain the 1-hour ozone standard by 2022. In addition, since NOx emissions also lead to the formation of $PM_{2.5}$, the NOx 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 NOx reductions prove to be much more effective in reducing ozone levels and will also lead to a significant decrease in $PM_{2.5}$ concentrations. NOx-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 NOx 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 NOx 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 AQMP 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 AQMP also emphasized that beginning in 2012, continued implementation of previously adopted regulations will lead to NOx 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 NOx from stationary sources is expected in the 15-year period between 2008 and 2023. This is in addition to significant NOx reductions from stationary sources achieved in the decades prior to 2008.

As previously discussed, Project emissions would be less than significant and would not exceed SCAQMD thresholds; refer to Table 4.3-3 and Table 4.3-4. Localized effects of on-site Project emissions on nearby receptors were also found to be less than significant; refer to Table 4.3-5 and Table 4.3-6. 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 average daily traffic (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 457 ADT attributable to the proposed Project. Therefore, impacts would be less than significant.

Construction-Related Diesel Particulate Matter

Project construction would generate diesel particulate matter (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 closest sensitive receptors to the Project site are located to the north, south, and west. The use of diesel-powered construction equipment would be temporary and episodic and occur throughout the Project site. 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.

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. 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 proposed Project would result in a less than significant impact.

Mitigation Measures: No mitigation measures are required.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

Less Than Significant Impact.

Construction

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 volatile organic compounds 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, impacts related to odors associated with the Project's construction-related activities would be less than significant.

Operational

The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project proposes development of residential uses, which would not involve the types of uses that would emit objectionable odors affecting substantial numbers of people. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the proposed Project would not create objectionable odors and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.4 Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

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?

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?

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?

No Impact. The Project site is located within an urbanized area and is currently developed with a motel and a retail garden center and commercial container nursery, as well as surface parking. Plants and trees within the nursery are located within nursery containers/planter beds and do not contain natural habitat. The surrounding area is developed, comprised primarily of residential uses to the north, south and west. Vermont Avenue is directly adjacent to the site on the east with residential uses further east in the City of Los Angeles. Based on review of the existing and surrounding conditions, no candidate, sensitive, or special status plant or wildlife species occur on the Project site or adjacent properties. Further, there are no riparian habitat or wetlands within the Project site and surrounding area. Therefore, the proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any special status plant or wildlife species, any riparian habitat or other sensitive natural community, or on any state or federally protected wetlands.

Mitigation Measures: No mitigation measures are required.

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?

No Impact. The Project site is currently developed and in active use as a retail garden center and commercial container nursery and motel. Plants and trees within the nursery are located within nursery containers/planter beds and do not contain natural habitat. The surrounding area is developed, comprised primarily of residential uses to the north, south and west. Vermont Avenue is directly adjacent to the site on the east with residential uses further east in the City of Los Angeles. The Project site and surrounding area do not serve as a native resident or migratory wildlife corridor or wildlife nursery site. The Project would involve the removal of seven street trees along the Project frontage. The Project would be responsible for providing new street trees as required by the City as part of the plan review process. The existing trees do not provide suitable nesting habitat for migratory birds and are located directly adjacent to Vermont Avenue, a major arterial with three lanes of traffic provided in each direction. The proposed Project would not 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 and no impact would occur.

Mitigation Measures: No mitigation measures are required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. Gardena Municipal Code Chapter 13.60, *Trees, Shrubs, and Plants*, regulates the placement and provides for the proper selection of new trees to minimize problems in public facilities, and establishes requirements for the preservation and proper maintenance of existing trees located on

public property, as well as certain trees located on private property, that are deemed important to the general welfare and the benefit of the community. Gardena Municipal Code Section 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. The Project would involve the removal of seven street trees along the frontage of the Project site. The Project would be responsible for providing new street trees as required by the City as part of the plan review process. Upon approval of the Project, removal of these trees would be allowed pursuant to Gardena Municipal Code Section 13.60.110, *Tree Removal Criteria*. Additionally, the Project would provide new trees along the Project site's frontage. The proposed trees and landscaping, as well as the sidewalk would be in accordance with the City's requirements. Thus, the Project would not conflict with any local policies or ordinances protection biological resources.

Mitigation Measures: No mitigation measures are required.

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?

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. Thus, the Project would not conflict with any of these plans and no impact would occur.

Mitigation Measures: No mitigation measures are required.

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4.5 Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	

This section is based on the *Cultural and Paleontological Resources Assessment for the Evergreen Row Townhomes Project, City of Gardena, Los Angeles County, California* (Cultural Resources Assessment), prepared by Cogstone, dated July 2020 and included in its entirety as Appendix B, Cultural Resources Assessment and information obtained as part of the tribal consultation process, included as Appendix C, Tribal Consultation (AB 52 and SB 18) Communications.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact. There are two historic-aged buildings within the Project site: the Moneta Motel, constructed in 1946 and the Moneta Nursery, constructed in 1960.

A search of the California Historic Resources Information System (CHRIS) was performed at the South Central Coastal Information Center (SCCIC) that includes the Project site and a one-half mile radius. Results of the records search indicate that 10 previous studies had been completed within one-half mile of the Project area; none of which included the Project site. No previously recorded cultural resources are located within the Project site or the half-mile search radius. In addition to the SCCIC records search, additional sources were consulted, including the National Register of Historic Places (NRHP), the California Register of Historic Resources (CRHR), California Historical Resources Inventory (CHRI), California Historical Landmarks (CHL), and the California Points of Historical Interest (CPHI). Review of historic-era maps and aerial photographs were also conducted.

The Los Angeles (LA) Conservancy was also contacted and provided information regarding the Moneta sections of California Japantown. According to Erik Van Breene, LA Conservancy Preservation Coordinator, it appears that Moneta Nursery is one of the few extant historic-age building/businesses connected to Moneta's Japanese history.

For purposes of historic built environment resources, a survey of the Project site was conducted to identify and verify the location of all structures and buildings within the Project site that are 45 years in age or older.

According to the Cultural Resources Assessment, the Moneta Motel is not associated with events that have made a significant contribution to the broad patterns of our history; is not associated with the lives of persons significant in our past; does not embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; and has not, nor is likely to yield, information important in prehistory or history. Thus, the building is not recommended eligible for the California Register of Historical Resources, as it does not meet the criteria for listing, and is therefore not recommended as a "historic resource" under CEQA. Further, sometime between 2008 and 2012, a section of the south façade of the building was demolished, resulting in a notable loss of Integrity of *Design*, *Materials*, *Setting*, *Workmanship*, and *Feeling.*

The Moneta nursery is one of the last remaining extant historic-aged businesses connected to Moneta's Japanese history. However, the only historic-aged building located at the northeast corner of the property has undergone drastic additions and alterations to its original footprint resulting in the building's loss of Integrity of *Design*, *Materials*, *Setting*, *Workmanship*, and *Feeling*. In addition, similar to the Moneta Motel, the nursery building is not associated with events that have made a significant contribution to the broad patterns of our history; is not associated with the lives of persons significant in our past; does not embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; and has not, nor is likely to yield, information important in prehistory or history. Thus, the building is not recommended eligible for the California Register of Historical Resources, as it does not meet the criteria for listing, and is therefore not recommended as a "historic resource" under CEQA.

As no historic or potentially historic built environment resources are located within the site, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 and no impact would occur.

Mitigation Measures: No mitigation measures are required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less Than Significant Impact with Mitigation Incorporated. As stated above, results of the records search indicate that 10 previous studies had been completed within one-half mile of the Project area; none of which included the Project site. No previously recorded cultural resources are located within the Project site or within the half-mile search radius. A Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC) on April 17, 2020. On April 27, 2020, the NAHC responded that a search of the SLF was completed with negative results. An intensive pedestrian survey for archaeological resources was not conducted as the Project site is almost completely developed, landscaped or hardscaped.

Based on the negative findings identified above, along with a review of historic aerial photographs, the potential for subsurface archeological resource deposits is low. According to the Cultural Resources Assessment, no further archaeological work is recommended for the Project. However, there is the potential for accidental discovery of archaeological resource during ground-disturbing activities. Should Project excavation encounter archaeological resources, Mitigation Measure TCR-2 would require construction work to halt until a qualified archaeologist and Tribal Monitor/consultant can evaluate the

find; refer also to Section 4.18, Tribal Cultural Resources. With implementation of Mitigation Measure TCR-2, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 and impacts would be less than significant.

Mitigation Measures: Refer to Mitigation Measure TCR-2.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. There are no dedicated cemeteries within the Project site or surrounding area. Most Native American human remains are found in association with prehistoric archaeological sites. As discussed above, there are no known archaeological resources within the Project site or surrounding area and the potential for archaeological resources is considered low. However, there is the potential for previously unknown human remains to be discovered/disturbed during the Project's ground disturbing activities, resulting in a potentially significant impact.

If human remains are found, the remains would require proper treatment in accordance with applicable laws, including State of California Health and Safety Code Sections 7050.5-7055 and Public Resources Code Section 5097.98 and Section 5097.99. Health and Safety Code Sections 7050.5-7055 describe the general provisions for treatment of human remains. Specifically, Health and Safety Code Section 7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during excavation of a site. Health and Safety Code Section 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 Public Resources Code Section 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 (Health and Safety Code Sections 7050.5-7055 and Public Resources Code Section 5097.98 and Section 5097.99), the Project's potential impacts concerning human remains would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.6 Energy

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	

REGULATORY FRAMEWORK

California Building Energy Efficiency Standards (Title 24)

The 2019 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2020. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Under 2019 Title 24 standards, residential buildings will use about 53 percent less energy (mainly due to the requirement for new homes to provide solar photovoltaic panels and lighting upgrades) when compared to those constructed under 2016 Title 24 standards. The 2019 Title 24 standards require installation of energy efficient windows, insulation, lighting, ventilation systems, rooftop solar panels, and other features that reduce energy consumption in homes and businesses.

California Green Building Standards (CALGreen)

The 2019 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, went into effect on January 1, 2020. CALGreen is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed CALGreen in an effort to meet the State's landmark initiative Assembly Bill (AB) 32 goals, which established a comprehensive program of cost-effective reductions of greenhouse gas (GHG) emissions to 1990 levels by 2020. CALGreen was developed to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, and healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g. lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials (U.S. Green Building Council, 2020).

Senate Bill 100

Senate Bill (SB) 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024; 52 percent by December 31, 2027; 60 percent by December 31, 2030; and 100 percent by December 31, 2045. The bill requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), State board or the California Air Resources Board's (CARB), and all other State agencies to incorporate the policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and CARB to utilize programs authorized under existing statutes to achieve that policy and, as part of a public process, issue a joint report to the Legislature by January 1, 2021, and every four years thereafter, that includes specified information relating to the implementation of SB 100.

City of Gardena Climate Action Plan

The City of Gardena, in cooperation with the South Bay Cities Council of Governments (SBCCOG), developed the City of Gardena Climate Action Plan (CAP) (December 2017) to reduce GHG emissions within the City. The CAP 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 CAP includes a GHG emissions inventory as well as the following reduction targets for community-wide emissions: 15 percent of 2005 levels by 2020 and 49 percent of 2005 levels by 2035. The CAP outlines GHG reduction measures for various sectors, including Land Use and Transportation (LUT), Energy Efficiency (EE), Solid Waste (SW), Urban Greening (UG), and Energy Generation and Storage (EGS). Reduction measures include accelerating the market for electric vehicles, encouraging alternative transportation choices, increasing energy efficiency in existing buildings, reducing energy consumption, increasing solid waste diversion, and supporting energy generation in the community.

a) 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. The means to achieve the goal of conserving energy include decreasing overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. In particular, the proposed Project would be considered "wasteful, inefficient, and unnecessary" if it were to violate State and federal energy standards and/or result in significant adverse impacts related to project energy requirements, energy inefficiencies, energy intensiveness of materials, cause significant impacts on local and regional energy supplies or generate requirements for additional capacity, fail to comply with existing energy standards, otherwise result in significant adverse impacts on energy resources, or conflict or create an inconsistency with applicable plan, policy, or regulation.

The Project proposes to remove all existing on-site improvements within the 4.23-gross acre site and construct 84 three-story attached townhomes in 16 buildings (182,206 square feet; 20.24 dwelling units/net acre). The amount of energy used at the Project site would directly correlate to the size of the proposed units, the energy consumption of associated unit appliances, and outdoor lighting. Other major sources of Project energy consumption include fuel used by vehicle trips generated during Project construction and operation, and fuel used by off-road construction vehicles during construction.

The following discussion provides calculated levels of energy use expected for the proposed Project, based on commonly used modelling software (i.e. CalEEMod v.2016.3.2 and the California Air Resource Board's EMFAC2017). It should be noted that many of the assumptions provided by CalEEMod are conservative relative to the Project; thus, this discussion provides a conservative estimate of proposed Project emissions.

Electricity and Natural Gas

Electricity and natural gas used by the Project would be used primarily to power on-site buildings. Total annual natural gas (kBTU) and electricity (kWh) usage associated with the operation of the Project are shown in Table 4.6-1, *Project Operational Natural Gas and Electricity Usage*.

Table 4.6-1
Project Operational Natural Gas and Electricity Usage

Emissions	Project Annual Consumption	Los Angeles County Annual Consumption	Percent Increase
Natural Gas Consumption (therms)	9,601	2,921,000,000	0.0003%
Electricity Consumption (MWh/year)	356	68,486,000	0.0005%
Sources: CalEEMod version 2016.3.2; California Energy Commission, Electricity Consumption by County; Natural Gas Consumption by County.			

CalEEMod uses the California Commercial End Use Survey (CEUS) database to develop energy intensity value for non-residential buildings. The energy use from residential land uses is calculated based on the Residential Appliance Saturation Survey (RASS). Similar to CEUS, this is a comprehensive energy use assessment that includes the end use for various climate zones in California.

As shown in Table 4.6-1, Project operational natural gas usage is forecast to represent an approximately 0.0003 percent increase above the County's typical annual electricity consumption, and approximately 0.0005 percent increase above the county's typical natural gas consumption. These increases are minimal in the context of the County as a whole.

On-Road Vehicles (Operation)

The Project would generate vehicle trips during its operational phase. According to the *Local Transportation Assessment* prepared by Kittelson & Associates (refer to Appendix I), the Project would generate approximately 457 average daily vehicle trips. In order to calculate operational on-road vehicle energy usage and emissions, default trip lengths generated by CalEEMod (version 2016.3.2) were used, which are based on the Project location and urbanization level parameters selected within CalEEMod; refer to Appendix A. The Project would generate an estimated total of approximately 4,275 average daily vehicle miles traveled (Average Daily VMT).[6] Based on fleet mix data provided by CalEEMod and Year 2020 gasoline and diesel miles per gallon (MPG) factors for individual vehicle classes as provided by

[6] Estimated VMT is generated from CalEEMod based upon the number of Project trips and an average trip length. CalEEMod average trip lengths are used since the Project satisfies the City's SB 743 Implementation Guidance criteria for VMT screening and a detailed VMT analysis is not required; refer to Section 4.17, *Transportation*.

EMFAC2017, a weighted MPG factor for operational on-road vehicles of approximately 25.5 MPG for gasoline vehicles were derived. Based on 25.5 MPG and 4,275 Average Daily VMT, the Project would generate vehicle trips that would use approximately 168 gallons of gasoline per day or 61,320 gallons of gasoline per year.

On-Road Vehicles (Construction)

The Project would also generate on-road vehicle trips during Project construction (from construction workers and vendors). Estimates of anticipated vehicle fuel consumption were derived based on the assumed construction schedule, vehicle trip lengths, and number of workers per construction phase as provided by CalEEMod, and Year 2020 gasoline MPG factors provided by EMFAC2017. It was assumed that all vehicles would use gasoline as a fuel source (as opposed to diesel fuel or alternative sources). Table 4.6-2, *On-Road Mobile Fuel Generated by Project Construction Activities – By Phase*, describes gasoline and diesel fuel used by on-road mobile sources during each phase of the construction schedule. As shown, the vast majority of on-road mobile vehicle fuel used during the construction of the Project would occur during the building construction phase.

Table 4.6-2
On-Road Mobile Fuel Generated by Project Construction Activities – By Phase

Construction Phase	# of Days	Total Daily Worker Trips[1]	Total Daily Vendor Trips[1]	Total Hauler Trips[1]	Gallons of Gasoline Fuel[2]	Gallons of Diesel Fuel[2]
Demolition	20	20	0	28	224	91
Site Preparation	5	15	0	0	42	0
Grading	8	13	0	562	58	1,830
Building Construction	230	112	29	0	14,409	7,495
Architectural Coating	18	22	0	0	22	0
Paving	18	15	0	0	151	0
			Total	**590**	**14,906**	**9,416**

Sources: CalEEMod Version 2016.3.2; EMFAC2017.

Notes:
1. Provided by CalEEMod.
2. Refer to Appendix A for further detail.

Off-Road Vehicles (Construction)

Off-road construction vehicles would use diesel fuel during the construction phase of the Project. Off-road construction vehicles expected to be used during the construction phase of the Project include, but are not limited to, cranes, forklifts, generator sets, tractors, excavators, and dozers. Based on the total amount of CO_2 emissions expected to be generated by the proposed Project (as provided by the CalEEMod output), and a CO_2 to diesel fuel conversion factor (provided by the U.S. Energy Information Administration), the Project would use up to approximately 5,839 gallons of diesel fuel for off-road construction vehicles during the site preparation and grading phases of the Project; refer to Appendix A for detailed calculations.

Other

Project landscape maintenance activities would generally require the use of fossil fuel (e.g., gasoline) energy. For example, lawn mowers require the use of fuel for power. It is estimated that landscape care maintenance would require approximately two individuals, four hours per week, or 416 person-hours per year. Assuming an average of approximately 0.5 gallons of gasoline used per person-hour, the Project would use approximately 208 gallons of gasoline per year to power landscape maintenance equipment. The energy used to power landscape maintenance equipment would not differ substantially from the energy required for landscape maintenance for a similar Project.

Conclusion

The proposed Project would use energy resources for the operation of the residential buildings (e.g., electricity and natural gas), for on-road vehicle trips (e.g. gasoline and diesel fuel) generated by the Project (both during Project construction and operation), and from off-road construction activities associated with the Project (e.g. diesel fuel). Each of these activities would require the use of energy resources. The Project would be responsible for conserving energy, to the extent feasible, and would be required to comply with Statewide and local measures regarding energy conservation, such as Title 24 building efficiency standards.

The proposed Project would be in compliance with all applicable federal, State, and local regulations regulating energy usage. For example, Southern California Edison (SCE) is responsible for the mix of energy resources used to provide electricity for its customers, and it is in the process of implementing the Statewide Renewable Portfolio Standard (RPS) to increase the proportion of renewable energy (e.g. solar and wind) within its energy portfolio. SCE has achieved at least a 33 percent mix of renewable energy resources, and will be required to achieve a renewable mix of at least 50 percent by 2030. Additionally, energy-saving regulations, including the latest State Title 24 building energy efficiency standards ("part 6"), would be applicable to the proposed Project. Other statewide measures, including those intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g. the Pavley Bill and the Low Carbon Fuel Standard) are improving vehicle fuel economies, thereby conserving gasoline and diesel fuel. These energy savings would continue to accrue over time.

As a result, the Project would not result in any significant adverse impacts related to Project energy requirements, energy use inefficiencies, and/or the energy intensiveness of materials by amount and fuel type for each stage of the Project including construction, operations, maintenance, and/or removal. Both SCE, the electricity provider to the site, and Southern California Gas, the natural gas provider to the site, maintain sufficient capacity to serve the proposed Project. The Project would be required to comply with all existing energy efficiency standards, and would not result in significant adverse impacts on energy resources. Therefore, the proposed Project would not result in a wasteful, inefficient, or unnecessary of energy resources during Project construction or operation. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Table 4.6-3, *Gardena Climate Action Plan Project Consistency Analysis*, provides an analysis of the Project's consistency with applicable policies in the *City of Gardena Climate Action Plan* (CAP), 2017. The Project would be required to comply with the most recent version of

CALGreen, which requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g. lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. As indicated in Table 4.6-3, the Project would be consistent with the measures identified in the City's CAP and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; impacts would be less than significant.

Table 4.6-3
Gardena Climate Action Plan Project Consistency Analysis

Gardena Climate Action Plan Measure	Consistency Analysis
Measure LUT: G1 – Increase Density	Consistent. The Project proposes to rezone the site to allow for a higher density infill residential development. Further, the Project site is located within a high-quality transit area and within an area identified as experiencing VMT below the SCAG Regional Average.
Measure EE: B1 – Encourage or Require Energy Efficiency Standards Exceeding Title 24	Consistent. The Project would be required to comply with the 2019 version of the Title 24 CALGreen standards, which provide higher energy efficiency requirements as compared to the earlier version of Title 24 standards.
Measure EE: E1 – Promote or Require Water Efficiency Through SB X7-7	Consistent. The Project would be required to comply with the 2019 version of the Title 24 CALGreen standards, which include water efficiency standards the exceed the water efficiency requirements contained in previous versions of the Title 24 standards.
Source: City of Gardena Climate Action Plan, December 2017.	

Mitigation Measures: No mitigation measures are required.

4.7 Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1) 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
2) Strong seismic ground shaking?			X	
3) Seismic-related ground failure, including liquefaction?			X	
4) 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 waste water disposal systems where sewers are not available for the disposal of waste water?				X
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

This section is based on the *Preliminary Geotechnical Investigation, Proposed Residential Development, 13633 Vermont Avenue, Gardena California* (Geotechnical Investigation), prepared by Albus-Keefe & Associates, Inc., dated November 15, 2019 and included in its entirety as Appendix D, Preliminary Geotechnical Investigation and the *Cultural and Paleontological Resources Assessment for the Evergreen Row Townhomes Project, City of Gardena, Los Angeles County, California* (Cultural Resources Assessment), prepared by Cogstone, dated July 2020 and included in its entirety as Appendix B, Cultural Resources Assessment.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

1) 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 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). According to the Geotechnical Investigation, geologic literature and field exploration do not indicate the presence of active faulting within the Project site. Additionally, the site does not lie within an Earth Fault Zone as defined by the State of California in the Earthquake Fault Zoning Act; no impact would occur.

Mitigation Measures: No mitigation measures are required.

2) Strong seismic ground shaking?

Less Than Significant Impact. According to the Geologic Investigation, the Project site is located in a seismically active area that has historically been affected by moderate to occasionally high levels of ground motion. Specifically, there are three known seismically active faults within five miles of the Project site. As a result, during the life of the proposed development, it is likely the Project would experience moderate to occasionally high ground shaking from these fault zones, as well as some background shaking from other seismically active areas of the southern California region. Therefore, the Project could expose people or structures to potential adverse effects as a result of strong seismic ground shaking. The intensity of ground shaking on the Project site would depend upon the earthquake's magnitude, distance to the epicenter, and geology of the area between the Project site and epicenter.

The Geologic Investigation concluded that development of the Project, as proposed, is feasible from a geotechnical point of view provided the recommendations presented in the Geologic Investigation are incorporated into the design and construction of the Project. The Geotechnical Investigation includes specific recommendations based on seismic design parameters for foundation design, retaining and screening walls, exterior flatwork, concrete mix design, corrosion, pavement design, and general earthwork and grading, among other factors. Further, design of the proposed structures in accordance

with the current California Building Code is anticipated to adequately mitigate concerns with ground shaking.

Pursuant to Gardena Municipal Code Chapter 15.04, *General Building Provisions*, the City has adopted the 2019 California Building Standards Code (CBSC), subject to certain amendments and changes, including amendments specific to seismic conditions. The Project would be required to comply with all applicable regulations in the most recent CBSC as amended by the Gardena Municipal Code, which includes design requirements to mitigate the effects of potential hazards associated with seismic ground shaking. The Gardena Building Services Division would review construction plans for compliance with the CBSC and Gardena Municipal Code, as well as the Geotechnical Investigation's recommendations. Thus, compliance with the City's established regulatory framework and standard engineering practices and design criteria, which would be verified through the City's construction plan review process, would ensure potential impacts associated with strong seismic ground shaking at the Project site would be reduced to a less than significant level.

Mitigation Measures: No mitigation measures are required.

3) 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. Engineering research of soil liquefaction potential indicates that generally three basic factors must exist concurrently in order for liquefaction to occur. These factors include:

- A source of ground shaking, such as an earthquake, capable of generating soil mass distortions.
- A relatively loose silty and/or sandy soil.
- A relative shallow groundwater table (within approximately 50 feet below ground surface) or completely saturated soil conditions that will allow positive pore pressure generation.

As part of the Geotechnical Investigation, liquefaction susceptibility of the onsite soils was evaluated by analyzing the potential of concurrent occurrence of the above-mentioned three basic factors. The Project site is not mapped within a zone of potentially liquefiable soils; groundwater was not encountered during the subsurface exploration conducted at the Project site and was determined to be as deep as 60 feet; and the Project site is underlain by Pleistocene aged deposits, typically not susceptible to liquefaction. Thus, the potential for liquefaction at the site is considered to be low due to the depth of groundwater and soil conditions and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4) 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 Geologic Investigation, geologic hazards associated with landsliding are not anticipated as the Project site is not located within an area identified by the California Geologic Survey as having potential for seismic slope instability. Further, the Project site and surrounding area are relatively flat and do not contain any landforms capable of experiencing landslides.

Mitigation Measures: No mitigation measures are required.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project site and surrounding area are relatively flat. Soils materials consist of approximately 3.5 feet of artificial fill over older alluvial soils. The artificial fill materials were observed to be slightly moist and very stiff. The older alluvial soils are comprised of silt with variable amounts of sand and clay. Grading and earthwork activities associated with Project construction would expose soils to potential short-term erosion by wind and water. Gardena Municipal Code Chapter 8.70, *Stormwater and Runoff Pollution Control*, requires the reduction of pollutants being discharged to the waters of the U.S. through the elimination of non-stormwater discharges to the municipal stormwater system; elimination of the discharge of pollutants into the municipal storm drain system; reduction of pollutants in stormwater discharges to the maximum extent practicable; and protection and enhancement of the quality of the waters of the U.S. consistent with the provisions of the Clean Water Act. Gardena Municipal Code Section 8.70.110, *Pollutant Source Reduction*, requires construction projects that disturb one or more acres of soil by grading, clearing, and/or excavating or other activities to obtain a general construction activity stormwater permit (GCAWSP) from the State Water Resources Control Board prior to issuance of a grading permit. Construction activities would be required to comply with the erosion and siltation control measures of the GCAWSP, reducing potential impacts associated with soil erosion or the loss of topsoil during construction activities to a less than significant level.

Development of the Project would increase the amount of impervious area when compared to existing conditions; refer to Section 4.10, Hydrology and Water Quality. The Project proposes a retention-based stormwater quality control measure in the form of a drywell with a pretreatment chamber. Stormwater would enter the drywell unit via curb openings throughout the site and flow via pipe directly onto a specially designed pretreatment chamber. The pretreatment chamber would be designed to intercept the majority of the first flows during a rain event and reduce the impact of sediment and debris on the system. After the pretreatment chamber fills up, stormwater would flow onto the main drywell system where it would be infiltrated. Additionally, the Project would be required to implement BMPs in accordance with the Project's Low Impact Development Plan (refer to Section 4.10), including common area landscape management, which would ensure landscaped areas would be maintained and properly irrigated to reduce the amount of potential soil erosion or the loss of top soil. Following compliance with the established regulatory framework identified in the Gardena Municipal Code regarding stormwater and runoff pollution control and implementation of the Project's Low Impact Development Plan, potential impacts associated with soil erosion and the loss of topsoil would be less than significant.

Mitigation Measures: No mitigation measures are required.

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?

Less Than Significant Impact. Refer to Responses 4.7(a)(3) and 4.7(a)(4) regarding the potential for liquefaction and landslides, respectively.

Static Settlement. According to the Geotechnical Investigation, existing artificial fills on the Project site consist of variable materials which are considered unsuitable for support of the proposed development in its current condition. Removal and recompaction of the existing surficial soils would be necessary to provide a uniform compacted blanket. Grading and construction in accordance with the Geotechnical Investigation recommendations would result in estimated total and differential settlement of proposed

improvements to be less than one inch and 0.5-inch over 30 feet, respectively, which are considered within tolerable limits of proposed site development.

Shrinking and Subsidence. Existing artificial fill soils are anticipated to shrink less than five percent to negligible. Subsidence due to reprocessing of removal bottoms is also anticipated to be negligible. However, in accordance with the Geotechnical Investigation, contingencies are necessary for balancing earthwork quantities based on actual shrinkage and subsidence that occurs during the grading process.

As stated, the Geotechnical Investigation concluded that development of the Project, as proposed, is feasible from a geotechnical point of view provided the recommendations presented in the Geologic Investigation are incorporated into the design and construction of the Project. The Geotechnical Investigation includes specific recommendations based on seismic design parameters for foundation design, retaining and screening walls, exterior flatwork, concrete mix design, corrosion, pavement design, and general earthwork and grading, among other factors.

The Project would be required to comply with all applicable regulations in the most recent CBSC as amended by the Gardena Municipal Code. The Gardena Building Services Division would review construction plans for compliance with the CBSC and Gardena Municipal Code, as well as the Geotechnical Investigation's recommendations. Thus, compliance with the City's established regulatory framework and standard engineering practices and design criteria, which would be verified through the City's construction plan review process, would ensure potential impacts associated with a geologic unit or soil that is unstable or would become unstable at the Project site would be reduced to a less than significant impact.

Mitigation Measures: No mitigation measures are required.

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?

Less Than Significant Impact. The Geotechnical Investigation indicates that the near-surface soils within the Project site are generally anticipated to possess a very low to low expansion potential. Additional testing for soil expansion would be required subsequent to rough grading and prior to construction of foundations and other concrete flatwork to confirm these conditions. As stated, the Geotechnical Investigation concluded that development of the Project, as proposed, is feasible from a geotechnical point of view provided the recommendations presented in the Geologic Investigation are incorporated into the design and construction of the Project. The Geotechnical Investigation includes specific recommendations based on seismic design parameters for foundation design, retaining and screening walls, exterior flatwork, concrete mix design, corrosion, pavement design, and general earthwork and grading, among other factors.

The Project would be required to comply with all applicable regulations in the most recent CBSC as amended by the Gardena Municipal Code. The Gardena Building Services Division would review construction plans for compliance with the CBSC and Gardena Municipal Code, as well as the Geotechnical Investigation's recommendations. Thus, compliance with the City's established regulatory framework and standard engineering practices and design criteria, which would be verified through the City's construction plan review process, would ensure potential impacts associated with expansive soils at the Project site would be reduced to a less than significant impact.

Mitigation Measures: No mitigation measures are required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project would be served by the existing sewer system and would not involve the use of septic tanks or alternative wastewater disposal systems.

Mitigation Measures: No mitigation measures are required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation Incorporated. Significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or diagnostically important. Significant fossils can include remains of large to very small aquatic and terrestrial vertebrates or remains of plants and animals previously not represented in certain portions of the stratigraphy. Assemblages of fossils that might aid stratigraphic correlation, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, and paleoclimatology are also critically important.

The Project site is mapped entirely as middle to late Pleistocene older alluvium which was deposited between 500,000 and 11,700 years ago. These fluvial and flood plain deposits consist of layered poorly sorted, moderately well-indurated, slightly dissected, gravels to clays. The sediments were deposited by streams and rivers on canyon floors and in the flat flood plains of the area.

As part of the Cultural Resources Assessment, a records search of the Project area was obtained from the Natural History Museum of Los Angeles County. Additional records from the from the University of California Museum of Paleontology database, the PaleoBiology Database, and print sources were also searched for fossil records. No recorded paleontological localities producing vertebrate fossils were found within 1.0-mile of the Project area. Six localities are known from Pleistocene deposits between 1.5 and 3.0 miles and another 15 localities were found between 3.0 and 10.0 miles from the Project site. Extinct megafauna from these sites include ground sloth (†*Paramylodon* sp.), mastodon (†*Mammut* sp.) mammoth (†*Mammuthus* sp.), dire wolf (†*Canis dirus*), horse (†*Equus* sp.), two types of pronghorn antelope (†*Capromeryx* sp., †*Breameryx* sp.), camel (†Camelidae), and bison (†*Bison* sp.; Table 2). All of the fossils were a minimum of five feet deep in deposits mapped as late Pleistocene at the surface, while sediments with a Holocene component produced fossils starting at 11 feet deep. As the Project area is almost completely landscaped or hardscaped, an intensive pedestrian survey for paleontological resources was not conducted.

A multilevel ranking system was developed by professional resource managers within the Bureau of Land Management (BLM) as a practical tool to assess the sensitivity of sediments for fossils. The Potential Fossil Yield Classification (PFYC) system has a multi-level scale based on demonstrated yield of fossils. The PFYC system provides additional guidance regarding assessment and management for different fossil yield rankings. Fossil resources occur in geologic units (e.g., formations or members). The probability for finding significant fossils in a project area can be broadly predicted from previous records of fossils recovered from the geologic units present in and/or adjacent to the study area. The geological setting and the number of known fossil localities help determine the paleontological sensitivity according to PFYC criteria.

Using the PFYC system, geologic units are classified according to the relative abundance of vertebrate fossils or scientifically significant invertebrate or plant fossils and their sensitivity to adverse impacts within the known extent of the geological unit. Although significant localities may occasionally occur in a geologic unit, a few widely scattered important fossils or localities do not necessarily indicate a higher PFYC value; instead, the relative abundance of localities is intended to be the major determinant for the value assignment.

The Project site is mapped entirely as middle to late Pleistocene older alluvium. A records search revealed that all of the fossils previously recovered within a 10-mile radius were a minimum of five feet deep in deposits mapped as late Pleistocene at the surface. Sediments with a Holocene component such as those of the study area produced fossils starting at five feet deep. As such, the Project sediments less than five feet below the modern surface are assigned a low potential for fossils (PFYC 2) due to the lack of fossils in these deposits. Sediments more than five feet below the modern surface are assigned a moderate potential for fossils (PFYC 3) due to similar deposits producing fossils at that depth near to the study area.

The Project proposes excavation depths of approximately 11 feet for utilities, four to six feet for the proposed catch basin, eight to 10 feet for the proposed detention system and 50 feet for the drywell system, which would be augered. Augering, potholing, pile driving, and similar activities regardless of depth, have a low potential to produce fossils meeting significance criteria because any fossils brought up by the auger during drilling would not have information about formation, depth or context. The only instance in which such fossils would meet significance criteria is if the fossil is a species new to the region.

Based on fossils found in similar sediments nearby, there is the potential for Project excavation activities greater than five feet deep into native sediments to encounter paleontological resources. Thus, Mitigation Measure GEO-1 would require a paleontological monitor to be at the site during ground disturbances occurring greater than 5.0 feet below the historic surface elevation in native sediments. Additionally, Condition of Approval (COA) GEO-1 would require Worker Awareness and Environmental Program (WEAP) Training for construction personnel involved in ground disturbing activities. COA GEO-2 details the appropriate steps in the event paleontological resources are encountered during ground disturbing activities, including the requirement for all work within a 100-foot radius of the find to be halted and a professional vertebrate paleontologist be contacted to evaluate the find. The significance of the find would be evaluated and if determined to be significant, the paleontologist would determine any additional work, such as data recovery excavation, that would be warranted, prior to construction activities resuming. With implementation of Mitigation Measure GEO-1 and COA GEO-1 and GEO-2, potential impacts to paleontological resources would be reduced to a less than significant level.

COA GEO-1: Prior to commencement of ground-disturbing activities a qualified vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall develop Worker Awareness and Environmental Program (WEAP) Training for construction personnel. This training shall be presented to construction personnel and include what fossil remains may be found within the Project area and policies and procedures that must be followed in case of a discovery. Verification of the WEAP Training shall be provided to the Gardena Community Development Department.

COA GEO-2: If fossils or fossil bearing deposits are encountered during ground-disturbing activities, work within a 25-foot radius of the find shall halt and a professional vertebrate

paleontologist (as defined by the Society for Vertebrate Paleontology) shall be contacted immediately to evaluate the find. The paleontologist shall have the authority to stop or divert construction, as necessary. Documentation and treatment of the discovery shall occur in accordance with Society of Vertebrate Paleontology standards. The significance of the find shall be evaluated pursuant to the State CEQA Guidelines. If the discovery proves to be significant, before construction activities resume at the location of the find, additional work such as data recovery excavation may be warranted, as deemed necessary by the paleontologist.

Mitigation Measures:

GEO-1: Paleontological resources monitoring by a qualified vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall be required during ground disturbances greater than 5.0 feet below the historic surface elevation in native sediments. Auguring, potholing, and pile driving activities do not need to be monitored as these activities are unlikely to produce significant fossil because information about formation, depth, or context is impossible to discern. Should similar activities be planned, the qualified paleontologist shall be consulted prior to commencement so they may determine if that activity requires monitoring.

4.8 Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere from space, and a portion of the radiation is absorbed by the Earth's surface. The Earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation.

Naturally occurring GHGs include water vapor (H_2O), carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and ozone (O_3). Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also GHGs, but they are, for the most part, solely a product of industrial activities. Although the direct GHGs, including CO_2, CH_4, and N_2O, occur naturally in the atmosphere, human activities have changed their atmospheric concentrations. From the pre-industrial era (i.e., ending about 1750) to 2011, concentrations of these three GHGs have increased globally by 40, 150, and 20 percent, respectively (IPCC, 2013).

Greenhouse gases, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), ozone (O_3), water vapor, nitrous oxide (N_2O), and chlorofluorocarbons (CFCs).

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. In California, the transportation sector is the largest emitter of GHGs, followed by the industrial sector (California Energy Commission, 2020).

As the name implies, global 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, respectively. California produced 424 million gross metric tons of carbon dioxide equivalents ($MMTCO_2e$) in 2019 (California Energy Commission, 2019). Given that the U.S. EPA estimates that worldwide emissions from human activities totaled nearly 46 billion gross metric tons of carbon dioxide equivalents ($BMTCO_2e$) in 2010, California's incremental contribution to global GHGs is approximately 2 percent (U.S. EPA, 2014).

Carbon dioxide equivalents are a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted.

Consumption of fossil fuels in the transportation sector was the single largest source of California's GHG emissions in 2014, accounting for 41 percent of total GHG emissions in the state. This category was followed by the industrial sector (24%), the electricity generation sector (including both in-state and out of-state sources) (15%) and the agriculture sector (8%) (California Energy Commission, 2016).

REGULATORY FRAMEWORK

U.S. Environmental Protection Agency Endangerment Finding

The U.S. Environmental Protection Agency's (EPA) authority to regulate GHG emissions stems from the U.S. Supreme Court decision in Massachusetts v. EPA (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Clean Air Act and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (CO2, CH4, N2O, hydrofluorocarbons [HFCs], perfluorocarbons [PFCs], and sulfur hexafluoride [SF6]) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing Clean Air Act and the EPA's assessment of the scientific evidence that form the basis for the EPA's regulatory actions.

Assembly Bill 32 (California Global Warming Solutions Act of 2006)

California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500-38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to Assembly Bill (AB) 1493 (Pavley Bill) should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then the California Air Resources Board (CARB) should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

Senate Bill 375

Senate Bill (SB) 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable communities' strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPOs regional transportation plan. CARB, in consultation with MPOs, is required to provide each affected region with GHG reduction targets emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets are to be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is

also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects may not be eligible for funding.

Executive Order S-3-05

Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The Executive Order directed the California Environmental Protection Agency (Cal/EPA) Secretary to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The Secretary is required to submit biannual reports to the Governor and California Legislature describing the progress made toward the emissions targets, the impacts of global climate change on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with Executive Order S-3-05, the Cal/EPA Secretary created the California Climate Action Team, made up of members from various State agencies and commissions. The Climate Action Team released its first report in March 2006, which proposed to achieve the targets by building on the voluntary actions of California businesses, local governments, and communities and through State incentive and regulatory programs.

Title 24, Part 6

The California Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6 of the California Code of Regulations (CCR) and commonly referred to as "Title 24" were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Part 6 of Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Title 24 standards took effect on January 1, 2020. Under 2019 Title 24 standards, residential buildings will use about 53 percent less energy, mainly due to solar photovoltaic panels and lighting upgrades, when compared to those constructed under 2016 Title 24 standards.

Title 24, Part 11

The California Green Building Standards Code (CCR Title 24, Part 11), commonly referred to as CALGreen, is a Statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in five green building topical areas. The most recent update to the CALGreen Code went into effect on January 1, 2020.

Senate Bill 3

Signed into law on September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). SB 32 authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

CARB Scoping Plan

On December 11, 2008, CARB adopted its Climate Change Scoping Plan (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. The Scoping Plan contains the main strategies California will implement to reduce CO2eq emissions by 174 million metric tons (MT), or approximately 30 percent, from the State's projected 2020 emissions levels of 596 million MTCO2eq under a business as usual (BAU) scenario. This is a reduction of 42 million MTCO2eq, or almost ten percent, from 2002 to 2004 average emissions, and requires the reductions in the face of population and economic growth through 2020.

The Scoping Plan calculates 2020 BAU emissions as the emissions that would be expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, industrial, commercial, and residential). CARB used three-year average emissions, by sector, from 2002 to 2004 to forecast emissions to 2020. The measures described in the Scoping Plan are intended to reduce projected 2020 BAU emissions to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The 2014 Scoping Plan summarizes recent science related to climate change, including anticipated impacts to California and the levels of GHG reduction necessary to likely avoid risking irreparable damage. It identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. The 2014 Scoping Plan also looks beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observes that "a mid-term statewide emission limit will ensure that the State stays on course to meet our long-term goal." The 2014 Scoping Plan did not establish or propose any specific post-2020 goals, but identified such goals adopted by other governments or recommended by various scientific and policy organizations.

In December 2017, CARB approved the California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Scoping Plan). This update focused on implementation of a 40-percent reduction in GHGs by 2030 compared to 1990 levels. To achieve this, the 2017 Scoping Plan draws on a decade of successful programs that addresses the major sources of climate changing gases in every sector of the economy:

- More Clean Cars and Trucks: The 2017 Scoping Plan establishes far-reaching programs to incentivize the sale of zero-emission vehicles, drive the deployment of zero-emission trucks, and shift to a cleaner system of handling freight Statewide.
- Increased Renewable Energy: California's electric utilities are ahead of schedule in meeting the requirement that 33 percent of electricity come from renewable sources by 2020. The 2017 Scoping Plan guides utility providers to 50 percent renewables, as required under SB 350.
- Slashing Super-Pollutants: The 2017 Scoping Plan calls for a significant cut in super-pollutants, such as CH_4 and HFC refrigerants, which are responsible for as much as 40 percent of global warming.
- Cleaner Industry and Electricity: California's renewed cap-and-trade program extends the declining cap on emissions from utilities and industries and the carbon allowance auctions. The

auctions will continue to fund investments in clean energy and efficiency, particularly in disadvantaged communities.
- Cleaner Fuels: The Low Carbon Fuel Standard will drive further development of cleaner, renewable transportation fuels to replace fossil fuels.
- Smart Community Planning: Local communities will continue developing plans which will further link transportation and housing policies to create sustainable communities.
- Improved Agriculture and Forests: The 2017 Scoping Plan also outlines innovative programs to account for and reduce emissions from agriculture, as well as forests and other natural lands.

Gardena Climate Action Plan

The City of Gardena, along with the South Bay Cities Council of Governments (SBCCOG), developed a Climate Action Plan (CAP) to reduce GHG emissions within the City. The City of Gardena CAP (December 2017) 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 CAP includes a GHG emissions inventory as well as the following reduction targets for community-wide emissions: 15 percent of 2005 levels by 2020 and 49 percent of 2005 levels by 2035. The CAP outlines GHG reduction measures for various sectors, including transportation, land use, energy efficiency, solid waste, urban greening, and energy generation and storage. Reduction measures include accelerating the market for electric vehicles, encouraging alternative transportation choices, increasing energy efficiency in existing buildings, reducing energy consumption, increasing solid waste diversion, and supporting energy generation in the community.

The implementation of CAP emissions reduction measures would achieve the reduction target for 2020 and 2035. In the coming years, as the CAP is reviewed and revised, measures will be implemented to achieve the 2035 target. The CAP includes monitoring and a target for tracking progress with re-inventorying at later dates.

A critical aspect of having a CAP that fits the criteria within CEQA Guidelines Section 15183.5 is to have reduction targets that align with Statewide goals. The CAP's 2020 and 2035 reduction targets (i.e., below baseline emission levels) parallel the State's commitment to reducing GHG emissions under AB 32. However, it proceeds even further by identifying targets that are specific to the City's geographic location as well as activity types and their associated sources. Therefore, because the CAP's 2020 and 2035 targets align with the Statewide goal for 2020 (i.e., achieving 1990 levels), the CAP is consistent with AB 32. Through 2035, the CAP is a qualifying plan under CEQA Guidelines Section 15183.5.

Thresholds of Significance

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions and gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. This section recommends certain factors to be considered in the determination of significance (i.e., the extent to which a project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHGs). The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (CEQA Guidelines Section 15064.7(c)).

The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analyses (CEQA Guidelines Section 15064(h)(3)).[7,8] A project's incremental contribution to a cumulative impact can be found not to be cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The proposed Project would generate GHGs during the construction and operational phases of the Project. The Project's primary source of construction-related GHGs would result from emissions of CO_2 associated with Project construction and worker vehicle trips; refer to Table 4.8-1, *Construction GHG Emissions (Unmitigated Metric Tons/Year)*. Additionally, the Project would require limited grading, and would also include site preparation, building construction, and architectural coating phases.

Table 4.8-1
Construction GHG Emissions (Unmitigated Metric Tons/Year)

Year	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_2O	CO_2e
2021	0	459.8	459.8	0.1	0	461.4
2022	0	47.1	47.1	<0.1	0	47.2
Maximum	**0**	**459.8**	**459.8**	**0.1**	**0**	**461.4**
Source: CalEEMod version 2016.3.2						

As shown in Table 4.8-1, Project construction-related activities would generate a maximum of approximately 461 $MTCO_2e$ of GHG emissions in a single year, or approximately 509 $MTCO_2e$ 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.[9] The amortized

[7] California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action*, pp. 11-13, 14, 16, December 2009, https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf.
[8] State of California Governor's Office of Planning and Research, *Transmittal of the Governor's Office of Planning and Research's Proposed SB97 CEQA Guidelines Amendments to the Natural Resources Agency*, April 13, 2009, https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/C01.pdf
[9] 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).

Project emissions would be approximately 17 $MTCO_2e$ per year. Once construction is complete, the generation of construction-related GHG emissions would cease.

The operational phase of the Project would generate GHGs primarily from the Project's operational vehicle trips and building energy (electricity and natural gas) usage; refer to Table 4.8-2, *Operational GHG Emissions 2021 (Unmitigated Metric Tons/Year)*. Other sources of GHG emissions would be minimal.

Table 4.8-2
Operational GHG Emissions 2021 (Unmitigated Metric Tons/Year)

Category	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_2O	CO_2e
Area	0	1.4	1.4	<0.1	0	1.4
Energy	0	164.6	164.6	<0.1	<0.1	165.3
Mobile	0	661.8	661.8	<0.1	0	662.7
Waste	7.9	0	7.9	0.5	0	19.5
Water	1.7	40.9	42.6	0.2	<0.1	48.5
Total	**9.6**	**868.7**	**878.3**	**0.7**	**<0.1**	**897.4**
Source: CalEEMod version 2016.3.2						

As shown in Table 4.8-2, Project operational GHG emissions would total approximately 897 $MTCO_2e$ annually, and combined with construction-related GHG emissions, would total approximately 914 $MTCO_2e$ annually. Therefore, the proposed Project would not exceed the SCAQMD's proposed GHG threshold of 3,000 MTCO2e per year.[10] In addition, with continued implementation of various statewide measures, the Project's operational energy and mobile source emissions would continue to decline in the future.

Consistency with Applicable GHG Plans, Policies, or Regulations

Gardena Climate Action Plan Consistency

As stated, the CAP's 2020 and 2035 reduction targets (i.e., below baseline emission levels) parallel the State's commitment to reducing GHG emissions under AB 32. Through 2035, the CAP is a qualifying plan under CEQA Guidelines Section 15183.5. In the coming years, as the CAP is reviewed and revised, measures will be implemented to achieve the 2035 target. The CAP includes monitoring and a target for

[10] 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 CO_2e 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, a variety of city and county planning departments. The numeric bright line and efficiency-based thresholds were developed to be consistent 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.

tracking progress with re-inventorying at later dates. As demonstrated in Table 4.6-3, the Project would be consistent with the City's CAP.

2017 Scoping Plan Consistency

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the California Legislature as AB 32. In 2008, CARB approved a Scoping Plan as required by AB 32. The Scoping Plan has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The 2017 Scoping Plan identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the Scoping Plan (2013 Scoping Plan). Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted subsequently as required to achieve Statewide GHG emissions targets.

Table 4.8-3, *Project Consistency with the 2017 Scoping Plan*, summarizes the Project's consistency with applicable policies and measures of the 2017 Scoping Plan. As indicated in Table 4.8-3, the Project would not conflict with any of the provisions of the 2017 Scoping Plan and would support four of the action categories through energy efficiency, water conservation, recycling, and landscaping.

Table 4.8-3
Project Consistency with the 2017 Scoping Plan

Sector/Source	Category/Description	Consistency Analysis
Area		
SCAQMD Rule 445 (Wood Burning Devices)	Restricts the installation of wood-burning devices in new development.	Mandatory Compliance. Approximately 15 percent of California's major anthropogenic sources of black carbon include fireplaces and woodstoves.[1] The Project would not include hearths (woodstove and fireplaces) as mandated by this rule.
Energy		
California Renewables Portfolio Standard, Senate Bill 350 (SB 350) and Senate Bill 100 (SB 100)	Increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020. SB 350 requires 50 percent by 2030. SB 100 requires 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.	No Conflict. The Project would utilize electricity provided by Southern California Edison (SCE), which is required to meet the 2020, 2030, 2045, and 2050 performance standards. In 2018, 31 percent of SCE's electricity came from renewable resources.[2] By 2030 SCE plans to achieve 80 percent carbon-free energy.[3]
California Code of Regulations, Title 24, Building Standards Code	Requires compliance with energy efficiency standards for residential and nonresidential buildings.	Mandatory Compliance. The Project is required to meet the applicable requirements of the 2019 Title 24 Building Energy Efficiency Standards, including installation of rooftop solar panels and additional CALGreen requirements (see discussion under CALGreen Code requirements below).

Table 4.8-3 (continued)
Project Consistency with the 2017 Scoping Plan

Sector/Source	Category/Description	Consistency Analysis
California Green Building Standards (CALGreen) Code Requirements	All bathroom exhaust fans are required to be ENERGY STAR compliant.	Mandatory Compliance. The Project construction plans are required to demonstrate that energy efficiency appliances, including bathroom exhaust fans, and equipment are ENERGY STAR compliant.
	HVAC system designs are required to meet American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) standards.	Mandatory Compliance. The Project construction plans are required to demonstrate that the HVAC system meets the ASHRAE standards.
	Air filtration systems are required to meet a minimum efficiency reporting value (MERV) 8 or higher.	Mandatory Compliance. The Project is required to install air filtration systems (MERV 8 or higher) as part of its compliance with 2019 Title 24 Section 401.2, Filters.
	Refrigerants used in newly installed HVAC systems shall not contain any chlorofluorocarbons.	Mandatory Compliance. The Project must meet this requirement as part of its compliance with the CALGreen Code.
	Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces is required for such vehicles.	Mandatory Compliance. The Project would meet this requirement as part of its compliance the CALGreen Code. Per the 2019 CALGreen Code Residential Mandatory Measure 4.106.4.1, new townhomes with attached private garages are required to install a raceway to accommodate a future electric vehicle (EV) charging space. Additionally, in compliance with 2019 CALGreen Code Residential Mandatory Measure 4.106.4.2, a project is required to provide ten percent of the total number of residential parking spaces as EV spaces.

Table 4.8-3 (continued)
Project Consistency with the 2017 Scoping Plan

Sector/Source	Category/Description	Consistency Analysis
Mobile Sources		
Mobile Source Strategy (Cleaner Technology and Fuels)	Reduce GHGs and other pollutants from the transportation sector through transition to zero-emission and low-emission vehicles, cleaner transit systems, and reduction of vehicle miles traveled.	Consistent. The Project would be consistent with this strategy by supporting the use of zero-emission and low-emission vehicles; refer to CALGreen Code discussion above. Additionally, as discussed in Section 4.17, Transportation, the Project proposes higher density residential uses within an area of the City with a daily residential home-based vehicle miles traveled (VMT) per capita that is less than 85% of the regional average and is located within a high-quality transit area.
Senate Bill (SB) 375	SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the state's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035.	Consistent. As demonstrated in Table 4.8-4, the Project would comply with the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), and therefore, the Project would be consistent with SB 375.
Water		
CCR, Title 24, Building Standards Code	Title 24 includes water efficiency requirements for new residential and non- residential uses.	Mandatory Compliance. Refer to the discussion under 2019 Title 24 Building Standards Code and CALGreen Code, above.
Water Conservation Act of 2009 (Senate Bill X7-7)	The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment.	Consistent. Refer to the discussion under 2019 Title 24 Building Standards Code and CALGreen Code, above. Also, refer to Section 4.10, Hydrology and Water Quality.

Table 4.8-3 (continued)
Project Consistency with the 2017 Scoping Plan

Sector/Source	Category/Description	Consistency Analysis
Solid Waste		
California Integrated Waste Management Act (IWMA) of 1989 and Assembly Bill (AB) 341	The IWMA mandates that State agencies develop and implement an integrated waste management plan which outlines the steps to divert at least 50 percent of solid waste from disposal facilities. AB 341 directs the California Department of Resources Recycling and Recovery (CalRecycle) to develop and adopt regulations for mandatory commercial recycling and sets a Statewide goal for 75 percent disposal reduction by the year 2020.	Mandatory Compliance. The Project would be required to comply with AB 341 which requires multifamily residential dwelling of five units or more to arrange for recycling services. This would reduce the overall amount of solid waste disposed of at landfills. The decrease in solid waste would in return decrease the amount of methane released from decomposing solid waste.

Notes:
1. California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, Figure 4: California 2013 Anthropogenic Black Carbon Emission Sources, November 2017.
2. California Energy Commission, *2018 Power Content Label Southern California Edison,* https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_Southern_California_Edison.pdf, accessed June 24, 2020.
3. Southern California Edison, *The Clean Power and Electrification Pathway,* https://newsroom.edison.com/internal_redirect/cms.ipressroom.com.s3.amazonaws.com/166/files/20187/g17-pathway-to-2030-white-paper.pdf, accessed June 24, 2020.
4. California Energy Commission, *2013 California Energy Efficiency Potential and Goals Study*, Appendix Volume I, August 15, 2013.

2016-2040 RTP/SCS Consistency

At the regional level, the 2016-2040 RTP/SCS is adopted for the purpose of reducing GHGs resulting from vehicular emissions by passenger vehicles and light duty trucks. In order to assess the Project's consistency with the 2016-2040 RTP/SCS, the Project's land use assumptions are reviewed for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as the 2016-2040 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. Table 4.8-4, *Project Consistency with the 2016-2040 RTP/SCS*, analyzes the Project's consistency with the actions and strategies set forth in the 2016-2040 RTP/SCS. As indicated in Table 4.8-4, the Project would be consistent with the 2016-2040 RTP/SCS.

As indicated in Table 4.8-4, the Project would not generate GHG emissions that would have a significant impact on the environment or conflict with any applicable plans, policies, or regulations, including GHG reduction actions/strategies in the 2017 Scoping Plan and 2016-2040 RTP/SCS. Thus, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and impacts would be less than significant.

Table 4.8-4
Project Consistency with the 2016-2040 RTP/SCS

Sector/Source	Category/ Description	Consistency Analysis
Land Use Strategies		
Focus new growth around transit.	Local Jurisdictions	Consistent. The Project proposes higher density residential development within a high-quality transit area. The Project is located adjacent to Vermont Avenue, which is served by frequent transit routes with a bus stop located at 135th Street and Normandie Avenue.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG; Local Jurisdictions	Consistent. The Complete Communities strategy supports the creation of mixed-use districts through a concentration of activities with housing and employment located in close proximity to each other. The proposed Project would support this strategy by providing higher density residential uses within walking distance to employment opportunities (i.e., retail and restaurant uses). Neighborhood Mobility Areas provide sustainable transportation options to make short trips within urban neighborhoods. The Project would support this strategy by incorporating walking paths/sidewalks, and would be located within walking distance (i.e. 0.25-mile) to retail and restaurants.
Transportation Strategies		
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions; Local Jurisdictions	Not Applicable. This strategy applies to public agencies that govern transportation facilities and transportation programs.
Technological Innovation and 21st Century Transportation		
Promote zero-emissions vehicles.	SCAG; Local Jurisdictions	Not Applicable. This action/strategy is directed at regional and local agencies, and not at individual development projects. However, per the 2019 CALGreen Code Residential Mandatory Measure 4.106.4.2, the Project would be required to designate a minimum of ten percent of the total multifamily dwelling parking spaces as EV spaces.
Source: Southern California Association of Governments, *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, Chapter 5: The Road to Greater Mobility and Sustainable Growth, April 2016.		

Mitigation Measures: No mitigation measures are required.

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4.9 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Section 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

This section is based on the *Phase I Environmental Site Assessment and Shallow Soil Sampling* (Phase I ESA) prepared by Stantec Consulting Services, dated November 6, 2019 and included in its entirety as Appendix E, Phase I Environmental Site Assessment.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The Project involves construction activities associated with removal of existing structures and materials associated with nursery activities, grading, and construction and operation of a residential development. Refer to Response 4.9(b) regarding existing on-site conditions. Generally, the exposure of persons to hazardous materials could occur in the following manners: 1) improper handling or use of hazardous materials or hazardous wastes during construction or operation of future development, particularly by untrained personnel; 2) an accident during transport; 3) environmentally unsound disposal methods; or 4) fire, explosion or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

Construction activities associated with the proposed Project may involve the routine transport, use, or disposal of hazardous materials, such as petroleum-based fuels or hydraulic fluid used for construction equipment. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for hazards associated with the transport and use of hazardous materials. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and Federal law.

The Project does not involve the use or storage of hazardous substances other than limited quantities of hazardous materials such as solvents, fertilizers, pesticides, and other materials used for regular household maintenance of buildings and landscaping by homeowners and the Home Owner Association (HOA). The quantities of these materials would not typically be at an amount that would pose a significant hazard to the public or the environment. While the risk of exposure to hazardous materials cannot be eliminated, measures can be implemented to reduce risk to acceptable levels. Adherence to existing regulations would ensure compliance with safety standards related to the use and storage of hazardous materials, and the safety procedures mandated by applicable federal, State, and local laws and regulations, which would ensure that risks resulting from the routine transportation, use, storage, or disposal of hazardous materials or hazardous wastes associated with implementation of the proposed Project would be less than significant.

Mitigation Measures: No mitigation measures are required.

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?

Less Than Significant Impact with Mitigation Incorporated. A Phase I ESA (included as Appendix E), was prepared to identify adverse environmental conditions, including historical recognized environmental conditions (HRECs) and controlled recognized environmental conditions (CRECs) that may exist at the Project site. The term recognized environmental conditions (RECs) refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment.

Existing Site Conditions/Site Reconnaissance

As part of the Phase I ESA, a site reconnaissance was conducted, which focused on observation of current conditions and observable indications of past uses and conditions that may indicate the presence of a REC. The site is located in a mixed-used commercial and residential area; the surrounding properties consist of residential properties and a mobile home park. The Project site was observed to be developed with an asphalt parking lot, a single-story nursery store, and a tool shed that is also used as an employee breakroom. The northeastern portion of the site is developed with a single-story motel and asphalt parking lot. There are pole-mounted transformers located along the northern perimeter of the site.

Small amounts of herbicides/pesticides are for sale in the nursery store. The containers appeared to be in good condition and no indication of leaking or staining was observed. Interior and exterior observations of the site did not indicate any evidence of a hazardous conditions such as staining, corrosion, or signs of illegal dumping. No visible evidence of existing or former underground storage tanks/structures or aboveground storage tanks was observed. Additionally, historical use associated with adjoining properties providing indications of past use and activities were not observed.

Records Review

As part of the Phase I ESA, historical sources of information were reviewed to develop the history of the Project site and surrounding area in order to evaluate if past uses may have resulted in RECs. A regulatory agency database search report was obtained from EDR, a third-party environmental database search firm (refer to Appendix E for complete copy of the report). The Project site was not identified in the environmental database. Information from the database was also reviewed to evaluate the potential for conditions on an adjacent or nearby site to pose a REC, CREC, or HREC for the site. One facility, located to the south of the Project site, was listed as a closed Solid Waste Information Systems (SWIS) facility. However, further review indicates the facility is not listed on the SWIS online database and the EDR listing appears to be an error. The Phase I concluded the listing is not an environmental concern to the Project site. Further, based upon distance from the Project site, position of sites with respect to the assumed groundwater flow direction, the native soils, and regulatory status, the remaining listings in the database search report are not expected to affect soil or groundwater quality at the Project site. The environmental records search identified no RECs, HRECs, or de minimis conditions at or near the Project site.

Review of local and regional environmental records including the County of Los Angeles Fire Department, Los Angeles Regional Water Quality Control Board, Department of Toxic Substances Control, Division of Oil, Gas, and Geothermal Resources, City of Gardena and Los Angeles County Public Works, did not identify any RECs in connection with the Project site.

The review of historical aerial photographs indicates that a portion of the Project site has been developed as a plant nursery since circa 1960s. Prior to development, the site was used for agricultural purposes (i.e. strawberry fields). Agricultural use can be a potential concern due to the possible use of pesticides and herbicides containing heavy metals. Due to the historic use of the site, shallow soil samples were collected for analysis.

Four borings were performed at the Project site using a hand auger on October 28, 2019. Soil samples were collected from each soil boring at a depth of 0.5-1 foot below ground surface (bgs). Each soil sample was submitted for analysis of organochlorine pesticides by EPA Method 8081A and arsenic and lead by EPA Method 6010B.

The results of the analysis of the soil samples reported minor detections of the following organochlorine pesticides at concentrations below their corresponding United States Regional Screening Levels (US EPA RSLs) for residential sites: 4,4'-DDD; 4,4'-DDE; 4,4'-DDT; dieldrin; alpha-Chlordane; Chlordane; and gamma-Chlordane. Additionally, the cumulative total concentration for each shallow soil sample location is below the California Hazardous Waste Level. Therefore, the residual organochlorine pesticide concentrations are not considered an environmental concern to the Project site.

Arsenic was also reported in all four samples ranging from 2.0 to 4.1 milligrams per kilogram (mg/kg). While these samples are above the US EPA RSLs for residential sites of 0.68 mg/kg, they are all well within the typical naturally-occurring background levels for California, which range between 0.6 and 11.0 mg/kg. Lead was also detected in all of the four samples collected at concentrations ranging from 4.2 to 16 mg/kg. These detections are below the US EPA RSLs for residential sites of 80 mg/kg. The Phase I concluded that the historical agricultural use of the Project site does not represent a REC or a human health risk to proposed residential uses within the site and no further investigation regarding the environmental condition of the Project site is recommended.

On-Site Hazards Material Sources and Releases

One of the means through which human exposure to hazardous substance could occur is through accidental release. Incidents that result in an accidental release of hazardous substance into the environment can cause contamination of soil, surface water, and groundwater, in addition to any toxic fumes that might be generated. If not cleaned up immediately and completely, the hazardous substances can migrate into the soil or enter a local stream or channel causing contamination of soil and water. Human exposure of contaminated soil or water can have potential health effects on a variety of factors, including the nature of the contaminant and the degree of exposure.

Given the age of the existing building on the Project site (circa 1950s), the presence of lead-based paint (LBP) and asbestos-containing materials (ACMs) is considered likely. As a result, construction workers and the public could be exposed. Further, the potential exists that construction activities may release potential contaminants that may be present in building materials (e.g., mold, lead, etc.). Federal and State regulations govern the renovation and demolition of structures where ACMs and LBPs are present. All demolition that could result in the release of ACM or LBPs must be conducted according to Federal and State standards, including but not limited to, California Health and Safety Code Sections 17920.10 and 105256. The National Emission Standards for Hazardous Air Pollutants mandates that building owners conduct an asbestos survey to determine the presence of ACMs prior to the commencement of any remedial work, including demolition (Mitigation Measure HAZ-1). If ACM material is found, abatement of asbestos would be required prior to any demolition activities. If paint is separated from building materials (chemically or physically) during demolition of structures, the paint waste would be required to be evaluated independently from the building material by a qualified Environmental Professional If LBP is found, abatement would be required to be completed by a qualified Lead Specialist prior to any demolition activities. The Project would be required to comply with Conditions of Approval COA HAZ-1 and COA HAZ-2, as well as SCAQMD Rule 1403, regarding the potential for LBP and ACMs. Thus, impacts would be less than significant.

COA HAZ-1 Prior to demolition activities, an asbestos survey shall be conducted by an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified building inspector to determine the presence or absence of asbestos containing-materials (ACMs). The sampling method to be used shall be based

on the statistical probability that construction materials similar in color and texture contain similar amounts of asbestos. In areas where the material appears to be homogeneous in color and texture over a wide area, bulk samples shall be collected at discrete locations from within these areas. In unique or nonhomogeneous areas, discrete samples of potential ACMs shall be collected. The survey shall identify the likelihood that asbestos is present in concentrations greater than 1 percent in construction materials. If ACMs are located, abatement of asbestos shall be completed prior to any activities that would disturb ACMs or create an airborne asbestos hazard.

Asbestos removal shall be performed by a State certified asbestos containment contractor in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403. Common asbestos abatement techniques involve removal, encapsulation, or enclosure. The removal of asbestos is preferred when the material is in poor physical condition and there is sufficient space for the removal technique. The encapsulation of asbestos is preferred when the material has sufficient resistance to ripping, has a hard or sealed surface, or is difficult to reach. The enclosure of asbestos is to be applied when the material is in perfect physical condition, or if the material cannot be removed from the site for reasons of protection against fire, heat, or noise.

COA HAZ-2 If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste shall be evaluated independently from the building material by a qualified Environmental Professional. A portable, field X-ray fluorescence (XRF) analyzer shall be used to identify the locations of potential lead paint, and test accessible painted surfaces. The qualified Environmental Professional shall identify the likelihood that lead is present in concentrations greater than 1.0 milligrams per square centimeter (mg/cm2) in/on readily accessible painted surfaces of the buildings.

If lead-based paint is found, abatement shall be completed by a qualified Lead Specialist prior to any activities that would create lead dust or fume hazard. Potential methods to reduce lead dust and waste during removal include wet scraping, wet planning, use of electric heat guns, chemical stripping, and use of local High Efficiency Particulate Air (HEPA) exhaust systems. Lead-based paint removal and disposal shall be performed in accordance with California Code of Regulation Title 8, Section 1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. Contractors performing lead-based paint removal shall provide evidence of abatement activities to the City Engineer.

Mitigation Measures: No mitigation measures are required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The Project is located approximately 0.2-mile southwest of the 135th Street Elementary School site. The Project proposes a residential townhome development, which would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste.

Mitigation Measures: No mitigation measures are required.

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

No Impact. Government Code Section 65962.5 refers specifically to a list of hazardous waste facilities compiled by the Department of Toxic Substances Control (DTSC). According to the Phase I ESA, the Project site was not included in any regulatory agency database records; refer to Response 4.9(b). Additionally, the Project site is not included on the DTSC's hazardous waste and substances site list.[11] Therefore, the Project site has not been included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would not create a significant hazard to the public or the environment.

Mitigation Measures: No mitigation measures are required.

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?

No Impact. The Project site in not located within an airport land use plan, nor is the Project site located within two miles of a public airport or public use airport. Thus, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area.

Mitigation Measures: No mitigation measures are required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The City of Gardena Emergency Operations Plan (EOP) addresses the City's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The City's EOP establishes the emergency organization, assigns tasks, and specifies policies and general procedures. The EOP is designed to include Gardena in the overall California Standardized Emergency Management System (SEMS), which provides a framework for coordinating multi-agency responses in the case of emergencies. In the event of an emergency, first responders would coordinate any emergency response or emergency evacuation activities within the City.

Vermont Avenue provides direct access to the Project site and would serve as a primary evacuation and emergency access route within the area. The construction and operation of the proposed Project would not place any permanent physical barriers on Vermont Avenue. There is the potential that traffic lanes located immediately adjacent to the Project site may be temporarily closed or controlled by construction personnel during construction activities. Any temporary closure would be required to receive permission from the traffic authority in accordance with Gardena Municipal Code Section 13.56.430, *Road Closure or Interference with Highway Use*. However, this would be temporary and emergency access to the Project site and surrounding area would be required to be maintained along Vermont Avenue at all times. Additionally, all construction staging would occur within the boundaries of the Project site and would not interfere with circulation along Vermont Avenue, or any other nearby roadways.

[11] Department of Toxic Substances Control, *EnviroStor, Hazardous Waste and Substances Site List*, https://calepa.ca.gov/SiteCleanup/CorteseList/, accessed May 27, 2020.

The Project does not propose any modifications to Vermont Avenue. The Project would involve removal of existing driveways and construction of one primary driveway at the southeast portion of the Project site as well as removing and replacing all curb, gutter and sidewalk fronting the Project site. The proposed driveway would be gated with a visitor kiosk. Prior to the issuance of a building permit, the applicant is required to submit appropriate plans for plan review to ensure compliance with zoning, building, and fire codes. The Los Angeles County Fire Department (LACFD) has reviewed the Project for access requirements, minimum roadway widths, fire apparatus access roads, fire lanes, signage, access devices and gates, access walkways, among other requirements to ensure adequate emergency access would be provided to and within the Project site. The Project would be required to comply with all applicable Building and Fire Code requirements and would submit construction plans to the Fire Department's Engineering Building Plan Check Unit for review and approval prior to issuance of any building permit. Approval by the Fire Department would ensure that Project construction and operation would not impair implementation of or physically interfere with the City's EOP or emergency evacuation plan and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

g) 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 located within an urbanized area. The Project site and surrounding area are not within or located adjacent to any wildlands or areas identified as being at risk of wildland fires. Therefore, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Mitigation Measures: No mitigation measures are required.

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4.10 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project 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:				
1) Result in substantial erosion or siltation on- or off-site?			X	
2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			X	
3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
4) 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	

This section is based on the *Preliminary Hydrology Study Tentative Tract Map No. 83037* (Preliminary Hydrology Study) prepared by C&V Consulting Inc., dated March 2020 and *Preliminary Low Impact*

Development Plan (Preliminary LID Plan) prepared by C&V Consulting Inc., dated March 2020, included in their entirety as Appendix F, Preliminary Hydrology and Low Impact Development Plans and the *Percolation Study Proposed Residential Development, 13633 Vermont Avenue, Gardena, California*, prepared by Albus-Keefe & Associates, Inc., dated March 4, 2020 and included as Appendix G, Percolation Study.

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact.

Short-Term Construction

Short-term construction activities associated with the proposed Project could impact water quality. Sources of potential construction-related storm water pollution include handling, storage, and disposal of construction materials containing pollutants; maintenance and operation of construction equipment; and site preparation activities, such as excavation, grading and trenching. These sources, if not controlled, can generate soil erosion and on- and off-site transport via storm run-off or mechanical equipment. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other vehicle-related fluids on the Project site are also common sources of storm water pollution and soil contamination. Implementation of the proposed Project has the potential to produce typical pollutants such as nutrients, heavy metals, pesticides and herbicides, toxic chemicals related to construction and cleaning, waste materials including wash water, paints, wood, paper, concrete, food containers, and sanitary wastes, fuel, and lubricants. Generally, standard safety precautions for handling and storing construction materials can adequately reduce the potential pollution of storm water by these materials. These types of standard procedures can be extended to non-hazardous storm water pollutants such as sawdust, concrete washout, and other wastes.

Grading activities would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. Two general strategies are recommended to prevent soil materials from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed, and secondly, the Project site should be secured to control off-site transport of pollutants. In order to reduce the amount of on-site exposed soil, grading would be limited to the extent feasible, and any graded areas would be protected against erosion once they are brought to final grade. Furthermore, development associated with implementation of the proposed Project would be required to comply with the Construction General National Pollutant Discharge Elimination System (NPDES) Permit and the City of Gardena Municipal Code.

Construction-related erosion effects would be addressed through compliance with the NPDES program's Construction General Permit. Construction activity subject to this General Permit includes any construction or demolition activity, including, but not limited to, clearing, grading, grubbing, or excavation, or any other activity that results in a land disturbance of equal to or greater than 1.0 acre. The Project would disturb approximately 4.23 gross-acres and therefore would be subject to the General Permit. To obtain coverage under the General Permit, dischargers are required to file with the State Water Resources Control Board (SWRCB) the Permit Registration Documents (PRDs), which include a Notice of Intent (NOI) and other compliance-related documents. The General Permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion-control and sediment-control Best Management Practices (BMPs) that would meet or

exceed measures required by the General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized.

The Project would also be subject to Gardena Municipal Code Chapter 8.70, *Stormwater and Runoff Pollution Control*. Chapter 8.70 is intended to reduce the quality of pollutants being discharged to the waters of the United States through: the elimination of non-stormwater discharges to the municipal stormwater system; the elimination of discharge of pollutants into the municipal storm drain system; the reduction of pollutants in stormwater discharges to the maximum extent practicable; the protection and enhancement of the quality of the waters of the United States in a manner consistent with the provisions of the Clean Water Act. Section 8.70.110, *Pollutant Source Reduction*, states that no grading permit shall be issued to construction projects disturbing one or more acres of soil without obtaining a General Construction Activity Stormwater Permit (GCASP) from the SWRCB.

Compliance with the NPDES and Gardena Municipal Code requirements would ensure the Project's construction-related activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality, resulting in a less than significant impact.

Long-Term Operations

The City of Gardena discharges pollutants from its municipal separate storm sewer (drain) systems (MS4s). Stormwater and non-stormwater 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 as amended by State Water Board Order WQ 2015-0075 (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*.[12]

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 new or redeveloped residential projects that create, add, or replace 5,000 square feet or greater of impervious surface area. The Project involves approximately 4.23-gross acres of disturbed area and would result in the creation or addition or replacement of more than 5,000 square feet or more of impervious surface on a site that was previously developed and therefore would be required to comply with the Los Angeles's County LID Ordinance.

As stated, Gardena Municipal Code Chapter 8.70, *Stormwater and Runoff Pollution Control*, establishes the requirements to protect water quality. Section 8.70.110, *Pollutant Source Reduction*, requires new development and redevelopment projects subject to the MS4 permit, such as the proposed Project, to

[12] State Water Resources Control Board, Phase I MS4 Permits, Region 4, County of Los Angeles and the Incorporated Cities Therein except the City of Long Beach – Order No. R4-2012-0175 as amended by WQ Order 2015-0075, https://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_i_municipal.html, accessed June 23, 2020.

comply with post-construction runoff pollution reduction BMPs implemented through the Standard Urban Stormwater Mitigation Plan (SUSMP). The SUSMP requires low impact development (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. The SUSMP is required to be submitted to the City for review and approval and incorporated into the Project plans.

A Preliminary LID Plan has been prepared for the proposed Project (refer to Appendix F). The Preliminary LID Plan is intended to comply with the City's Conditions of Approval. The objectives of the LID Plan are to: determine the peak storm water runoff discharge rate; conserve natural and landscaped areas; minimize storm water pollutants of concern; protect slopes and channels; provide storm drain stenciling and signage; property design trash storage areas; provide proof of ongoing BMP maintenance; and design standards for structural or treatment control BMPs.

Anticipated pollutants from the residential component of the Project are nutrients, pesticides, sediments, trash and debris. Potential pollutants from parking lot areas include heavy metals, trash and debris and oil and grease. BMPs have been selected to address these pollutants.

The County of Los Angeles LID Standards Manual lists preference for selection of BMPs which includes retention-based stormwater quality control measures, biofiltration, vegetation-based storm quality control measures, and/or treatment-based stormwater quality control measures. The Preliminary LID Plan (Tables 1, 2, and 3) identify the Project's proposed site design BMPs, source control BMPs, and stormwater quality control BMPs that would be implemented.

The Project proposes implementation of a retention-based stormwater quality control measure in the form of a drywell with a pretreatment chamber. As infiltration is the primary mechanism for reducing stormwater runoff for all retention-based stormwater quality control measures, this mechanism was selected for the site. Stormwater would enter the drywell unit via curb openings throughout the site and flow via pipe directly onto a specially designed pretreatment chamber. The pretreatment chamber would be designed to intercept the majority of the first flows during a rain event and reduce the impact of sediment and debris on the system. After the pretreatment chamber is full, stormwater would flow into the main drywell system where it would be infiltrated. A detention system located upstream of the drywell would have a high-flow bypass inlet for flows greater than the 85th percentile storm event. Additionally, 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 drywell infiltration system.

Compliance with NPDES and Gardena Municipal Code requirements, which include implementation of LID BMPs, would ensure that Project operations would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

b) 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 City of Gardena, including the Project site, receives water from Golden State Water Company (GSWC). The City is located within GSWC's Southwest Customer Service Area, which serves approximately 55,000 customers. Water delivered to the Southwest System is a blend of groundwater pumped from the West and Central Coast Groundwater Basins and imported water from the Colorado River Aqueduct and State Water Project (imported and distributed by Metropolitan Water District of Southern California).[13]

The Southwest System receives its water supplies from imported water, GSWC operated groundwater wells, and recycled water. Imported water is purchased from the Central Basin Municipal Water District (CBMWD) and the West Basin Municipal Water District (WBMWD), which obtain their imported water supplies from the Metropolitan Water District of Southern California (Metropolitan). Water imported from CBMWD and WBMWD is delivered to the Southwest System through 13 connection with a combined capacity of 83,304 acre-feet per year (AFY). In 2015, the Southwest System imported water supplies were 21,024 acre-feet (AF).

Groundwater is supplied by two active, GSWC-owned wells in the Central Subbasin of the Coastal Plain of Los Angeles Groundwater Basin (commonly referred to as the Central Basin), and 10 active, GSWC-owned wells in the West Coast Subbasin of the Coastal Plain of Los Angeles Groundwater Basin (commonly referred to as the West Coast Basin). According to the GSWC 2015 Urban Water Management Plan – Southwest (UWMP), groundwater pumping for the Southwest System in 2015 totaled 5,915 AF, with 430 AF from the Central Basin and 5,484 AF from the West Coast Basin. Both the Central and West Coast Basins are adjudicated and are therefore subject to a maximum allowed pumping allocation for groundwater extraction across the entire Basins; refer to Response 4.10(e) regarding groundwater management.

In 2015, the Southwest area had a daily per capita water use of 87 gallons per capita per day (GPCD), which was below the 2015 water use target of 124 GPCD. As discussed in Response 4.10(e), the Project's water demand would total approximately 122 GPCD or 32.6 acre-feet per year (AFY). Although slightly greater than the 2020 interim target of 121 GPCD, this does not take into account water demand/use associated with the current on-site land uses. As stated, the Southwest area receives its water from imported water, groundwater and recycled water. Thus, the Project would not rely entirely on groundwater supplies. According to the UWMP, GSWC maintains an allocation of 16,439 AFY from the Central Basin and 7,502 AFY from the West Basin. The adjudicated basins would continue to be subject to the maximum allowed pumping allocation for groundwater extraction. Continued diligence by the pumpers is expected to ensure the reliability of the Central and West Coast Basins groundwater supplies. Therefore, the Project would not substantially deplete groundwater supplies.

The Project site currently contains 70 percent (2.92 acres) of pervious area and 30 percent (1.23 acres) of impervious area. In the proposed condition, the Project site would contain 14 percent (0.58 acres) of pervious area and 86 percent (3.56 acres) of impervious area. During final engineering, impervious area for the proposed condition would be calculated in greater detail based on the finalized landscape plan;

[13] Golden State Water Company, *Southwest*, https://www.gswater.com/southwest, accessed June 23, 2020.

however, the proposed Project would increase the impervious area when compared to existing conditions, potentially reducing groundwater recharge through infiltration.

As discussed above, the Project proposes an onsite drywell infiltration system to treat stormwater. The system would temporarily store and subsequently infiltrate stormwater runoff, allowing for treated stormwater to infiltrate into the groundwater. Thus, the Project would not interfere substantially with groundwater recharge and impacts would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

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:

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

2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

3) 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?

4) Impede or redirect flood flows?

Less Than Significant Impact. Refer to Response 4.10(a) regarding potential impacts involving erosion and water quality.

The Project site's existing drainage pattern is generally split into two areas: the motel in the northeast corner of the site and the nursery which encompasses the remainder of the site. The motel's drainage pattern generally sheet flows over the existing parking lot from east to west through a chain link fence at the parking lot's western end. Stormwater then flows onto the dirt lot of the adjacent on-site nursery. The nursery's drainage pattern consists of sheet flow over the existing developed parking lot, walkways, and planter beds. All flows from the nursery are collected by a single grate inlet catch basin located at the southwest corner of the site. The catch basin is connected to pipes that flow underneath the adjacent property and into Berendo Avenue.

In the existing condition there is cross-lot drainage from the apartment complex located to the north of the Project site. Flows from this lot are directed with ribbon gutters to the western edge of the lot where a natural swale conveys stormwater south onto the Project site. This cross-lot drainage is allowed per a drainage easement along the "westerly end" of the Project site. This drainage easement covers all lots in the Strawberry Park Tract to the north and south of the Project site; therefore, in the current condition flows are permitted from the north to the adjacent lot in the south.

Once stormwater travels through the grate inlet into Berendo Avenue, it flows in the street's curb and gutter to a City of Gardena-owned catch basin at the cul-de-sac on Berendo Avenue. These catch basins are connected to a Los Angeles County Flood Control (LACFCD) facility. This storm drain system ultimately outlets into the Dominguez Channel which is also an LACFCD Facility. Dominguez Channel then proceeds

in a south westerly direction and eventually outlets into the Dominguez Channel Estuary, then the Pacific Ocean.

Since all of the existing onsite stormwater runoff ultimately reaches a single location (the grate inlet in the southwestern portion of the Project site), the Preliminary Hydrology Study analyzed the existing site as a single drainage area to approximately quantify the runoff based on the longest hydraulic path from the most remote high point to grate inlet low point.

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

The Project proposes 84 3-story residential townhome units. The proposed development includes drive aisles, parking, landscaping, walkways, patios, and common open space areas. The site would be graded to collect runoff at one low point to control the amount of imported fill during grading and maintain the entire site drainage pattern.

Table 4.10-1, *Hydrology Summary*, provides the existing and proposed condition stormwater peak flows. As indicated in Table 4.10-1, the proposed conditions stormwater peak flow for the different year storm event frequencies would increase when compared to the existing condition primarily due to the change in impervious area associated with development of the Project. The onsite detention required to mitigate the proposed condition peak flow rate during the 100-year storm event was calculated and determined to be 269 cubic feet (cf). The Project proposes a drywell system (described below) that would meet the required water quality treatment while detaining more than the 269 cf of stormwater required to mitigate the proposed condition.

Table 4.10-1
Hydrology Summary

Condition	Drainage Area	Q_{25} (cfs)	Q_{50} (cfs)	Q_{100} (cfs)	Tc (min)
Existing Condition	XA1	7.2818	9.5875	10.7854	7
Cross-Lot Drainage	OA1	3.0158	3.6582	4.1045	7
Proposed Condition	A1	2.769	3.2884	3.9286	7
	A2	5.6929	6.8959	8.2383	7
Total		8.57	10.2	12.17	--
Percent Change		**+17.7%**	**+6.3%**	**+11.9%**	
Source: C&V Consulting Inc., *Preliminary Hydrology Study Tentative Tract Map No. 83037*, March 2020.					

The proposed development would utilize onsite catch basins, infiltration systems, and a detention vault system to capture and treat stormwater. Stormwater up to the design capture volume would be infiltrated by a proposed onsite drywell system. Larger storm events would bypass the infiltration system and

overflow into a proposed swale which follows an existing drainage easement located along the western property line. Once stormwater enters this swale the existing grate inlet would convey stormwater into Berendo Avenue via the existing underground storm drain piping system. Any flows not captured by the existing grate inlet would continue south following the existing drainage pattern within the drainage easement located along the westerly edge of all lots in the Strawberry Park Tract.

Stormwater runoff would be conveyed via proposed onsite gutters and directed to one sump area equipped with a curb inlet catch basin. The catch basin would be located at the end of the drive aisles at the western property line. There would be two other catch basins located within the site with local depressions. These catch basins would be in a flow-by condition and connected by storm drain pipe to the drywell infiltration system for water quality treatment. During larger storm events, stormwater runoff would back up the drywell system which is connected to the underground detention system. Runoff would be piped through a proposed retaining wall into a swale located on the western edge of the property. For emergency overflow, runoff would spill out of the proposed curb inlet catch basin and surface flow through the wall knockouts in the adjacent retaining wall spilling into the swale.

In order to address the existing cross-lot drainage condition, a drainage swale is proposed in the existing drainage easement located along the westerly property line. This swale would convey any drainage from the adjacent property to an existing drainage device located at the southwestern edge of the Project site. Any excess flow would continue south and follow the existing drainage pattern and easement.

In an event where the proposed onsite storm drain system is at its full capacity or clogged, stormwater would pond up at the proposed onsite sump area and excess stormwater would top over the curb to continue to flow out through proposed wall knockouts in the retaining wall at the southwest corner of the site. This would then spill into the swale along the western property line where it would be intercepted by the grate inlet catch basin or continue south along the existing drainage easement.

In accordance with the Los Angeles County Department of Public Works Hydrology Manual all habitable structures must have a finished floor elevation to allow one foot of freeboard during the 100-year storm event and the drop inlet catch basin and onsite conveyance storm drain pipes would 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.

There are no streams or rivers near the Project site. The Project's proposed storm drain system would provide a detention system that would capture excess flows generated as a result of the Project's proposed condition; thus, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding, create or contribute runoff that would exceed the capacity of the existing drainage system, or impede or redirect flood flows. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. According to the Federal Emergency Management Agency, Flood Insurance Rate Map, the Project site is located within an area of minimal flood hazard.[14] Tsunamis are sea waves that are generated in response to large-magnitude earthquakes, which can result in coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. The Project site is approximately 7.0 miles northeast of the Pacific Ocean and there are no large bodies of standing water near the Project site. As a result, 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 site is not located within a flood hazard, tsunami or seiche zones potentially resulting in a release of pollutants due to Project Inundation; impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. Refer to Responses 4.10(a) and 4.10(c), above regarding water quality. As discussed above, the Southwest System is supplied by two active, GSWC-owned wells in the Central Subbasin, and 10 active, GSWC-owned wells in the West Coast Subbasin. GSWC monitors well capacity, status, and water quality. In 2014, the California Sustainable Groundwater Management Act (SGMA) was passed. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans (GSPs) for crucial groundwater basins in California.[15] 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.[16]

According to the UWMP, the Central Basin adjudication limit (total of the allowed pumping allocations [APA] of each party) for groundwater extraction across the entire basin is 217,367 AFY. GSWC maintains an APA of 16,439 AFY. GSWC's APA is shared between all of their systems that extract groundwater from the Central Basin. GSWC reports total groundwater extractions (on a per-well basis) to the Watermaster. 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 pumpers in the Central Basin. 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. GSWC reports monthly groundwater extractions (on a per-well basis) to the Watermaster.

Groundwater pumping for the Southwest System in 2015 totaled 5,915 AF, with 430 AF from the Central Basin and 5,484 AF from the West Coast Basin, which is less than the allocation of 16,439 AFY from the Central Basin and 7,502 AFY from the West Basin. As GSWC's groundwater rights are adjudicated, the

[14] Federal Emergency Management Agency, Flood Insurance Rate Map 06037C1795F, effective September 26, 2008, https://msc.fema.gov/portal/home, accessed July 2, 2020.
[15] California Department of Water Resources, *SGMA Groundwater Management*, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed July 10, 2020.
[16] Golden State Water Company, *2015 Urban Water Management Plan – Southwest*, September 2016.

Project would not conflict with or exceed groundwater supplies or management of the groundwater basins.

The Water Conservation Act of 2009 (SBX7-7) requires increased emphasis on water demand management and requires the State to achieve a 20 percent reduction in urban per capita water use by December 31, 2020; reporting began with the 2010 UWMP. Retail urban water suppliers are required to report their Baseline Daily Per Capita Water Use (Baseline GPCD), 2015 interim Urban Water Use Target, 2020 Urban Water Use Target, and Compliance Daily per Capita Water Use. UWMP Table 5-2, shows the compliance water use target for the GSWC Southwest System as 121 GPCD. The Interim Water Use Target for 2015 is set as a halfway point between the Base Daily Water Use GPCD and the 2020 Compliance Water Use Target GPCD and is 124 GPCD. The Southwest System's water use in 2015 was 87 GPCD, well below the SBX7-7 2015 interim target of 124 GPCD and the 2020 target of 121 GPCD. GSWC anticipates continuing to meet its 2020 target through current and future Demand Management Measures.

The Project involves the development of 84 townhome units. Based on 2.83 persons per household, the Project's forecast population growth is approximately 238 persons, which would generate a water demand of approximately 122 GPCD or 32.6 AFY. Although slightly greater than the 2020 interim target of 121 GPCD, this does not take into account water demand/use associated with the current on-site land uses. Additionally, the Project's water demand, if solely taken from groundwater resources, would represent 0.14 percent of the Southwest Systems total 2015 groundwater supply and 0.55 percent of the total groundwater pumped by the Southwest System in 2015. The City would continue to comply with SBx7-7 requirements, which aim to reduce urban water usage. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.11 Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	

a) Physically divide an established community?

No Impact. The Project site is currently developed with a retail garden center and commercial container nursery and a motel. Residential uses are located immediately adjacent to the north, west, and south of the Project site. Additionally, residential uses, within the City of Los Angeles, are located east of the site, east of Vermont Avenue. The Project proposes to remove the existing on-site uses and develop 84 townhomes. The Project would not involve any roadways or significant infrastructure systems that would physically divide the site or separate the site from surrounding uses. Development of the site, as proposed, would provide a continuation of residential uses that occur within the surrounding area. Thus, no impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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?

Less Than Significant Impact. According to the City of Gardena Land Use Map (General Plan Land Use Element Figure LU-2), the Project site is designated General Commercial. The General Commercial land use designation provides for a wide range of larger scale commercial uses to serve both the needs of the City and the region. It is intended for commercial uses such as regional retail, automobile dealerships, supermarkets, junior department stores, financial centers, professional offices, restaurants, and other commercial uses oriented to the traveling public. The maximum permitted floor area ratio (FAR) is 0.5.

The City of Gardena Zoning Map identifies the zoning for the Project site as General Commercial (C-3). The Gardena Municipal Code, Chapter 18.32, *General Commercial Zone (C-3)*, states the C-3 zone is intended for general commercial uses and identifies the permitted uses and property development standards for properties within the C-3 zone.

The Project proposes a residential community comprised of 84 three-story attached townhomes, including two affordable units, and associated amenities, which are not permitted uses within the C-3 zone. The Project proposes a General Plan Amendment (GPA) and a Zone Change (ZC) to change the General Plan land use designation from General Commercial to High Density Residential and to change the zoning from C-3 to High Density Multiple Family Residential Zone (R-4).

Gardena Municipal Code Chapter 18.18, *High Density Multiple-Family Residential Zone (R-4)*, establishes the development standards for the R-4 Zone, including lot area, width and depth; minimum and maximum permitted densities; building heights and setbacks; and distances between buildings. Within the R-4 zone, a minimum lot area of 5,000 square feet, minimum lot width of 50 feet for interior lots and a minimum lot depth of 80 feet are required. The Project site is approximately 4.23-acres and exceeds the minimum lot area, width, and depth requirements. The minimum permitted density in the R-4 zone is 20 dwelling units/acre and the maximum permitted density is 30 dwelling units/acre for lots greater than one acre. The Project proposes to develop 84 townhome units on the approximately 4.23-gross acre site at a density of 20.8 dwelling units per gross acre. Therefore, the proposed Project would be within the minimum (20 dwelling units/acre) and maximum densities (30 dwelling units/acre) allowed. The maximum building height allowed in the R-4 zone is 40 feet for habitable space with an additional five feet allowed for architectural projections; no building may exceed four stories. The Project would have a maximum height of 40 feet (to roof ridge) and the Project would be three stories. The Project would be required to provide a minimum front yard setback of 15 feet with no more than 50 percent, including driveways, being paved. A minimum side yard setback of five feet and minimum rear yard setback of 15 feet since the building exceeds 35 feet in height and the property directly buts parcels zoned R-1. The Project proposes to provide a front yard setback of 20 feet, minimum side yard setback of 12 feet and a minimum rear yard setback of 22 feet 9 inches. Side to side attached condominium buildings with a building height of 40 feet or less are required to have a distance of 10 feet between buildings. The Project proposes a minimum distance of 15 feet between the buildings.

Gardena Municipal Code Chapter 18.40, *Off-Street Parking and Loading*, establishes the minimum standards for the development of off-street parking facilities. Section 18.40.040, *Number of parking spaces required*, requires two spaces per dwelling unit, other than a studio unit, one of which must be in an enclosed garage or parking structure and the other which may be in a covered parking area for high-density multiple-family dwellings (anything over 20 units per acre). One space per dwelling unit is required for studio units. Section 18.040.070, *Additional Standards for Residential Parking Areas*, requires guest parking be provided for residential developments of more than one unit at one-half parking space per dwelling unit. The Project proposes 84 townhomes with two- to four-bedroom options, with the exception of two units which would be one bedroom and a den. The Project would require two enclosed spaces for each of the 82 market rate units and one enclosed space for each of the 2 affordable units for a total of 166 enclosed spaces. An additional 41 guest spaces would be required based on the market rate units. The Project proposes attached two car garages for the 82 two- to four-bedroom (market rate) units and attached single-car garages for the one-bedroom (affordable) units. An additional 42 open parking stalls (including four ADA spaces) would be distributed throughout the site. The Project would be consistent with the City's development standards.

Gardena Municipal Code Chapter 18.44, *Site Plan Review*, requires site plans be submitted for any development project requesting a GPA, ZC, Conditional Use Permit (CUP), variance, tract map, or other discretionary permit. As discussed in Section 2.0, the Project is requesting a GPA, ZC, and Tentative Tract Map (TTM). In accordance with Gardena Municipal Code Section 18.44.030, *Factors for approval*, the Site Plan would only be approved (or conditionally approved) after finding that the proposed development, including the physical design of the development, is consistent with the intent and general purpose of the Gardena General Plan and provisions of the Gardena Municipal Code.

In addition to Site Plan Review, the Project would be required to comply with Gardena Municipal Code Chapter 17.08, *Procedures and Standards*, which addresses, in part, the processing, requirements, and

procedures for tentative maps. In accordance with Section 17.08.020, a subdivider is required to 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 planning and environmental quality commission's secretary. Such tentative map shall be processed in accordance with the Subdivision Map Act and the provisions of Chapter 17.08. The Project proposes TTM #2-20 (TTM No. 83037) for Condominium Purposes.

Following the City's approval of the requested GPA #2-20, ZC #2-20, TTM #2-20 (TTM No. 83037), and Site Plan Review SPR #3-20, the Project would be consistent with the Gardena General Plan and Gardena Municipal Code. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.12 Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

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?

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?

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. According to the Gardena General Plan, the State Division of Mines and Geology has not designated any lands within the City as a State classified mineral resources deposit area. In addition, no areas within the City are designated for mineral resources extraction.

Mitigation Measures: No mitigation measures are required.

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4.13 Noise

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of 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. Generation of excessive groundborne 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

This section is based on the *Evergreen Townhomes Development Noise Impact Study* (Noise Study), prepared by MD Acoustics, dated September 4, 2020 and included in its entirety as Appendix H, Noise Study.

FUNDAMENTALS OF NOISE

Sound, Noise, Acoustics

Sound is a disturbance created by a moving or vibrating source and is capable of being detected by the hearing organs. Sound may be thought of as mechanical energy of a moving object transmitted by pressure waves through a medium to a human ear. For traffic, or stationary noise, the medium of concern is air. Noise is defined as sound that is loud, unpleasant, unexpected, or unwanted.

Frequency and Hertz

A continuous sound is described by its frequency (pitch) and its amplitude (loudness). Frequency relates to the number of pressure oscillations per second. Low-frequency sounds are low in pitch (bass sounding) and high-frequency sounds are high in pitch (squeak). These oscillations per second (cycles) are commonly referred to as Hertz (Hz). The human ear can hear from the bass pitch starting out at 20 Hz all the way to the high pitch of 20,000 Hz.

Sound Pressure Levels and Decibels

The amplitude of a sound determines it loudness. The loudness of sound increases or decreases as the amplitude increases or decreases. Sound pressure amplitude is measured in units of micro-Newton per

square inch meter (N/m2), also called micro-Pascal (µPa). One µPa is approximately one hundred billionths (0.00000000001) of normal atmospheric pressure. Sound pressure level (SPL or Lp) is used to describe in logarithmic units the ratio of actual sound pressures to a reference pressure squared. These units are called decibels abbreviated dB.

Addition of Decibels

Because decibels are on a logarithmic scale, sound pressure levels cannot be added or subtracted by simple plus or minus addition. When two sounds or equal SPL are combined, they will produce an SPL 3 dB greater than the original single SPL. In other words, sound energy must be doubled to produce a 3 dB increase. If two sounds differ by approximately 10 dB, the higher sound level is the predominant sound.

Human Response to Changes in Noise Levels

In general, the healthy human ear is most sensitive to sounds between 1,000 Hz and 5,000 Hz, (A weighted scale) and it perceives a sound within that range as being more intense than a sound with a higher or lower frequency with the same magnitude. For purposes of this analysis, the A-scale weighting is typically reported in terms of A-weighted decibel (dBA). Typically, the human ear can barely perceive the change in noise level of 3 dB. A change in 5 dB is readily perceptible, and a change in 10 dB is perceived as being twice or half as loud. As previously discussed, a doubling of sound energy results in a 3 dB increase in sound, which means that a doubling of sound energy (e.g. doubling the volume of traffic on a highway) would result in a barely perceptible change in sound level.

Noise Descriptors

Noise in our daily environment fluctuates over time. Some noise levels occur in regular patterns, others are random. Some noise levels are constant while others are sporadic. Noise descriptors were created to describe the different time-varying noise levels.

A-Weighted Sound Level: The sound pressure level in decibels as measured on a sound level meter using the A-weighted filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the response of the human ear. A numerical method of rating human judgment of loudness.

Ambient Noise Level: The composite of noise from all sources, near and far. In this context, the ambient noise level constitutes the normal or existing level of environmental noise at a given location.

Community Noise Equivalent Level (CNEL): The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five (5) decibels to sound levels in the evening from 7:00 PM to 10:00 PM and after addition of ten (10) decibels to sound levels in the night before 7:00 AM and after 10:00 PM.

Decibel (dB): A unit for measuring the amplitude of a sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micro-pascals.

dB(A): A-weighted sound level (see definition above).

Equivalent Sound Level (LEQ): The sound level corresponding to a steady noise level over a given sample period with the same amount of acoustic energy as the actual time varying noise level. The energy average noise level during the sample period.

Habitable Room: Any room meeting the requirements of the Uniform Building Code or other applicable regulations which is intended to be used for sleeping, living, cooking or dining purposes, excluding such enclosed spaces as closets, pantries, bath or toilet rooms, service rooms, connecting corridors, laundries, unfinished attics, foyers, storage spaces, cellars, utility rooms and similar spaces.

L(n): The A-weighted sound level exceeded during a certain percentage of the sample time. For example, L10 is the sound level exceeded 10 percent of the sample time. Similarly, L50, L90 and L99, etc.

Noise: *A*ny unwanted sound or sound which is undesirable because it interferes with speech and hearing, or is intense enough to damage hearing, or is otherwise annoying. The State Noise Control Act defines noise as "...excessive undesirable sound...".

Outdoor Living Area: Outdoor spaces that are associated with residential land uses typically used for passive recreational activities or other noise-sensitive uses. Such spaces include patio areas, barbecue areas, jacuzzi areas, etc. associated with residential uses; outdoor patient recovery or resting areas associated with hospitals, convalescent hospitals, or rest homes; outdoor areas associated with places of worship which have a significant role in services or other noise-sensitive activities; and outdoor school facilities routinely used for educational purposes which may be adversely impacted by noise. Outdoor areas usually not included in this definition are: front yard areas, driveways, greenbelts, maintenance areas and storage areas associated with residential land uses; exterior areas at hospitals that are not used for patient activities; outdoor areas associated with places of worship and principally used for short-term social gatherings; and, outdoor areas associated with school facilities that are not typically associated with educational uses prone to adverse noise impacts (e.g., school play yard areas).

Percent Noise Levels: See L(n).

Sound Level (Noise Level): The weighted sound pressure level obtained by use of a sound level meter having a standard frequency-filter for attenuating part of the sound spectrum.

Sound Level Meter: An instrument, including a microphone, an amplifier, an output meter, and frequency weighting networks for the measurement and determination of noise and sound levels.

Single Event Noise Exposure Level (SENEL): The dB(A) level which, if it lasted for one second, would produce the same A-weighted sound energy as the actual event.

Traffic Noise Prediction

Noise levels associated with traffic depends on a variety of factors: (1) volume of traffic, (2) speed of traffic, (3) auto, medium truck (2–3 axle) and heavy truck percentage (4 axle and greater), and sound propagation. The greater the volume of traffic, higher speeds, and truck percentages equate to a louder volume in noise. A doubling of the Average Daily Traffic (ADT) along a roadway will increase noise levels by approximately 3 dB.

Sound Propagation

As sound propagates from a source it spreads geometrically. Sound from a small, localized source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates at a rate of 6 dB per doubling of distance. The movement of vehicles down a roadway makes the source of the sound appear to propagate from a line (i.e., line source) rather than a

point source. This line source results in the noise propagating from a roadway in a cylindrical spreading versus a spherical spreading that results from a point source. The sound level attenuates for a line source at a rate of 3 dB per doubling of distance.

As noise propagates from the source, it is affected by the ground and atmosphere. Noise models use hard site (reflective surfaces) and soft site (absorptive surfaces) to help calculate predicted noise levels. Hard site conditions assume no excessive ground absorption between the noise source and the receiver. Soft site conditions such as grass, soft dirt or landscaping attenuate noise at a rate of 1.5 dB per doubling of distance. When added to the geometric spreading, the excess ground attenuation results in an overall noise attenuation of 4.5 dB per doubling of distance for a line source and 7.5 dB per doubling of distance for a point source.

Research has demonstrated that atmospheric conditions can have a significant effect on noise levels when noise receivers are located 200 feet from a noise source. Wind, temperature, air humidity and turbulence can further impact have far sound can travel.

GROUND-BOURNE VIBRATION FUNDAMENTALS

Vibration Descriptors

Ground-borne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. The effects of ground-borne vibrations typically only cause a nuisance to people, but at extreme vibration levels, damage to buildings may occur. Although ground-borne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. Ground-borne noise is an effect of ground-borne vibration and only exists indoors, since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves.

Several different methods are used to quantify vibration amplitude.

- PPV – Known as the peak particle velocity (PPV) which is the maximum instantaneous peak in vibration velocity, typically given in inches per second.
- RMS – Known as root mean squared (RMS) can be used to denote vibration amplitude.
- VdB – A commonly used abbreviation to describe the vibration level (VdB) for a vibration source.

Vibration Perception

Typically, developed areas are continuously affected by vibration velocities of 50 VdB or lower. These continuous vibrations are not noticeable to humans whose threshold of perception is around 65 VdB. Outdoor sources that may produce perceptible vibrations are usually caused by construction equipment, steel-wheeled trains, and traffic on rough roads, while smooth roads rarely produce perceptible groundborne noise or vibration. To counter the effects of ground-borne vibration, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to the FTA, fragile buildings can be exposed to ground-borne vibration levels of 0.3 inches per second without experiencing structural damage. 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.

There are three main types of vibration propagation: surface, compression, and shear waves. Surface waves, or Rayleigh waves, travel along the ground's surface. These waves carry most of their energy along an expanding circular wave front, similar to ripples produced by throwing a rock into a pool of water. P-waves, or compression waves, are body waves that carry their energy along an expanding spherical wave front. The particle motion in these waves is longitudinal (i.e., in a "push-pull" fashion). P-waves are analogous to airborne sound waves. S-waves, or shear waves, are also body waves that carry energy along an expanding spherical wave front. However, unlike P-waves, the particle motion is transverse, or side-to-side and perpendicular to the direction of propagation.

As vibration waves propagate from a source, the vibration energy decreases in a logarithmic nature and the vibration levels typically decrease by 6 VdB per doubling of the distance from the vibration source. As stated above, this drop-off rate can vary greatly depending on the soil but has been shown to be effective enough for screening purposes, in order to identify potential vibration impacts that may need to be studied through actual field tests.

EXISTING NOISE ENVIRONMENT

Stationary Sources

Stationary noise sources within the Project site and vicinity are primarily those associated with surface parking, loading/unloading activities, and mechanical equipment (e.g., heating ventilation and air condition [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

Noise measurements are taken to determine the existing noise levels. A noise receiver or receptor is any location in the noise analysis in which noise might produce an impact. Noise monitoring locations were selected based on the distance from Vermont Ave to the nearest sensitive on-site receptors. Four short-term noise measurements were conducted near the property lines of the Project site and are illustrated in Exhibit 4.13-1, *Noise Measurement Locations*. The measurements measured the 1-hour Leq, Lmin, Lmax and other statistical data (e.g. L2, L8); refer to Table 4.13-1, *Short-Term Noise Measurement Data (dBA)*. As indicated in Table 4.13-1, ambient noise levels range between 45.2 and 63.2 dBA Leq.

Table 4.13-1
Short-Term Noise Measurement Data (dBA)

Location	Start Time[1]	Leq	Lmax	Lmin	L(2)	L(8)	L(25)	L(50)
Site 1	10:48 AM	63.2	76.1	46.1	71.4	68.2	64.2	57.2
Site 2	10:55 AM	45.2	73.8	39.3	47.7	44.4	42.4	41.2
Site 3	11:06 AM	46.1	54.6	41.6	51.9	49.1	46.1	44.8
Site 4	11:18 AM	46.4	57.7	43.2	51.1	48.2	46.3	45.4

Notes:
1. Measurements taken on April 30, 2020 over a ten-minute interval.

Legend

Project Boundary

\# Noise Measurement Location

0 25 50

Feet

Sources: Los Angeles County; ArcGIS Online Clarity Image Map Service; Evergreen Townhomes Development Noise Impact Study. Map date: July 20, 2020.

CITY OF GARDENA - EVERGREEN RESIDENTIAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Exhibit 14.3-1
Noise Measurement Locations

De Novo Planning Group
A Land Use Planning, Design, and Environmental Firm

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 nearest to the Project site consist of residential uses to the north, south, and west.

REGULATORY FRAMEWORK

City of Gardena General Plan

Applicable policies and standards governing environmental noise in the City are set forth in the General Plan Noise Element. Table N-1 of the Gardena Noise Element outlines the interior and exterior noise standards for community noise environments. According to Table N-1 residential noise limits are 45 dBA CNEL interior and 65 dBA CNEL exterior. It should be noted that if exterior levels exceed this limit, the architectural design should be such that interior noise levels are not greater than 45 dBA. In addition to the noise standards, the City has outlined goals, policies and implementation measures to reduce potential noise impacts.

The City of Gardena General Plan regulates construction noise. The impact of construction noise that occurs during the daytime is considered minimal for no more than two or three months of activity. However, late night and weekend disturbances caused by construction noise may create a significant impact when experienced at nearby residential locations.

City of Gardena Municipal Code

Gardena Municipal Code Section 8.36.040, *Exterior noise standards*, and 8.36.050, *Interior noise standards* state the exterior and interior noise standards for the City in terms of Leq(15) and Lmax. The allowable noise levels at land uses receiving noise are summarized in Table 4.13-2, *Allowable Exterior and Interior Noise Levels*. The Gardena Municipal Code states that if the ambient noise level exceeds the noise standard, then the ambient noise level shall become the noise standards. Gardena Municipal Code Section 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.

Gardena Municipal Code Section 8.36.080, *Exemptions*, exempts noise associated with construction, repair, remodeling, grading or demolition of any real property from the City's noise limitations, provided these activities do not take place between the hours of 6:00 p.m. and 7:00 a.m. on weekdays; between the hours of 6:00 p.m. and 9:00 a.m. on Saturday; or any time on Sunday or a Federal holiday.

Table 4.13-2
Allowable Exterior and Interior Noise Levels

Type of Land Use	15-Minute Average Noise Level (Leq(15))		Maximum Noise Level (Lmax)	
	7 am – 10 pm	10 pm to 7 am	7 am – 10 pm	10 pm to 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 and 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, Municipal Code, Sections 8.36.040 and 8.36.050.				

a) Generation of 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

The degree of construction noise may vary for different areas of the Project site and also vary depending on the construction activities. Noise levels associated with the construction would vary with the different phases of construction. Typical noise levels associated with construction equipment are shown in Table 4.13-3, *Typical Construction Noise 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 one or two minutes of full power operation followed by three to four minutes at lower power settings. Noise levels would be loudest during grading phase. A likely worst-case construction noise scenario during grading assumes the use of a grader, a dozer, an excavator, and three backhoes operating at 260 feet (center of the Project site) from the nearest residential sensitive receptors to the west of the site.

Construction noise would have a temporary or periodic increase in the ambient noise level above existing noise levels within the Project vicinity. Construction noise is considered a short-term impact and would be considered significant if construction activities occur outside the allowable times as described in the City's General Plan and Municipal Code. However, Project construction would occur during the permissible hours in accordance with the City's General Plan and Municipal Code. Thus, construction impacts would not be considered significant. With implementation of recommended conditions of approval, construction-related noise would be further reduced. Implementation of recommended

conditions of approval include ensuring construction equipment is equipped with noise attenuating devices and would also require orientation of stationary construction equipment away from nearby sensitive receptors, among other requirements.

Table 4.13-3
Typical Construction Noise Levels

Type	Noise Levels (dBA) at 50 Feet[1]
Earth Moving	
Compactors (Rollers)	73-76
Front Loaders	73-84
Backhoes	73-92
Tractors	75-95
Scrapers, Graders	78-92
Pavers	85-87
Trucks	81-94
Materials Handling	
Concrete Mixers	72-87
Concrete Pumps	81-83
Cranes (Movable)	72-86
Cranes (Derrick)	85-87
Stationary	
Pumps	68-71
Generators	71-83
Compressors	75-86
Impact Equipment	
Saws	71-82
Vibrators	68-82
Notes: 1. Referenced Noise Levels from the Environmental Protection Agency (EPA)	

OPERATIONAL NOISE

Stationary Noise Sources

The Project proposes to replace an existing retail garden center and commercial container nursery and a motel and construct a residential community comprised of 84 three-story attached townhomes and associated amenities. Noise typical of residential uses include conversations, pet noise, and general maintenance activities. Noise from residential stationary sources would primarily occur during the "daytime" activity hours of 7:00 AM to 10:00 PM and would be required to comply with the Gardena General Plan and Municipal Code noise standards. The Project site is generally surrounded by residential uses, with the exception of Vermont Avenue, which forms the site's eastern boundary. Mechanical equipment (e.g., heating ventilation and air conditioning [HVAC] equipment) would be the primary stationary noise source within the Project site.

The future worst-case noise level projections were modeled using referenced sound level data for the on-site stationary sources (HVAC equipment). The model assumes a total of 84 air conditioning units are

operating simultaneously (worst-case scenario). The Noise Analysis utilized a reference noise level of 68 dBA at 3-feet away from the HVAC units, as it represents an average noise level from a sample set of HVAC unit data. Typical HVAC noise level ranges between 62 to 77 dBA at 3 to 5 feet from the unit. A total of four (4) receptors were modeled using the SoundPLAN noise model to evaluate the proposed Project's operational impact; refer to Appendix H. Project only operational noise levels at the adjacent residential uses are anticipated to range between 35.4 dBA to 36.4 dBA Leq (depending on the location), which is below the City's 55 dBA residential limit. The Project plus ambient noise level projections (45.2 dBA to 46.1 dBA) are anticipated to range between 45.7 and 46.5 dBA Leq. Thus, the Project would increase the worst-case noise level by 0.4 to 0.5 dBA Leq at the adjacent residential uses. As stated, an increase in 1 dB is not perceptible and an increase of 3 dB is just perceptible. Thus, the Project's contribution to existing noise levels would be within the "not perceptible" acoustic characteristic and impacts would be less than significant. As noted, the Noise Analysis utilized a reference noise level based on a sample set of HVAC unit data. As a condition of approval, the Project applicant would be required to demonstrate compliance with the City's noise ordinance as it relates to the specific Project HVAC units. It is noted that compliance with the City's noise ordinance would be achieved by implementing a HVAC system with a noise level ranging between 62 to 77 dBA.

Nominal parking noise would occur within the on-site shared driveways and visitor parking stalls. 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 Vermont Avenue. Actual noise levels resulting from parking activities are anticipated to be far below the City's noise standards. As a conservative measure the Noise Analysis has compared the worst-case Project daytime noise levels with the measured ambient levels. The Project noise level is approximately 10 dB below the existing ambient noise level, and the total combined noise level is below both the 55 dBA daytime noise limit and the 50 dBA nighttime noise limit. Therefore, the Project would comply with the City's noise regulations and impacts associated with Project stationary noise would be less than significant.

Off-Site Traffic Noise

The proposed Project would generate traffic volumes along Vermont Avenue. The Project would result in 457 average daily trips (ADT). The trip generation is conservative given trip credits for the existing land uses that would be displaced have not been applied. 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. The Circulation Element classifies Vermont Avenue as an Arterial. Arterials typically carry between 40,000 and 60,000 vehicles per day.[17] The Gardena General Plan EIR identified 2006 traffic volumes on Vermont Avenue between 135th Street and Rosecrans Avenue to be 21,900 vehicles per day and forecast traffic volumes along the same roadway segment to be 23,650 vehicles per day by 2025.[18] Thus, the Project's 457 ADTs would not result in a doubling of trips along Vermont Avenue.

Further, the potential off-site noise impacts caused by the increase in vehicular traffic as a result of the Project were calculated at a distance of 50 feet. The distance to the 55, 60, 65, and 70 dBA CNEL noise contours are also provided for reference; refer to Table 4.13-4, *Noise Levels Along Roadways (dBA CNEL)*.

[17] City of Gardena, *Gardena General Plan 2006*, Circulation Element.
[18] City of Gardena, *Gardena General Plan 2006 Final Environmental Impact Report*, SCH# 2005021125, April 2006.

The noise level at 50 feet is representative of approximate distances to existing homes along the subject roadway. The noise contours were calculated for the following scenarios and conditions:

- Existing Condition: This scenario refers to the existing traffic noise condition and
- Existing Plus Project Condition: This scenario refers to the existing plus project traffic noise condition.

Table 4.13-4
Noise Levels Along Roadways (dBA CNEL)

Roadway	Segment	CNEL at 50 feet (dBA)	Distance to Contour			
			70 dBA CNEL	65 dBA CNEL	60 dBA CNEL	50 dBA CNEL
Existing Without Project Exterior Noise Levels						
Vermont Avenue	Rosecrans to 135th Street	69.7	48	102	221	476
Existing Plus Project Exterior Noise Levels						
Vermont Avenue	Rosecrans to 135th Street	69.8	48	104	224	483

As indicated in Table 4.13-4, the increase in traffic noise for the Existing Plus Project condition would have a nominal increase of 0.1 dBA (from 69.7 dBA to 69.8 dBA) at 50 feet from the centerline of Vermont Avenue, which would not be perceptible. Thus, no impact would occur in this regard.

Given that the Project would comply with all noise requirements, Project construction and operation would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the General Plan, Noise Ordinance, or applicable standards of other agencies and impacts would be less than significant.

COA N-1: Prior to approval of grading plans and/or prior to issuance of demolition, grading, and building permits, the following noise reduction techniques shall be included in the construction plans or specifications:

- Construction contracts specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state required noise attenuation devices.
- The Project Applicant shall demonstrate to the satisfaction of the City's Building Official that construction noise reduction methods shall be used where feasible, including shutting off idling equipment.
- During construction, equipment staging areas shall be located such that the greatest distance is between the staging area noise sources and noise-sensitive receptors.
- Per Gardena Municipal Code Section 8.36.080, construction activities shall not occur during the hours of 6:00 p.m. and 7:00 a.m. on weekdays; between the hours of 6:00 p.m. and 9:00 a.m. on Saturday; or any time on Sunday or a Federal holiday.

COA N-2: Prior to building permit issuance, the Project applicant would be required to demonstrate to the City of Gardena Building Division that the HVAC units proposed to be installed on-site would be within a noise level ranging between 62 to 77 dBA in order to comply with the City's Noise Ordinance (Gardena Municipal Code Chapter 8.36). Building permit issuance is contingent upon satisfactory demonstration that the HVAC units would comply with the City's Noise Ordinance.

COA N-3: An acoustical analysis would be required prior to the issuance of building permits for the Project to demonstrate compliance with City's Noise Ordinance (Gardena Municipal Code Chapter 8.36 and specifically Section 8.36.050, Interior noise standards). The interior noise study is required to be submitted to the building division for review and approval in conjunction with building permit application review; building permit issuance is contingent upon satisfactory demonstration that interior noise levels would comply with the City's noise ordinance.

Mitigation Measures: No mitigation measures are required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Construction activities can produce vibration that may be felt by adjacent land uses. The Caltrans Transportation and Construction Induced Vibration Guidance Manual provides general thresholds and guidelines as to the vibration damage potential from vibration impacts. Table 4.13-5, *Guideline Vibration Damage Potential Threshold Criteria*, identifies the thresholds and Table 4.13-6, *Vibration Source Levels for Construction Equipment*, identifies the approximate vibration levels for particular construction activities at a distance of 25 feet.

Table 4.13-5
Guideline Vibration Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some older buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
Source: Caltrans, *Transportation and Construction Vibration Guidance Manual*, Table 19, September 2013.		
Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.		

Table 4.13-6
Vibration Source Levels for Construction Equipment

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level LV (dVB) at 25 feet
Pile driver (impact	1.518 (upper range)	112
	0.644 (typical)	104
Pile driver (sonic)	0.734 (upper range)	105
	0.170 (typical)	93
Clam shovel drop (slurry wall)	0.202	94
Hydromill	0.008 (in soil)	66
Slurry wall	0.017 (in rock)	75
Vibratory roller	0.21	94
Hoe ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.		

Residential structures are located to the north, south, and west of the Project site, with the closest structures located to the south. The construction of the proposed Project would not require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. The primary vibration source during construction may be from a bull dozer. A large bull dozer has a vibration impact of 0.089 inches per second peak particle velocity (PPV) at 25 feet which is below the 0.30 FTA threshold. 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 structures. Potential vibration impacts would be less than significant, and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

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?

No Impact. The Project site in not located within an airport land use plan, nor is the Project site located within two miles of a private airstrip, public airport or public use airport. Thus, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area.

Mitigation Measures: No mitigation measures are required.

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4.14 Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

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)?

Less Than Significant Impact. The Project would not induce substantial unplanned population growth directly through new businesses or indirectly through the extension of roads or other infrastructure. The Project site is currently developed and surrounded by existing development. The Project proposes construction of a residential development and does not propose any employment-generating uses or new roadways.

As of January 2020, the City of Gardena had a population of 60,937 persons.[19] The Project involves the development of 84 townhome units, which would induce direct population growth in the City. Based on 2.83 persons per household, the Project's forecast population growth is approximately 238 persons.[20] The Project's forecast population growth would increase the City's existing population by less than one percent (approximately 0.40 percent) to 61,175 persons. The Gardena General Plan anticipates a population of 63,799 persons at buildout. Thus, the Project would be within the population projections anticipated and planned for by the City's General Plan and would not induce substantial unplanned population growth in the area.

Mitigation Measures: No mitigation measures are required.

[19] State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State – January 1, 2011-2020*, Sacramento, California, May 2020.
[20] January 2020 persons per household per the State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State – January 1, 2011-2020*, Sacramento, California, May 2020.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project site is currently developed with a retail garden center and commercial container nursery and a motel. There is no housing within the Project site. Thus, the proposed Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Mitigation Measures: No mitigation measures are required.

4.15 Public Services

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically 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:				
1) Fire protection?			X	
2) Police protection?			X	
3) Schools?			X	
4) Parks?			X	
5) Other public facilities?			X	

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically 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:

1) Fire protection?

Less Than Significant Impact. The City contracts with the Los Angeles County Fire Department (LACFD) to provide fire protection and emergency medical services to the City. There are two fire stations located within the City: Fire Station 158 located at 1650 W. 162nd Street and Fire Station 159 located at 2030 W. 135th Street. The closest fire station to the Project site is Fire Station 159, located approximately 1.4 miles west of the site.

The introduction of residential uses to the Project site would incrementally increase the demand for fire protection and emergency medical services to the site. However, as discussed in Section 4.14(a), the forecast population growth associated with the Project represents a less than one percent increase in population over existing conditions and is within the growth projections anticipated by the City's General Plan. Therefore, the population increase associated with the Project would not significantly impact fire protection services resulting in the need for new or physically altered facilities. Additionally, in accordance with Gardena Municipal Code Chapter 15.48, *Construction and Development Fees*, the Project Applicant

would be required to pay a fee per residential unit to the City. The proceeds from the fees shall be paid to a special fund of the City to be applied to the costs incurred by the City associated with the increased demand and use of multi-unit residential facilities on open space, drainage, and other public facilities and services.

As part of the development review process, the LACFD Fire Prevention Division has reviewed the proposed Project site plan and determined that access and water system requirements, which would enhance the proposed development's fire protection, are adequate. On April 15, 2020, LACFD Fire Prevention Division granted clearance of the Project's TTM. Further, the Project would be required to comply with standard LACFD conditions of approval. Specifically, LACFD addresses fire and life safety requirements for project construction at the fire plan check stage. This includes plan review of the design details of the architectural, structural, mechanical, plumbing, and electrical systems. The Project would be required to comply with applicable City, County, and State code and ordinance requirements for fire protection. The City of Gardena Municipal Code Chapter 8.08, *Fire Code*, adopts the Los Angeles County Fire Code by reference. Implementation of all Fire Code requirements would further reduce potential impacts concerning fire protection services. The Project would not require the need for new or physically altered fire station facilities in order to maintain acceptable service ratios, response times or other performance objectives and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

2) Police protection?

Less Than Significant Impact. The City of Gardena Police Department provides police protection services to the City, including the Project site. The Gardena Police Department is located at 1718 West 162nd Street, approximately 3.0 miles southwest of the Project site.

The introduction of residential uses to the Project site would incrementally increase the demand for police protection services to the site. However, as discussed in Section 4.14(a), the forecast population growth associated with the Project represents a less than one percent increase in population over existing conditions and is within the growth projections anticipated by the City's General Plan. Therefore, the population increase associated with the Project would not significantly impact police protection services resulting in the need for new or physically altered facilities. Further, as discussed above, in accordance with Gardena Municipal Code Chapter 15.48, *Construction and Development Fees*, the Project Applicant would be required to pay a fee per residential unit to the City. The proceeds from the fees shall be paid to a special fund of the City to be applied to the costs incurred by the City associated with the increased demand and use of multi-unit residential facilities on open space, drainage, and other public facilities and services.

Gardena Police Department has reviewed the Project site plan and recommends cameras be provided at entry and exit points and within parking areas. Other safety recommendations include the provision of good lighting around the exterior of the buildings and parking areas and ensuring landscaping does not cause blind spots. The Applicant would be required to comply with any specific conditions related to safety and security specified by the Gardena Police Department as a condition of approval. As discussed in Section 4.1(d), the Project would be required to submit a complete security and lighting plan in accordance with Gardena Municipal Code Section 18.42.150, *Security and Lighting Plan*. The purpose of the security and lighting plan is to ensure that safety and security issues are addressed in the design of developments. The Project would not require the need for new or physically altered police facilities in order to maintain

acceptable service ratios, response times or other performance objectives and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

3) Schools?

Less Than Significant Impact. The City is located within the Los Angeles Unified School District – Local South District (LAUSD) boundaries. The Project site is located within the service area of the following schools[21]:

- Gardena Senior High (9-12);
- Robert E. Peary Middle (6-8); and
- 135th Street Elementary (K-6).

In addition to the above, LAUSD identifies additional options including Purche Elementary (K-5), Avalon Gardens Elementary (K-6), and Animo Legacy Charter Middle (6-8) Schools.

Based on LAUSD student generation factors, the Project's 84 townhome units is forecast to generate 37 new students (19 elementary, 5 middle, 11 high school, and 2 special day class students) to the LAUSD.[22] The student population growth associated with the Project would incrementally increase the demand on schools serving the Project site. The 2020 Developer Fee Justification Study for Los Angeles Unified School District anticipates continued residential development within the school district service area and identifies available district capacity at all grade levels; however, it is anticipated that additional space at the middle school (7-8) grade level would be needed in the future.[23] The Project would not create a direct need for new or physically altered school facilities.

The Project would be subject to payment of school impact fees in accordance with Senate Bill 50 (SB 50). Pursuant to Government Code Section 65995(3)(h), payment of statutory fees is deemed to be full and complete mitigation of impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property…" Developer fees collected by LAUSD pursuant to SB 50 are used for the provision of additional and reconstructed or modernized school facilities. The Project Applicant would be required to pay all statutory fees in place at the time and demonstrate proof of payment to the City as a Condition of Approval. With payment of the fees, Project impacts to schools would be less than significant.

Mitigation Measures: No mitigation measures are required.

[21] Los Angeles Unified School District, Resident School Identifier, http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed June 24, 2020.
[22] Schoolworks, Inc., *2020 Developer Fee Justification Study Los Angeles School District*, March 2020.
[23] Ibid.

4) Parks?

Less Than Significant Impact. The proposed Project is forecast to generate approximately 238 residents, which could increase the use of parks within the Project area. However, as discussed in Section 4.14(a), the forecast population growth associated with the Project represents a less than one percent increase in population over existing conditions and is within the growth projections anticipated by the City's General Plan.

Based on the City's requirement of 3.0 acres of park area per 1,000 persons, the Project would result in the need for 0.7-acre of usable park area. The Gardena General Plan Gardena Municipal Code Chapter 17.20, *Park and Recreation Dedication and Fees*, requires either the dedication of land, the payment of fees, or a combination of both for park or recreational purposes. As a Condition of Approval, the Project Applicant would be required to pay the fee of $10,000 per unit in accordance with Gardena Municipal Code Chapter 17.20. Payment of the fees would reduce impacts to park facilities to less than significant.

Gardena Municipal Code Section 18.18.020, *Property development standards*, requires a minimum of 300 square feet of usable common or private open space be provided for each unit. The Project proposes 84 units, resulting in the requirement to provide 25,200 square feet of usable common or private open space. The Project proposes approximately 50,706 square feet of common open space areas within the site. A central recreational area is proposed within the center of the site and would include a swimming pool, sun deck, restroom facility, BBQ bar with trellis and sitting area, which will be contained in a fenced enclosure. Pool equipment will be enclosed within the restroom building. Adjoining the pool facilities will be a tot play structure, lawn area and covered BBQ area with tables; refer to Response to 4.16(b) for further discussion. With the provision of on-site amenities and compliance with Gardena Municipal Code Chapter 17.20, the Project would not result in the need for new or physically altered public park or recreation facilities and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

5) Other public facilities?

Less Than Significant Impact. Los Angeles County provides library, cultural resource centers and bookmobile services to over 3.4 million residents living in unincorporated areas and to residents in 49 of the 88 incorporated cities of Los Angeles County. LA County Library has a 7.5 million volume book collection and also provides magazines, newspapers, government publications and specialized materials including online databases. There is one library located within the City of Gardena: Gardena Mayme Dear Library. The Masao W. Satow Library (currently closed for refurbishment) is located just outside of the City's jurisdictional boundaries, within unincorporated Los Angeles County. The forecast population growth associated with the Project would incrementally increase the demand for library services. As part of its Strategic Plan, the County of Los Angeles will support the library system by identifying funding opportunities to extend programs and services at all County libraries. Although the Project would increase demand for library services, it would not result in the need for new or physically altered library facilities to adequately serve the community. Impacts to library services would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.16 Recreation

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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?			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	

a) 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?

Less Than Significant Impact. Refer to Response to 4.15(a)(4).

Mitigation Measures: Less Than Significant Impact.

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?

Less Than Significant Impact. Gardena Municipal Code Section 18.18.020, *Property development standards*, requires a minimum of 300 square feet of usable common or private open space be provided for each unit. The Project proposes 84 units, resulting in the requirement to provide 25,200 square feet of usable common or private open space. As part of the proposed residential development, approximately 56,256 square feet of open space would be provided, comprised of 5,550 square feet within private balconies and 50,706 square feet within common open space areas. A central recreational area is proposed within the center of the site and would include a swimming pool, sun deck, restroom facility, BBQ bar with trellis and sitting area, which will be contained in a fenced enclosure. Pool equipment will be enclosed within the restroom building. Adjoining the pool facilities will be a tot play structure, lawn area and covered BBQ area with tables.

Gardena Municipal Code Chapter 17.20, *Park and Recreation Dedication Fees*, requires either the dedication of land, the payment of fees, or a combination of both for park or recreational purposes. As stated, as a Condition of Approval, the Project Applicant would be required to pay the fee of $10,000 per unit in accordance with Gardena Municipal Code Chapter 17.20. With the provision of on-site amenities and compliance with Gardena Municipal Code Chapter 17.20, the Project would not require the construction of new or expansion of existing recreational facilities and impacts would be less than significant.

The potential environmental effects associated with construction and operation of the Project, including the proposed private balconies and on-site recreation area are analyzed within this Initial Study and impacts have been determined to be less than significant with compliance with regulatory requirements and implementation of mitigation measures. The proposed Project would not include recreational facilities or require the construction or expansion of recreational facilities that would have a significant adverse physical effect on the environment. The HOA would be required to maintain the proposed recreational area, as well the approximately 10,758 square feet of additional landscaped areas proposed throughout the site. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.17 Transportation

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b. Would the project conflict or be inconsistent with CEQA Guidelines section 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 (e.g., farm equipment)?				X
d. Result in inadequate emergency access?			X	

This section is based on the *Evergreen Row Townhomes Local Transportation Assessment* (Local Transportation Assessment), prepared by Kittelson & Associates, dated June 30, 2020 and included in its entirety as Appendix I, Local Transportation Assessment.

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact.

Transit Facilities

The Project site and surrounding area is served by GTrans and LA Metro.

GTrans provides public transportation services in the South Bay, including the cities of Gardena, Hawthorne, Compton, Carson, Harbor City, Lawndale and Los Angeles. Within the Project area, GTrans Line 2 operates on a loop circling Western, Imperial Highway, Vermont, Normandie and Pacific Coast Highway. The closest stop to the Project site is located on the east side of Vermont Avenue just north of 135th Street, approximately 600 feet from the Project site. Line 2 typically operates on weekdays from approximately 4:40 AM to 10:00 PM with 15- to 30-minute headways (the time between bus arrivals). On weekends, Line 2 operates from approximately 5:00 AM to 9:30 PM with 15- to 40-minute headways.

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

The Project would continue to be served by the existing transit system. The population growth associated with the Project could incrementally increase the demand for public transit services. However, the Project would not conflict with a program plan, ordinance, or policy addressing transit and impacts would be less than significant.

Roadway Facilities

Vermont Avenue provides access to the Project site. According to the Gardena General Plan, Vermont Avenue is an arterial. An arterial roadway connects traffic from smaller roadways to freeway interchanges and reginal roadway corridors. They serve as the principal urban thoroughfares, provide a linkage between activity centers in the City to adjacent communities and other parts of the region, and provide intra-city mobility. The Project does not propose any changes to Vermont Avenue. Vermont Avenue provides three lanes of travel in each direction with a center landscaped median and curbside parking.

The Project does not propose any modifications to Vermont Avenue. The Project would involve removal of four existing driveways and construction of one primary driveway at the southeast portion of the Project site as well as remove and replace all curb, gutter, and sidewalk fronting the Project site. The proposed driveway would be gated with a visitor kiosk and provide right-in, right-out access only.

Bicycle Facilities

There are no bicycle facilities adjacent to the Project site. A Class II Bicycle Lane is located on the eastern side of Vermont Avenue. The City adopted the South Bay Bicycle Master Plan (Bicycle Master Plan), which is a multi-jurisdictional bicycle master plan intended to guide the development and maintenance of a comprehensive bicycle network and set of programs throughout the cities in the South Bay, including Gardena. The Bicycle Master Plan (Figure 4-3) identifies proposed bicycle facilities within Gardena. A Class II Bike Lane is proposed along Vermont Avenue, adjacent to the Project site. A Class II Bike Lane would provide a striped lane for one-way bike travel. The Project does not propose any modifications to Vermont Avenue. The Project would involve removal of the four existing driveways and construction of one primary driveway at the southeast portion of the Project site, as well as removing and replacing the sidewalk fronting the Project site. These improvements would not interfere or conflict with the proposed Class II Bike Lane along the Project frontage. Consolidation of driveways from four to one would improve the conditions for a future Class II Bike Lane adjacent to the Project site. Residents of the proposed Project could incrementally increase the use of bicycle facilities within the Project area and throughout the City. The Project would not conflict with a program plan, ordinance, or policy addressing bicycle facilities and impacts would be less than significant.

Pedestrian Facilities

A sidewalk is currently provided along Vermont Avenue, adjacent to the Project site. As discussed above, the Project would involve removal of the four existing driveways and construction of one primary driveway at the southeast portion of the Project site as well as removing and replacing the sidewalk fronting the Project site. Consolidation of driveways from four to one and construction of a new sidewalk will reduce the interruptions and improve the pedestrian experience along the Project frontage. The Project would also provide parkway landscaping and trees along the Project frontage. A pedestrian path is also proposed to extend from the sidewalk into the Project site, adjacent to the new driveway. The Project would not conflict with a program, plan, ordinance or policy addressing pedestrian facilities and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The City's *SB 743 Implementation Transportation Analysis Updates (*Transportation Analysis Guidelines), includes criteria for individual project screening, which can be used to screen projects that are expected to generate low vehicles miles traveled (VMT) out of a detailed VMT analysis. The City's three VMT screening criteria and determinations include:

- Project Type Screening: Projects that generate less than 110 daily trips may be screened from conducting a VMT analysis. This screening criterion does not apply since the Project is expected to generate more than 110 daily trips. As shown in Table 1 of the Local Transportation Assessment, the Project is expected to generate 457 daily trips.

- Low VMT Area Screening: According to Figure 1 in the City's Transportation Analysis Guidelines, the Project site is located in an area with a daily residential home-based VMT per capita that is less than 85% of the regional average. Based on this criterion, the Project would be screened out of requiring a detailed VMT analysis.

- Transit Proximity Screening: Projects located within a High-Quality Transit Area (HQTA) would be screened from a detailed VMT analysis if the project does not have certain characteristics including providing more parking than what is required by the City. Although the Project is located in a HQTA, this screening criterion does not apply to the Project, as the City's parking requirement for the proposed Project is 207 spaces, and the Project proposes 208 spaces.

To be screened out of a detailed VMT analysis, a project would need to satisfy at least one of the VMT screening criteria identified above. Given that the proposed Project is located within a low VMT area, the Project meets the Low VMT Area Screening and a detailed VMT analysis would not be required. Residential projects located within a low VMT generating area are presumed to have a less than significant impact. Thus, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Mitigation Measures: No mitigation measures are required.

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

No Impact. The Project would not provide any off-site roadway improvements that could substantially increase hazards due to a design feature. The Project would involve removal of existing driveways and construction of one primary driveway at the southeast portion of the Project site. The proposed driveway would be gated with a visitor kiosk and would provide right-in, right-out access only. Proposed improvements, including the access driveway and sight distance standards, would be reviewed and approved by the City of Gardena. Thus, no impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

d) Result in inadequate emergency access?

Less Than Significant Impact. Vermont Avenue provides direct access to the Project site and would serve as a primary evacuation and emergency access route within the area. The construction and operation of the proposed Project would not place any permanent physical barriers on Vermont Avenue. There is the potential that traffic lanes located immediately adjacent to the Project site may be temporarily closed or controlled by construction personnel during construction activities. Any temporary closure would be required to receive permission from the traffic authority in accordance with Gardena Municipal Code Section 13.56.430, *Road Closure or Interference with Highway Use*. However, this would be temporary and emergency access to the Project site and surrounding area would be required to be maintained along Vermont Avenue at all times. Additionally, all construction staging would occur within the boundaries of the Project site and would not interfere with circulation along Vermont Avenue, or any other nearby roadways.

The Project does not propose any modifications to Vermont Avenue. The Project would involve removal of existing driveways and construction of one primary driveway at the southeast portion of the Project site as well as remove and replace all curb, gutter, and sidewalk fronting the Project site. The proposed driveway would be gated with a visitor kiosk. Prior to the issuance of a building permit, the applicant is required to submit appropriate plans for plan review to ensure compliance with zoning, building, and fire codes. The Los Angeles County Fire Department (LACFD) has reviewed the Project for access requirements, minimum roadway widths, fire apparatus access roads, fire lanes, signage, access devices and gates, access walkways, among other requirements to ensure adequate emergency access would be provided to and within the Project site. Thus, Project construction and operation would not result in inadequate emergency access. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.18 Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 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:				
1) 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 section 5020.1(k), or		X		
2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 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:

1) 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 section 5020.1(k)?

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

Less Than Significant Impact with Mitigation Incorporated. Assembly Bill (AB) 52 requires that lead agencies evaluate a project's potential impact on "tribal cultural resources", which include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources". AB52 also gives lead agencies the discretion to determine, based on substantial evidence, whether a resource qualifies as a "tribal cultural resource." AB 52 applies whenever a lead agency adopts an environmental impact report, mitigated negative declaration, or negative declaration.

Senate Bill (SB) 18 requires that lead agencies, "prior to the adoption or amendment of a city or county's general plan, conduct consultations with California Native American tribes for the purpose of preserving specified places, features, and objects that are located within the city or county's jurisdiction. The bill would define the term "consultation" for purposes of those provisions. By imposing new duties on local governments with respect to consultations regarding the protection and preservation of California Native American historical, cultural, and sacred sites, the bill would impose a state-mandated local program." As the Project requests a General Plan Amendment, in compliance with SB 18, the City provided formal notification to California Native American tribal representatives identified by the California Native American Heritage Commission (NAHC); refer to Appendix C. 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 Public Resources Code Section 21074.

In compliance with both AB 52 and SB 18, the City provided formal notification to those California Native American Tribal representatives requesting notification in accordance with AB 52 and those on the NAHC's list for Tribal Consultation under SB 18; refer to Appendix C. The Gabrielino Tongva Tribe and the Gabrieleno Band of Mission Indians – Kizh Nation, requested formal consultation with the City. In response to the request for consultation, the City engaged with the Gabrielino Tongva Tribe and the Gabrieleno Band of Mission Indians – Kizh Nation which included telephone and email correspondence. Although no Native American tribal cultural resources are known to occur within the Project site, the parties agreed to impose mitigation measures to mitigate potential impacts to previously unidentified Native American tribal cultural resources. Although agreement was reached as to the requirement for a Native American Monitor to be on-site during Project ground disturbing activities in order to mitigate potential impacts to tribal cultural resources, the Tribal representatives do not agree as to which Tribe should be the rightful monitor. As the Lead Agency, the City has determined that acting in good faith and after reasonable effort, mutual agreement cannot be reached between the Tribes regarding the rightful monitor. Mitigation Measure TCR-1 requires the Project Applicant to retain and compensate for the services of a Tribal Monitor/consultant who is ancestrally affiliated with the Project area and listed under the NAHC's Tribal Contact list for the area of the Project location. Consultation pursuant to AB 52 and SB 18 (discussed below) has been concluded.

As discussed in Response 4.5(b), no prehistoric or historic archaeological resources were identified within the Project area. In addition, the records searches conducted in support of the Project indicate that no archaeological or tribal resources have been previously recorded within the Project area and the potential for prehistoric or historic resource deposits is considered to be low. However, there is the potential for the Project to affect previously unidentified Native American tribal cultural resources. Mitigation Measure TCR-1 would ensure a qualified Tribal Monitor/consultant is present during site disturbance activities having the potential to uncover tribal cultural resources. If evidence of potential subsurface tribal cultural resources is found during ground disturbing activities, Mitigation Measure TCR-2 would ensure the

activities in the vicinity of the find are halted, appropriate parties are notified, and evaluation and treatment of resources occurs. With implementation of Mitigation Measures TCR-1 and TCR-2, potential impacts to tribal cultural resources would be less than significant.

Mitigation Measures:

TCR-1: Prior to grading permit issuance, the Project Applicant shall retain and compensate for the services of a Tribal Monitor/consultant who is ancestrally affiliated with the Project area and listed under the NAHC's Tribal Contact list for the area of the Project location. A copy of the executed contract shall be submitted to the City of Gardena Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal Monitor/consultant will only be present on-site during the construction phases that involve the following ground-disturbing activities: grading, excavation, 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 Tribal Monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources, whichever occurs first.

TCR-2: Upon discovery of any Tribal Cultural Resources or archaeological resources, construction activities shall cease in the find's immediate vicinity and construction activities shall be diverted away from the find (50-foot buffer around the find) until the find can be assessed. All Tribal Cultural Resources and archaeological resources unearthed by ground-disturbing activities shall be evaluated by the Tribal Monitor and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983). If the resources are Native American in origin, the Tribal Monitor shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribal Monitor requests reburial or preservation for educational purposes. Work may continue elsewhere on the Project site while evaluation and, if necessary, mitigation takes place (State CEQA Guidelines §15064.5 [f]). If the archaeologist determines that the resource constitutes a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures or appropriate mitigation shall be made available. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines §15064.5(f) for historical resources and 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 infeasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. 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 a local school or local historical society for educational purposes.

In the event that human remains are discovered during on-site construction activities, the Tribal Monitor and/or qualified archaeologist shall immediately divert work at minimum of 50 feet and place an exclusion zone around the discovery location. The Tribal Monitor shall then notify the

Tribe, the qualified lead archaeologist, and the construction manager who shall notify the County Coroner per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Work shall continue to be diverted while the coroner determines whether the remains are human and subsequently Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the Native American Heritage Commission (NAHC) as mandated by State law who shall then appoint a Most Likely Descendent (MLD). Once NAHC identifies the most likely descendants, the descendants shall make recommendations regarding proper burial, which shall be implemented to the extent feasible in accordance with Section 15064.5(e) of the State CEQA Guidelines.

4.19 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			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's 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	

This section is based in part on the *Sanitary Sewer Analysis Evergreen – Melia Homes APN Nos. 6115-019-042, 6115-019-043, 6115-019-044, & 6115-019-045 13615, 13619, & 13633 S. Vermont Avenue, Gardena, CA 90247* (Sewer Study) prepared by C&V Consulting, Inc., Prepared April 2020, Revised May 2020 and June 2020 and included in its entirety as Appendix J, Sanitary Sewer Analysis.

a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

WATER

The Project site is currently served by the Golden State Water Company (GSWC). The Project proposes to install 8-inch water lines within the private drives with two connections to an existing 12-inch water main within Vermont Avenue. The potential environmental effects associated with construction and operation of the Project, including the proposed water lines to serve the residential development are analyzed within this Initial Study and impacts have been determined to be less than significant with compliance with regulatory requirements and implementation of mitigation measures. Thus, the proposed Project would not require or result in relocation or construction of water facilities, the construction or relocation of which could cause significant environmental effects.

Refer to Response 4.19(b) regarding water supply.

WASTEWATER AND WASTEWATER TREATMENT

The Project proposes to install 8-inch sewer lines within the private drives that would connect to a proposed 8-inch sewer line within a proposed private easement located between two properties west of the site in order to connect to the existing 8-inch sewer line in Berendo Avenue. The potential environmental effects associated with construction and operation of the Project, including the proposed sewer lines to serve the residential development are analyzed within this Initial Study and impacts have been determined to be less than significant with compliance with regulatory requirements and implementation of mitigation measures. Thus, the proposed Project would not require or result in relocation or construction of wastewater facilities, the construction or relocation of which could cause significant environmental effects.

Refer to Response 4.19(c) below, regarding wastewater treatment.

STORMWATER DRAINAGE

The Project site would be graded to allow for a single low point on the site equipped with a curb inlet catch basin. The catch basin is proposed to be located at the end of the drive aisle at the southwestern property line and would be connected to a proposed drywell system for treatment and infiltration. Two additional curb inlet catch basins would be located on-site in a flow-by condition to reduce the amount of stormwater flowing into the sump location. The storm drain system would also have a detention system to capture excess flows generated by the proposed Project conditions. No off-site drainage improvements are proposed. The potential environmental effects associated with construction and operation of the Project, including the proposed storm drain improvements to serve the residential development are analyzed within this Initial Study and impacts have been determined to be less than significant with compliance with regulatory requirements and implementation of mitigation measures. Thus, the proposed Project would not require or result in relocation or construction of stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects.

Refer to Section 4.10 regarding drainage patterns and the Project's proposed hydrology and drainage.

ELECTRICITY, NATURAL GAS, AND TELECOMMUNICATIONS

The Project site receives electrical power from Southern California Edison (SCE) and natural gas service from Southern California Gas (SoCalGas). Telecommunication services are provided by a variety of companies and are typically selected by the individual customer. Transmission lines/infrastructure for these services are provided within the Project area and currently serve on-site uses.

The Project's anticipated electricity demand would be approximately 356 MWh per year. The Project's anticipated natural gas demand would be approximately 9,601 therms per year; refer to Section 4.6 regarding an analysis of the Project's energy use. The Project would connect to existing electrical, natural gas, and telecommunications infrastructure, and no off-site improvements are proposed. The potential environmental effects associated with the Project's energy demand are analyzed within this Initial Study and impacts have been determined to be less than significant. The proposed Project would not require or result in relocation or construction of electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Mitigation Measures: No mitigation measures are required.

b) 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. Golden State Water Company (GSWC) supplies water to the Project site. GSWC's 2015 Urban Water Management Plan - Southwest (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 Project proposes a General Plan Amendment (GPA) to change the General Plan land use designation from General Commercial to High Density Residential. As discussed in Section 4.14, the Project involves the development of 84 townhome units, which would induce direct population growth in the City. Based on 2.83 persons per household, the Project's forecast population growth is approximately 238 persons. The Project's forecast population growth would increase the City's existing population by less than one percent (approximately 0.40 percent) to 61,175 persons.[24] The Gardena General Plan anticipates a population of 63,799 persons at buildout. Thus, the Project would be within the population projections anticipated and planned for by the City's General Plan and would not increase growth beyond what was anticipated in the UWMP.

In 2015, GSWC's Southwest Area had a daily per capita water use of 87 gallons per capita per day (GPCD), which was below the 2015 water use target of 124 GPCD. As discussed in Response 4.10(e), the Project's water demand would total approximately 122 GPCD or 32.6 acre-feet per year (AFY). Although slightly greater than the 2020 interim target of 121 GPCD, this does not take into account the water demand/use associated with the current on-site land uses (retail garden center and commercial container nursery and motel) which would be removed as part of the Project. Project impacts concerning water demand would be less than significant. Further, GSWC provides conservation programs along with incentives to conserve water in the City. Although the GSWC service area population is expected to increase, according to the

[24] Ibid.

UWMP, the overall baseline potable demand in acre-feet per year (AFY) is expected to decrease due to further water use efficiency and recycled water programs.

Mitigation Measures: Less Than Significant Impact.

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's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact.

WASTEWATER GENERATION

The proposed Project would be serviced by an existing 8-inch vitrified clay pipe (VCP) sewer main flowing in the southerly direction within the street centerline of South Budlong Avenue. The Project proposes to connect to an existing sewer lateral within the existing single-family residential tract directly west of the Project site which connects to the existing 8-inch VCP sewer main within South Budlong Avenue, approximately 690 feet southwest of the Project site. Based on direction from City staff, one manhole (referred to herein as Manhole #1) along the 8-inch VCP sewer main was selected for monitoring. The manhole is located approximately 1,700 feet southwest of the Project site and is downstream of the point where proposed Project site flows would be contributed.

The existing sewer maximum flows were determined via monitoring of Manhole #1 for eight days. Over the duration of monitoring, flowrate, water level, and velocity measurements were taken every 15 minutes; the tabular and graphical results from the manhole monitoring are provided in Appendix B of the Sewer Study included in Appendix J. Based on the monitoring data collected by US3, existing maximum flow for Manhole #1 was measured at 190.55 gallons per minute (gpm) (274,392 gallons per day [gpd]). The maximum water level was measured at 4.11 inches. The next highest water level was measured at 3.61 inches.

Upon further investigation of the existing water levels observed, it was determined that the highest monitored water level was an outlier and not representative of the actual pipe hydraulics. This may have been the result of temporary, partial clogging which, when unclogged, created an influx in water level. Due to the inconsistency and possible anomaly within the monitoring results, two separate scenarios were analyzed for calculations: Scenario #1 was analyzed based on the existing maximum monitored flow and the highest measured water level (4.11 inches) and Scenario #2 was analyzed based on the existing maximum monitored flow and the second highest (after excluding the flow disruption) existing measured water level (3.61 inches).

The Project proposes to remove existing site improvements and develop the site with 84 townhomes. Maximum sewer flows that would be generated by the proposed Project were estimated using the Los Angeles County Sanitation District (LACSD) "Loadings for Each Class of Land Use" table. In addition to the proposed development, an in-progress 63-unit attached condominium development was determined to be tributary to the sanitary sewer segment that would convey wastewater flow from the Project site. The 63-unit development is not currently built-out/occupied; therefore, the existing sewer monitoring results did not account for the flows associated with the 63-unit development. In order to account for these flows, the flows calculated by the sewer study prepared for the 63-unit development were used. Thus,

the proposed flows tributary to Manhole #1 consist of the proposed Project (40,950 gpd) and the 63-unit development (30,713 gpd).

Under Scenario #1, total future maximum flow with the proposed Project and the 63-unit development would be 346,055 gpd with a water level of 4.75 inches. Under Scenario #2, total future maximum flow with the proposed Project and the 63-unit development would be 346,055 gpd with a water level of 4.13 inches. The maximum flows generated by the proposed Project and the 63-unit development would result in an approximately 14 to 16 percent increase in flows tributary to the existing 8-inch VCP sewer main within South Budlong Avenue. The water level in the pipe would increase by an amount between 0.52 to 0.64 inches. According to the Sewer Analysis, the increase in flows tributary to the existing 8-inch VCP sewer main within South Budlong Avenue would be negligible and upgrades to the sewer main would not be necessary to support the proposed Project. Thus, the future peak flow rates produced by the proposed Project would not significantly impact or exceed the capacity of the existing sewer infrastructure. Impacts would be less than significant.

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 treats approximately 260 mgd of wastewater.[25] According to the Sewer Analysis, the Project would have a maximum wastewater flow of 40,950 gpd requiring treatment at the Joint Water Pollution Control Plant.

The design capacities of LACSD's facilities are based on the regional growth forecast adopted by SCAG. Expansion of LACSD's facilities must be sized and their service phased in a manner that is consistent with the SCAG regional growth forecast. Because SCAG growth projections are based in part on growth identified in local General Plans, growth associated with development of the Project site based on its General Plan land use designation has been anticipated by the growth forecasts. Although the Project proposes a General Plan Amendment to change the Project site's land use designation from General Commercial to High Density Residential, as discussed in Section 4.14, the Project's forecast population growth would increase the City's existing population by less than one percent (approximately 0.40 percent) to 61,175 persons. The Gardena General Plan anticipates a population of 63,799 persons at buildout. Thus, the Project would be within the population projections anticipated and planned for by the City's General Plan. Further, LACSD has the authority 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. Thus, adequate wastewater treatment would be available to serve the proposed Project and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

[25] Los Angeles County Sanitation Districts, Facilities, Joint Water Pollution Control Plant, https://www.lacsd.org/facilities/?tab=2&number=1, accessed July 19, 2020.

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?

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Waste Resources of Gardena (WRG) is the authorized waste hauler for the City, providing construction debris and other building materials removal, as well as commercial, industrial, and residential refuse collection. Waste from Gardena is disposed of at a number of solid waste facilities, with the majority of waste disposed at the Chiquita Canyon Sanitary Landfill.

The Project proposes to remove all existing on-site structures and surface parking lot and develop a residential community consisting of attached townhomes. State law requires a 65 percent diversion rate for construction and demolition projects. Gardena Municipal Code Chapter 8.20, *Solid Waste and Recyclable Collection and Disposal*, addresses solid waste disposal, including requirements for construction and demolition projects. In accordance with Gardena Municipal Code Section 8.20.060, *Solid waste disposal and diversion*, each construction and demolition project for which a building and/or demolition permit is applied for and approved must achieve the waste diversion performance standard or show a good faith effort to achieve that standard. Compliance with the Gardena Municipal Code would achieve compliance with State law.

Project implementation would increase solid waste disposal demands over existing conditions. As stated, solid waste within the City is primarily disposed of at the Chiquita Canyon Sanitary Landfill located at located at 29201 Henry Mayo Drive, Castaic. In 2018, approximately 72 percent of solid waste from Gardena was disposed of at the Chiquita Canyon Sanitary Landfill; the Sunshine Canyon City/County Landfill and the El Sobrante Landfill received approximately 7.3 and 7.0 percent of solid waste from Gardena, respectively.[26] Chiquita Canyon Sanitary Landfill has a maximum permitted throughput of 12,000 tons per day. The facility's maximum capacity is 110,366,000 cubic yards and has a remaining capacity of 60,408,000 cubic yards.[27] It is anticipated that Chiquita Canyon Sanitary Landfill would continue to receive a majority of the solid waste from the City. Solid waste generated from the Project could be accommodated at the Chiquita Canyon Sanitary Landfill or a combination of the disposal facilities currently receive solid waste for disposal from the City.

The City has a per capita disposal rate target of 8.0 pounds per person per day. Since 2012, the City has met this target through its diversion programs with the most recent disposal rate (2018) of 7.5 pounds per person per day.[28] The City would continue to implement its diversion programs and require compliance with all federal, State and local statutes and regulations for solid waste, including those

[26] CalRecycle, Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed July 20, 2020.

[27] CalRecycle, SWIS Facility/Site Activity Details, Chiquita Canyon Sanitary Landfill (19-AA-0052), https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3574?siteID=1037, accessed July 20, 2020.

[28] CalRecycle, Jurisdiction Review Reports, https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/ReviewReports, accessed July 20, 2020.

identified under the most current CALGreen standards and in compliance with AB 939. Thus, the proposed Project would result in less than significant impacts concerning solid waste.

Mitigation Measures: No mitigation measures are required.

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4.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. According to the Cal Fire Hazard Severity Zone Map, the City of Gardena, including the Project site, is not located within a State Responsibility Area (SRA).[29] Further, the Project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) within a Local Responsibility Area (LRA).[30] The Project would be required to comply with all City and LACFD requirements for fire prevention and safety measures, including site access.

Vermont Avenue provides direct access to the Project site and would serve as a primary evacuation and emergency access route within the area. The construction and operation of the proposed Project would

[29] Cal Fire, Fire Hazard Severity Zone Maps, *Fire Hazard Severity Zones in SRA*, https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/, accessed June 24, 2020.
[30] Cal Fire, Fire Hazard Severity Zone Maps, *Very High Fire Hazard Severity Zones in LRA*, https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/, accessed June 24, 2020.

not place any permanent physical barriers on Vermont Avenue. There is the potential that the traffic lanes located immediately adjacent to the Project site may be temporarily closed or controlled by construction personnel during construction activities. Any temporary closure would be required to receive permission from the traffic authority in accordance with Gardena Municipal Code Section 13.56.430, *Road Closure or Interference with Highway Use*. However, this would be temporary and emergency access to the Project site and surrounding area would be required to be maintained along Vermont Avenue at all times. Additionally, all construction staging would occur within the boundaries of the Project site and would not interfere with circulation along Vermont Avenue, or any other nearby roadways. Thus, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

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?

No Impact. As discussed above, the Project site, is not located within a SRA and is not located within a VHFHSZ within a LRA. The Project site is relatively flat and does not contain any slopes or features that would exacerbate wildfire risks. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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?

No Impact. As discussed above, the Project site, is not located within a SRA and is not located within a VHFHSZ within a LRA. The Project site is located within an urbanized area, surrounding by existing development and associated infrastructure. The Project would not require the installation or maintenance of infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment.

Mitigation Measures: No mitigation measures are required.

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?

No Impact. As discussed above, the Project site, is not located within a SRA and is not located within a VHFHSZ within a LRA. Further, the Project site and surrounding area is relatively flat. The Project would not expose people or structures to significant risk associated with wildfires.

Mitigation Measures: No mitigation measures are required.

4.21 Mandatory Findings of Significance

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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?		X		
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		X		
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

a) 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 substantially degrade the quality of the environmental or result in significant environmental impacts that cannot be reduced to a less than significant level with compliance with the established regulatory framework and implementation of mitigation measures and standard conditions of approval.

As discussed in Section 4.4, Biological Resources, the Project would not substantially reduce the habitat of 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 substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed in Section 4.5, Cultural Resources, the Project would not eliminate important examples of the major periods of California history or prehistory. As also concluded in Section 4.5 and Section 4.18, Tribal Cultural Resources, the Project is not anticipated to result in impacts to known cultural or tribal cultural resources. However, in the unlikely event that buried archaeological resources are encountered during ground disturbance activities, Mitigation Measure TCR-2 would require all Project construction efforts to halt until a qualified archaeologist can evaluate the find. Mitigation Measure TCR-1 would ensure a Tribal Monitor is present during site disturbance activities having the potential to unearth tribal cultural resources and, if discovered, Mitigation Measure TCR-2 would ensure activities in the vicinity of the find are halted and appropriate evaluation and treatment of any potential resources occurs. The Project would not 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. Impacts would be less than significant with the implementation of mitigation.

Mitigation Measures: No additional mitigation measures are required.

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

Less Than Significant Impact with Mitigation Incorporated. Based on the analysis contained in this Initial Study, the proposed Project would not have cumulatively considerable impacts with implementation of Project mitigation measures. Implementation of standard conditions and mitigation measures at the Project-level would reduce the potential for the incremental effects of the proposed Project to be considerable when viewed in connection with the effects of past projects, current projects, or probable future projects.

Mitigation Measures: No additional mitigation measures are required.

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

Less Than Significant Impact with Mitigation Incorporated. Previous sections of this Initial Study reviewed the proposed Project's potential impacts to human beings related to several environmental topical areas. As determined throughout this Initial Study, the proposed Project would not result in any potentially significant impacts that cannot be mitigated or reduced with implementation of mitigation measures and/or standard conditions imposed by the City. The Project would not cause a substantial adverse effect on human beings, either directly or indirectly and impacts would be less than significant.

Mitigation Measures: No additional mitigation measures are required.

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C&V Consulting, Inc. (Hydrology, LID, Sewer)
6 Orchard, Suite 200
Lake Forest, California 92630

Stantec Consulting Services (Phase I Environmental Site Assessment)
735 E. Carnegie Drive, Suite 280
San Bernardino, California 92408

Albus-Keefe & Associates, Inc. (Geotechnical and Percolation Study)
1011 North Armando Street
Anaheim, California 92806

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