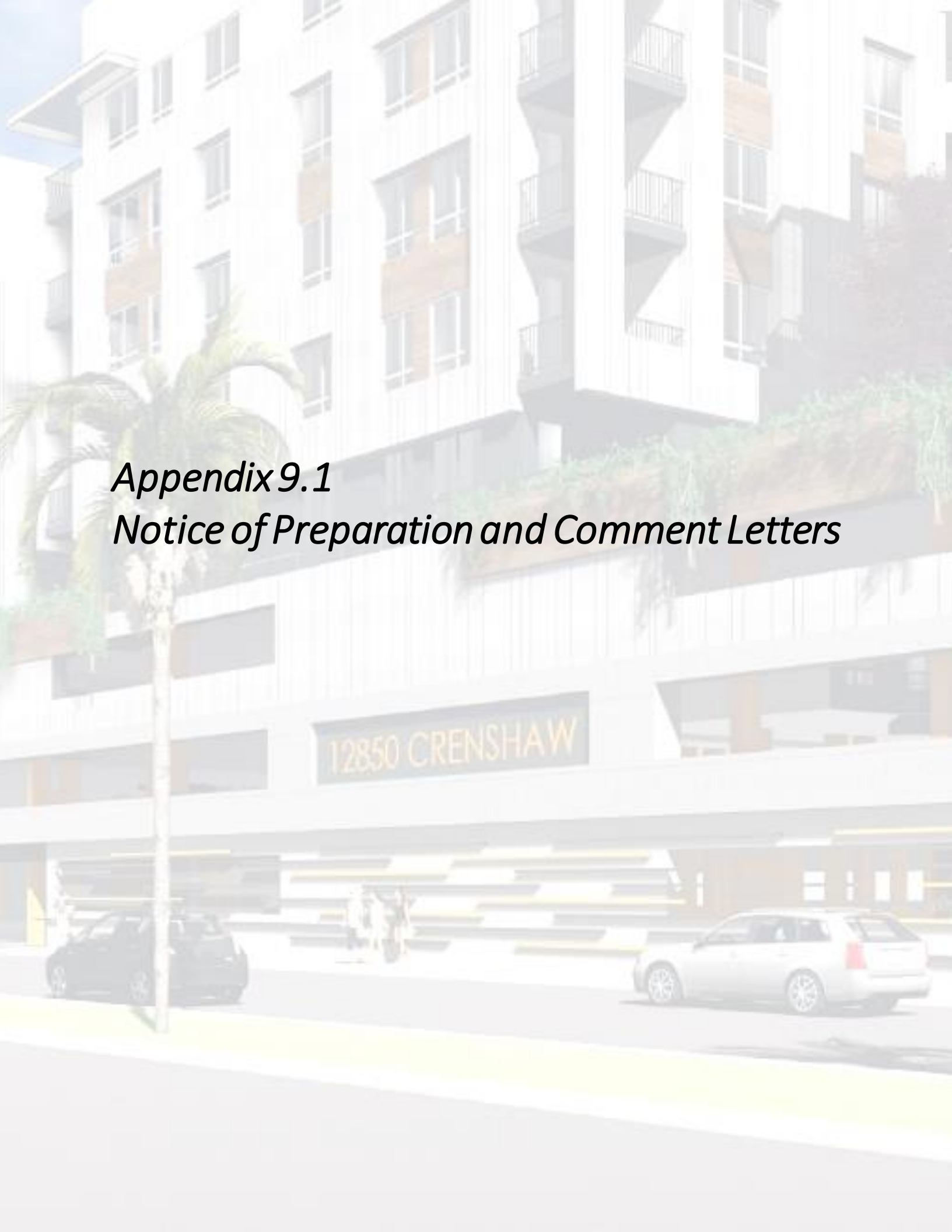


Appendix 9.1
Notice of Preparation and Comment Letters

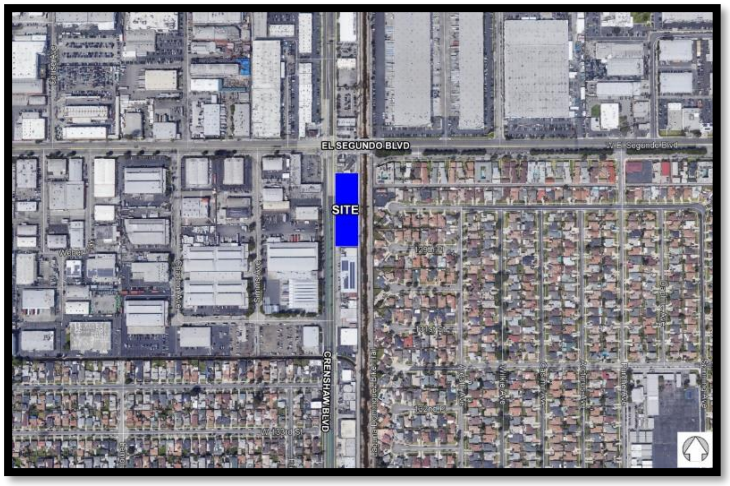
Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting

Project Name:	Gardena Transit-Oriented Development Specific Plan Project
Project Applicant:	Din/Cal 4, Inc.
Project Address:	12850 - 12900 Crenshaw Boulevard
Public Comment Period:	August 20, 2020 to September 18, 2020
Virtual Public Scoping Meeting:	September 2, 2020 from 7:00 PM to 9:00 PM

Pursuant to California Public Resources Code §21165 and State California Environmental Quality Act (CEQA) Guidelines §15050, the City of Gardena (City) is the Lead Agency for preparation of an Environmental Impact Report for the proposed Gardena Transit-Oriented Development Project ("Project"). In accordance with State CEQA Guidelines §15082, the City has prepared this Notice of Preparation (NOP) to provide responsible and trustee agencies, the Office of Planning and Research, and the County Clerk with sufficient information describing the Project and its potential environmental effects to enable the responsible agencies to make a meaningful response to this NOP.

An Initial Study (see attached) was conducted to determine if the proposed Project would have a significant effect on the environment. On the basis of this initial evaluation, the City has found that the proposed Project may have a significant effect on the environment and an EIR will be required. The City is requesting your agency's specific and detailed input regarding the scope and content of the environmental information related to your agency's statutory responsibility to be included in the Draft Environmental Impact Report (EIR). Pursuant to State CEQA Guidelines §15083, this NOP also serves to facilitate consultation with any persons or organizations that may be concerned with the Project's environmental effects. Additionally, this NOP serves as a notice for the Public Scoping Meeting, which is held to expedite and facilitate the consultation process.

Project Location - The Project site is located in the northwestern corner of the City of Gardena, in the County of Los Angeles. The Project site is comprised of four lots on one 1.33-acre parcel (APN # 4060-004-039) at 12850 - 12900 Crenshaw Boulevard, just south of West El Segundo Boulevard.



Project Summary - The Project proposes to develop up to 265 dwelling units (DUs) and adopt the Gardena Transit-Oriented Development Specific Plan Specific Plan ("GTODSP"). The GTODSP includes the statutorily required elements, including a land use plan, a circulation plan, a description of existing and proposed utilities and infrastructure, design guidelines, development standards, and administrative provisions, as summarized below.

The Project would replace an existing auto parts warehouse use (approximately 24,990 square feet (SF)) with an eight-story residential building with up to 265 DUs at a density of 199 DU/acre. The proposed building would have a maximum height of 90 feet, including 5.5 levels of residential development over

2.5 levels of parking in an enclosed parking garage. The Project includes approximately 8,500 SF of open space, and 250 parking spaces within the parking garage. The Project proposes an approximately 2,520-SF (42' x 60') digital, animated sign on the building's north face, which would be used for offsite commercial advertising, as may also be used for community events. The GTODSP also includes an infrastructure and access plan for various travel modes including automobiles, transit, bicycles, and pedestrians. The requested entitlements include a General Plan Amendment, Zone Change and Zone Text Amendment, Lot Merger, Specific Plan, Site Plan Review, and a Development Agreement to provide a monetary community benefit to the City from the digital billboard and provide that the development standards not change for a set number of years.

Environmental Issues to be Evaluated in the Environmental Impact Report - Based on the Initial Study, the Project would result in potentially significant environmental impacts to the areas listed below that will be further evaluated in the EIR:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

Cortese List Notice: Pursuant to Public Resources Code 21092.6(a), the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 (California Department of Toxic Substances Control list of various hazardous sites).

Environmental Review - A copy of this NOP and the Initial Study are available for review on the City of Gardena's Website: https://www.cityofgardena.org/community-development/planning-projects/.

If you cannot access the documents from the website, please contact John F. Signo, AICP, Senior Planner, at 310.217.9530 or via email at jsigno@cityofgardena.org.

Comment Period - The NOP's public review comment period is from August 20 – September 18, 2020. Public agencies, interested organizations, and individuals have the opportunity to comment on the proposed Project, to identify those environmental issues, potentially affected by the Project, which the City should address further in the EIR. Comments on the NOP can be submitted to John F. Signo, AICP, Senior Planner, at the City of Gardena by mail at City of Gardena Community Development Department, 1700 W. 162nd Street, Gardena, California 90247, or by email at jsigno@cityofgardena.org, by 5:00 PM on September 18, 2020. However, e-mail is the preferred method of communication. Please label the subject line "GTODSP/NOP Comment."

Scoping Meeting - Pursuant to CEQA Statue §21083.9(a)(2) and State CEQA Guidelines §15082(c), the City of Gardena will hold a public scoping meeting on September 2, 2020 at 7:00 PM (to be held online) at https://us02web.zoom.us/webinar/register/WN_1f8h_GDjTtubpFcr_yPO7g. At this meeting, agencies, organizations, and members of the public will receive a brief presentation on the Project and will have the opportunity to provide comments on the scope of the information and analysis to be included in the EIR.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 266-3574
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

September 10, 2020

John F. Signo, Senior Planner
City of Gardena
1700 West 162nd Street
Gardena, California 90247

RE: Gardena Transit Oriented Development Specific Plan Project – Notice of Preparation (NOP)
SCH# 2020080305
GTS# 07-LA-2020-03341
Vic. LA 105 PM R4.74

Dear John F. Signo,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes to develop up to 265 dwelling units (DUs) and adopt the Gardena Transit-Oriented Development Specific Plan Specific Plan ("GTODSP"). The Project would replace an existing auto parts warehouse use with an eight-story residential building with up to 265 DUs at a density of 199 DU/acre. The proposed building would have a maximum height of 90 feet, including 5.5 levels of residential development over 2.5 levels of parking in an enclosed parking garage. The Project includes approximately 8,500 SF of open space, and 267 parking spaces within the parking garage. The Project proposes an approximately 2,520-SF (42' x 60') digital, animated sign on the building's north face, which would be used for offsite commercial advertising/community events, and a Development Agreement to provide a monetary community benefit to the City from the digital billboard. The GTODSP also includes an infrastructure and access plan for various travel modes including automobiles, transit, bicycles, and pedestrians.

After reviewing the NOP, Caltrans has the following comments:

Caltrans acknowledges and supports infill development that prioritizes nearby transit service, promotes active transportation, and provides a mixture of land uses that keep the goods and services people need in close proximity to where they work and live. For the GTODSP to achieve the highest ridership, greatest mode-shift, and effectively improve the mobility of Californians, Caltrans recommends the following:

- Creating a direct and safe connection from the project site to the Laguna Dominguez Trail for pedestrians and people riding bikes.

- Building a safe and viable way for people using the Laguna Dominguez Trail to cross W. El Segundo Boulevard. Examples of adequate crossing infrastructure include curb extensions, pedestrian refuge islands, and reductions in crossing distances through roadway narrowing. Visual indicators such as, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.

- Consider similar improvements to Crenshaw Boulevard to create a safe and equitable space for residents who walk or bike to their destinations. This includes, street furniture, roadway narrowing, shade trees, native landscaping, bioswales, street furniture, bicycle parking, bus shelters and trash cans. Bus bulb-outs should also be considered to reduce conflict between bicycles and buses on busy roads like Crenshaw and W. El Segundo.

- Caltrans concurs with the unbundling of motor vehicle parking spaces from the monthly cost of the project's residential rental units as stated in section 2.3.2. However, Caltrans still recommends reducing the total amount of parking whenever possible, as research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of additional Transportation Demand Management (TDM) strategies as an alternative to building an unnecessary amount of parking.

- If the parking structure must be built, it should be designed in a way that is conducive to adaptive reuse. It should contain flat floors with ramps on the exterior edge, so that it can be more easily converted to more beneficial uses in the future.

- Providing at least one secure, long-term, bicycle parking space per residential unit.

Caltrans looks forward to reviewing the forthcoming Vehicle Miles Travelled (VMT) analysis to confirm that the Project will result in a net reduction in per capita VMT, as well as the full *Infrastructure and Access Plan* referenced in section 2.3.2. If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03341.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2426
www.fire.lacounty.gov

"Proud Protectors of Life, Property, and the Environment"

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

September 10, 2020

John Signo, Senior Planner
City of Gardena
Community Development Department
1700 West 162nd Street
Gardena, CA 90247

Dear Mr. Signo:

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT, "GARDENA TRANSIT-ORIENTED DEVELOPMENT SPECIFIC PLAN PROJECT," WOULD REPLACE AN EXISTING AUTO PARTS WAREHOUSE WITH AND EIGHT-STORY RESIDENTIAL BUILDING WITH UP TO 265 DUs AT A DENSITY OF 199 DU/ACRE, THE PROPOSED BUILDING WOULD HAVE A MAXIMUM HEIGHT OF 90 FEET, INCLUDING 5.5 LEVELS OF RESIDENTIAL DEVELOPMENT OVER 2.5 LEVELS OF PARKING IN AN ENCLOSED PARKING GARAGE, 12850-12900 CRENSHAW BOULEVARD, GARDENA, FFER 2020005828

The Notice of Preparation of an Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

We have no comments.

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

2. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than 28 feet in width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building. The roadway shall provide approved signs and/or stripping stating "NO PARKING - FIRE LANE" and shall be maintained in accordance with the County of Los Angeles Fire Code.

3. 503.1.1 Buildings and facilities. Approved Fire Apparatus Access Roads shall be provided for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction. The Fire Apparatus Access Road shall comply with the requirements of this section and shall extend to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility.

4. 503.2.1.2 Commercial, industrial, and multifamily-residential developments. Fire Apparatus Access Roads for commercial, industrial, and multifamily-residential developments shall be installed and arranged in accordance with Sections 503.2.1.2.1 through 503.2.1.2.2. For purposes of this section, the highest roof surface shall be determined by measurement of the vertical distance between the access roadway and the eave of a pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, whichever is greater.

5. 503.2.1.2.2 Where the highest roof surface exceeds 30 feet. For buildings where the vertical distance between the access roadway and the highest roof surface exceeds 30 feet, an approved Fire Apparatus Access Roadway with a minimum width of 28 feet, exclusive of shoulders, shall be provided in the immediate vicinity of the building or portion thereof. This roadway shall have an unobstructed clearance of clear to the sky.

6. Every building constructed shall provide an adequate water supply for fire protection purposes. The fire hydrant spacing shall be 300 feet and plotted by the County of Los Angeles Fire Department. Fire Flow requirements shall be determined upon submittal to the County of Los Angeles Fire Department's Fire Prevention, Land Development Unit. Actual fire flow will be determined utilizing the County of Los Angeles Fire Code Appendix B, Table B105.1.

7. An approved fire sprinkler system in the proposed building in compliance with applicable codes and regulations will qualify for a fire flow reduction as outlined Table B105.1 of the County of Los Angeles Fire Code.

8. 507.1 Required water supply. An approved water supply capable of supplying the required fire flow for fire protection shall be provided to premises on which facilities, buildings, or portions of buildings are hereafter constructed or moved into or within the jurisdiction.

9. 507.3 Fire Flow. Fire flow requirements for buildings or portions of buildings and facilities shall be determined by an approved method or Appendix B.

10. Fire Hydrant spacing for the proposed development shall be 300 feet. The County of Los Angeles Fire Department shall plot required fire hydrants as required to meet the spacing requirements.

11. 503.2.1.2.2.1 Proximity to Building. At least one required access route meeting this condition shall be located such that the edge of the Fire Apparatus Access Roadway, not including shoulder, that is closest to the building being served, is between 10 feet and 30 feet, from the building, as determined by the fire code official, and shall be positioned parallel to one entire side of the building. The side of the building on which the Fire Apparatus Access Road is positioned shall be approved by the fire code official.

12. 503.2.1.2.2.2 Obstructions. Overhead utility and power lines shall not be located over the Fire Apparatus Access Road or between the fire apparatus road and the building. Other obstructions shall be permitted to be placed with the approval of the fire code official.

13. The proposed development shall comply with the County of Los Angeles Fire Department Regulation No. 27. Requirements for Building, Construction, and Land Use Within or Adjacent to High Voltage Transmission Lines.

14. 503.2.4 Turning radius. The minimum turning radius shall be not less than 32 feet, measured at the centerline of the required access roadway. Clearly indicate the turning radius on the site plan for all turns associated with on-site Fire Department access.

15. 503.2.3 Surface. Facilities, buildings, or portions of buildings hereafter constructed shall be accessible to fire department apparatus by way of an approved Fire Apparatus Access Road that is designed and maintained with an asphalt, concrete, or other approved driving surface capable of supporting the imposed load of fire apparatus weighing at least 75,000 pounds.

16. 503.2.2.1 Dimensions maintained. The dimensions of approved fire apparatus roads shall be maintained as originally approved by the fire code official.

17. 503.6 Gates. The installation of security gates across a Fire Apparatus Access Road shall be approved by the fire code official. Where security gates are installed they shall have an approved means of emergency operation.

18. Gates securing the Fire Apparatus Access Roads shall comply with all of the following criteria:

    a. Where a single gate is provided, the gate width shall not be less than 20 feet, except on a fire apparatus roadway approved to be a lesser width, in which case the gate shall not restrict that width. Where a fire apparatus road consists of a divided roadway, the gate width shall not be less than 15 feet for residential use and 20 feet for commercial/industrial uses.

    b. Gates shall be of the swinging or sliding type.

    c. Construction of gates shall be of materials that allow manual operation by one person.

    d. Gate components shall be maintained in an operative condition at all times and replaced or repaired when defective.

    e. Electric gates shall be equipped with a means of opening the gate by fire department personnel for emergency access. Emergency opening devices shall be approved by the fire code official.

    f. Methods of locking shall be submitted for approval by the fire code official.

    g. Electric gate operators, where provided, shall be listed in accordance with UL 325.

    h. Gates intended for automatic operation shall be designed, constructed, and installed to comply with the requirements of ASTM F2200.

19. 503.2.9 Area of firefighting operations. The area of firefighting operations shall not be located underneath high voltage transmission lines.

20. 503.3 Marking and signage. Where required by the fire code official, approved signs or other approved notices or markings that include the words "NO PARKING – FIRE LANE" shall be provided for Fire Apparatus Access Roads to identify such roads, to clearly indicate the access to such roads, or to prohibit the obstruction thereof. The means by which fire lanes are designated shall be maintained in a clean and legible condition at all times and be replaced or repaired when necessary to provide adequate visibility. A no-parking designation shall met the requirements of California Vehicle Code Section 22500.1 and be approved by the fire code official.

21. Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be posted on one or both sides of the Fire Apparatus Access Road as required.

22. 503.4 Obstruction of Fire Apparatus Access Roads. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Sections 503.2.1 and 503.2.2 shall be maintained at all times.

23. 503.4.1 Traffic calming devices. Traffic calming devices, including but not limited to, speed bumps and speed humps shall be prohibited unless approved by the fire code official.

24. 504.1 Required access. Exterior doors and openings required by this code or the California Building Code shall be maintained readily accessible for emergency access by the fire department. An approval access walkway leading from Fire Apparatus Access Roads to exterior openings shall be provided for where required by the fire code official.

25. 504.5 Rooftop barriers and parapets. No person shall install any security barrier, visual barrier screen, or other obstruction on; the roof of any building in such a manner as to obstruct firefighter ingress or egress in the event of fire or other emergency. Parapet shall not exceed 36 inches on at least two sides of the building. These sides should face an access roadway or yard sufficient to accommodate ladder operations.

26. 505.1 Address identification. New and existing buildings shall be provided with approved address identification. The address identification shall be legible and placed in a position that is visible from the street or road fronting the property. Address identification shall be legible and placed in a position that is visible from the street or road fronting the property. Address identification characters shall contrast with their background. Address numbers shall be Arabic numbers or alphabetical letters. Numbers shall not be spelled out. Each character shall be not less than 4 inches high with a minimum stroke width of ½ inch. Where required by the fire code official, address identification shall be provided in additional approved locations to facilitate emergency response. Where access is by means of a private road and the building cannot be viewed from the public way, a monument, pole or other sign or means shall be used to identify the structure. Address identification shall be maintained.

27. 505.1.1 Multiple residential and commercial units. Multiple residential and commercial units having entrance doors not visible from the street or road shall have, in addition to the requirements of Section 505.1 above, approved numbers grouped for all units within each structure and positioned to be plainly visible from the street or road. Said numbers may be grouped on the wall of the structure or on a mounting post independent of the structure.

28. 507.5.4 Obstruction. Unobstructed access to fire hydrants shall be maintained at all times. The fire department shall not be deterred or hindered from gaining immediate access to fire protection equipment or fire hydrants.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

September 18, 2020

John F. Signo, AICP
Community Development Department
City of Gardena
1700 W. 162nd Street
Gardena, CA 90247
Sent by email: jsigno@cityofgardena.org

RE: Gardena Transit-Oriented Development Specific Plan Project
12850-12900 Crenshaw Boulevard
Notice of Preparation of Environmental Impact Report (EIR)

Dear Mr. Signo:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Gardena Transit-Oriented Development Specific Plan Project (Project) located at 12850-12900 Crenshaw Boulevard (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.[1]

In addition to the specific comments outlined below, Metro is providing the City and Applicant with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at www.metro.net/projects/devreview/.

[1] See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Project Description
The Project includes replacing an existing auto parts warehouse with an eight-story residential building with up to 265 dwelling units. The Project would have a maximum height of 90 feet, including 5.5 levels of residential development over 2.5 levels of parking in an enclosed parking garage.

Recommendations for EIR Scope and Content

Bus Service Adjacency

1. Service: Metro Bus Line 210 operates on Crenshaw Boulevard, adjacent to the Project. Other transit operators such as Torrance Transit may provide service in the vicinity of the Project and should be consulted.

2. Impact Analysis: The EIR should analyze potential effects on Metro Bus service and identify mitigation measures or project design features as appropriate. Potential impacts may include impacts to transportation services. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:

    a. Driveways: Driveways accessing parking and loading at the Project site should be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible.

Transit Supportive Planning: Recommendations and Resources

Considering the Project's proximity to the Crenshaw Boulevard Station, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Transit Supportive Planning Toolkit: Metro strongly recommends that the Applicant review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at https://www.metro.net/projects/tod-toolkit.

2. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Applicant to be mindful of the Project's proximity to the Crenshaw Boulevard Station, including orienting pedestrian pathways towards the station.

3. Transit Connections and Access: Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby

destinations. The City should consider requiring the installation of such features as part of the conditions of approval for the Project, including:

a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby bus stops and the Crenshaw Boulevard Station.

b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged.

c. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf

4. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

5. Transit Pass Programs: Metro would like to inform the Applicant of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs' website at https://www.metro.net/riding/eapp/.

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,

Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: https://www.metro.net/projects/devreview/

Los Angeles County
Metropolitan Transportation Authority

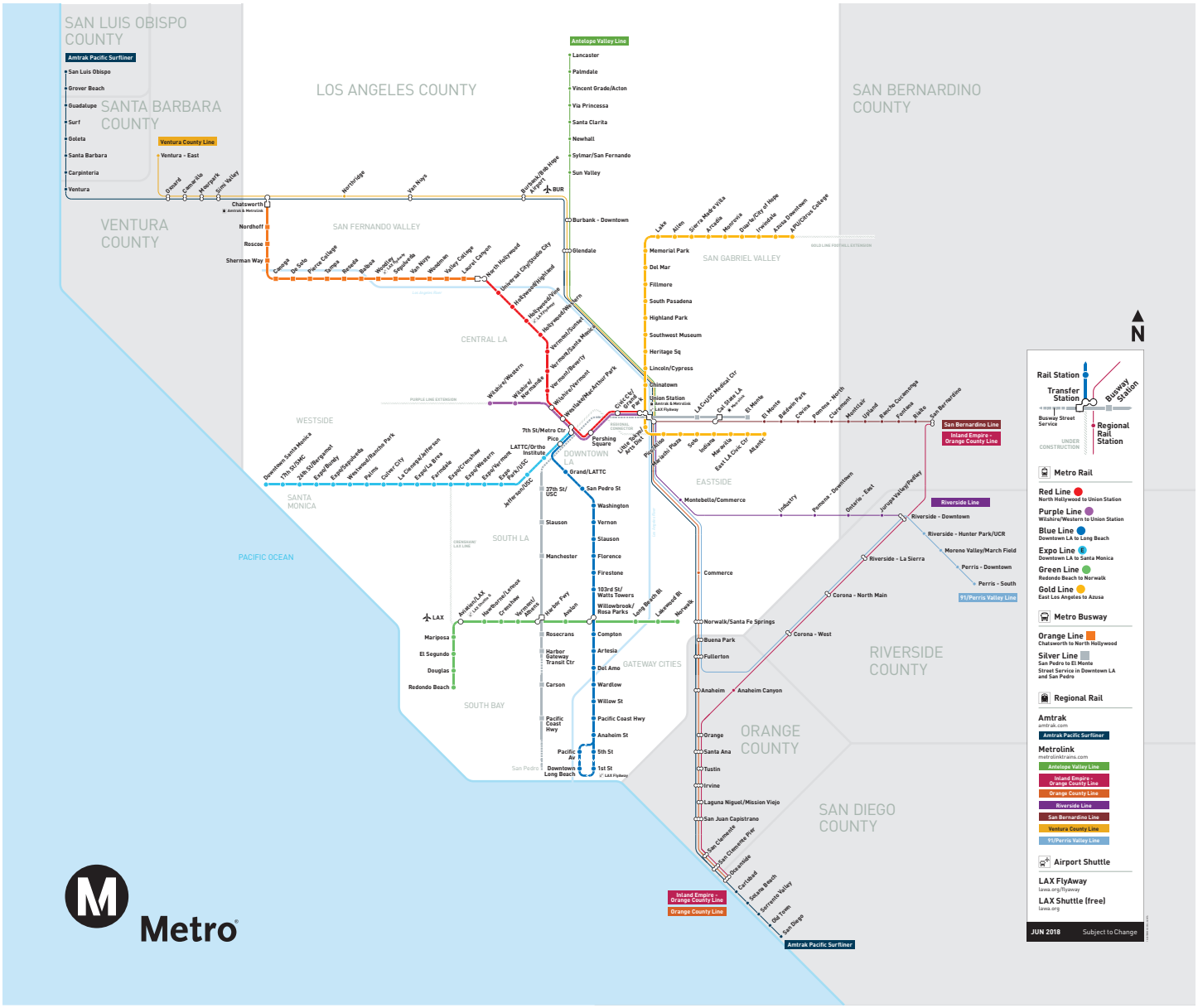
METRO ADJACENT DEVELOPMENT HANDBOOK

A GUIDE FOR CITIES AND DEVELOPERS

JANUARY 2020

Metro

Metro and Regional Rail Map



Metro is currently undertaking the largest rail infrastructure expansion effort in the United States. A growing transit network presents new opportunities to catalyze land use investment and shape livable communities.

Table of Contents

Quick Overview

Purpose of Handbook

The Metro Adjacent Development Handbook (Handbook) is intended to provide information and guide coordination for projects adjacent to, below, or above Metro transit facilities (e.g. right-of-way, stations, bus stops) and services.

Overarching Goal
By providing information and encouraging early coordination, Metro seeks to reduce potential conflicts with transit services and facilities, and identify potential synergies to expand mobility and improve access to transit.

Intended Audience
The Handbook is a resource for multiple stakeholder groups engaged in the development process, including:

- Local jurisdictions who review, entitle, and permit development projects,
- Developers,
- Property owners,
- Architects, engineers, and other technical consultants,
- Builders/contractors,
- Utility companies, and
- other Third Parties.

Handbook Content
The Handbook includes:

- **Introduction** of Metro's Development Review coordination process, common concerns, and typical stages of review.
- **Information** on best practices during three key coordination phases to avoid potential conflicts or create compatibility with the Metro transit system:
  - Planning & Conceptual Design,
  - Engineering & Technical Review, and
  - Construction Safety & Monitoring.
- **Glossary** with definitions for key terms used throughout the Handbook.

RULE OF THUMB: 100 FEET

Metro's Development Review process applies to projects that are within 100 feet of Metro transit facilities.

While the Handbook summarizes key concerns and best practices for adjacency conditions, it does not replace Metro's technical requirements and standards.

Prior to receiving approval for any construction activities adjacent to, above, or below Metro facilities, Third Parties must comply with the Metro Adjacent Construction Design Manual, available on Metro's website.

Contact Us
For questions, contact the Development Review Team:

- Email: devreview@metro.net
- Phone: 213.418.3484

Additional Information & Resources

- Metro Development & Construction Coordination website: https://www.metro.net/devreview
- Metro GIS/KML ROW Files: https://developer.metro.net/portfolio-item/metro-right-of-way-gis-data
- Metrolink Standards and Procedures: https://www.metrolinktrains.com/about/agency/engineering--construction

Metro will continue to revise the Handbook, as needed, to reflect updates to best practices in safety, operations, and transit-supportive development.

Background

Who is Metro?

The Los Angeles County Metropolitan Transportation Authority (Metro) plans, funds, builds, and operates rail, bus, and other mobility services (e.g. bikeshare, microtransit) throughout Los Angeles County (LA County). On average, Metro moves 1.3 million people each day on buses and trains. With funding from the passage of Measure R (2008) and Measure M (2016), the Metro system is expanding. Over the next 40 years, Metro will build over 60 new stations and over 100 miles of transit right-of-way (ROW). New and expanded transit lines will improve mobility across LA County, connecting riders to more destinations and expanding opportunities for development that supports transit ridership. Metro facilities include:

Metro Rail: Metro operates heavy rail (HRT) and light rail (LRT) transit lines in underground tunnels, along streets, off-street in dedicated ROW, and above street level on elevated structures. Heavy rail trains are powered by a "third rail" along the tracks. Light rail vehicles are powered by overhead catenary systems (OCS). To support rail operations, Metro owns and maintains traction power substations (TPSS), maintenance yards, and other infrastructure.

Metrolink/Regional Rail: Metro owns a majority of the ROW within LA County on which the Southern California Regional Rail Authority (SCRRA) operates Metrolink service. Metrolink is a commuter rail system with seven lines that span 388 miles across five counties, including: Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego. As a SCRRA member agency and property owner, Metro reviews development activity adjacent to Metro-owned ROW on which Metrolink operates, and coordinates with Metrolink on any comments or concerns. Metrolink has its own set of standards and processes, see link on page 1.

Metro Bus Rapid Transit (BRT): Metro operates accelerated bus transit, which acts as a hybrid between rail and traditional bus service. Metro BRT may operate in a dedicated travel lane within a street or freeway, or off-street along dedicated ROW. Metro BRT stations may be located on sidewalks within the public right-of-way, along a median in the center of streets, or off-street on Metro-owned property.

Metro Bus: Metro operates 170 bus lines across more than 1,400 square miles in LA County. The fleet serves over 15,000 bus stops with approximately 2,000 buses. Metro operates "Local" and "Rapid" bus service within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes. Metro bus stops are typically located on sidewalks within the public right-of-way, which is owned and maintained by local jurisdictions.

Why is Metro interested in adjacent development?

Metro Supports Transit Oriented Communities: Metro is redefining the role of the transit agency by expanding mobility options, promoting sustainable urban design, and helping transform communities throughout LA County. Metro seeks to partner with local, state, and federal jurisdictions, developers, property owners and other stakeholders across LA County on transit-supportive planning and developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Adjacent Development Leads to Transit Oriented Communities: Metro supports private development adjacent to transit as this presents a mutually beneficial opportunity to enrich the built environment and expand mobility options. By connecting communities, destinations, and amenities through improved access to public transit, adjacent developments have the potential to:

- reduce auto dependency,
- reduce greenhouse gas emissions,
- promote walkable and bikeable communities that accommodate more healthy and active lifestyles,
- improve access to jobs and economic opportunities, and
- create more opportunities for mobility – highly desirable features in an increasingly urbanized environment.

Opportunity: Acknowledging an unprecedented opportunity to influence how the built environment develops along and around transit and its facilities, Metro has created this document. The Handbook helps ensure compatibility between private development and Metro's transit infrastructure to minimize operational, safety, and maintenance issues. It serves as a crucial first step to encourage early and active collaboration with local stakeholders and identify potential partnerships that leverage Metro initiatives and support TOCs across LA County.

Metro Purview & Concerns

Metro Purview for Review & Coordination

Metro is interested in reviewing development, construction, and utility projects within 100 feet of Metro transit facilities, real estate assets, and ROW – as measured from the edge of the ROW outward – both to ensure the structural safety of existing or planned transit infrastructure and to maximize integration opportunities with adjacent development. The Handbook seeks to:

- Improve communication and coordination between developers, jurisdictions, and Metro.
- Identify common concerns associated with developments adjacent to Metro ROW.
- Highlight Metro operational needs and requirements to ensure safe, continuous service.
- Prevent potential impacts to Metro transit service or infrastructure.
- Maintain access to Metro facilities for riders and operational staff.
- Avoid preventable conflicts resulting in increased development costs, construction delays, and safety impacts.
- Streamline the review process to be transparent, clear, and efficient.
- Assist in the creation of overall marketable and desirable developments.

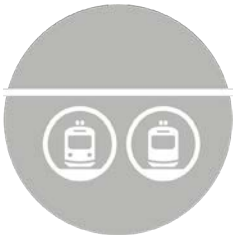
Key Audiences for Handbook

The Handbook is intended to be used by:

- Local jurisdictions who review, entitle, and permit development projects and/or develop policies related to land use, development standards, and mobility,
- Developers, property owners,
- Architects, engineers, design consultants,
- Builders/contractors,
- Entitlement consultants,
- Environmental consultants,
- Utility companies, and
- other Third Parties.

Metro Assets & Common Concerns for Adjacent Development

The table on the facing page outlines common concerns for development projects and/or construction activities adjacent to Metro transit facilities and assets. These concerns are discussed in greater detail in the following chapters of the Handbook.

METRO ASSETS	COMMON ADJACENCY CONCERNS
 **UNDERGROUND ROW** Transit operates below ground in tunnels.	• Excavation near tunnels and infrastructure • Clearance from support structures (e.g. tiebacks, shoring, etc) • Coordination with utilities • Clearance from ventilation shafts, surface penetrations (e.g. emergency exits) • Surcharge loading of adjacent construction • Explosions • Noise and vibration/ground movement • Storm water drainage
 **AERIAL ROW** Transit operates on elevated guideway, typically supported by columns.	• Excavation near columns and support structures • Column foundations • Clearance from OCS • Overhead protection and crane swings • Setbacks from property line for maintenance activities to occur without entering ROW • Coordination with utilities • Noise reduction (e.g. double-paned windows)
 **AT-GRADE ROW** Transit operates in dedicated ROW at street level; in some cases tracks are separated from adjacent property by fence or wall.	• Pedestrian and bicycle movements and safety • Operator site distance/cone of visibility • Clearance from OCS • Crane swings and overhead protection • Trackbed stability • Storm water drainage • Noise/vibration • Driveways near rail crossings • Setbacks from property line for maintenance activities to occur without entering ROW • Utility coordination
 **BUS STOPS** Metro operates bus service on city streets. Bus stops are located on public sidewalks.	• Lane closures and re-routing service during construction • Temporary relocation of bus stops • Impacts to access to bus stops
 **NON-REVENUE/OPERATIONAL** Metro owns and maintains property to support operations (e.g. bus and rail maintenance facilities, transit plazas, traction power substations, park-and-ride parking lots).	• Excavation and clearance from support structures (e.g. tiebacks, shoring, etc) • Ground movement • Drainage • Utility coordination • Access to property

Metro Coordination Process

Typical Stages of Metro Review and Coordination

Early coordination helps avoid conflicts between construction activities and transit operations and maximizes opportunities to identify synergies between the development project and Metro transit services that are mutually beneficial.

Coordination Goal: Metro encourages developers to consult with the Development Review Team early in the design process to ensure compatibility with transit infrastructure and minimize operational, safety, and maintenance issues with adjacent development. The Development Review team will serve as a case manager to developers and other Third Parties to facilitate the review of plans and construction documents across key Metro departments.

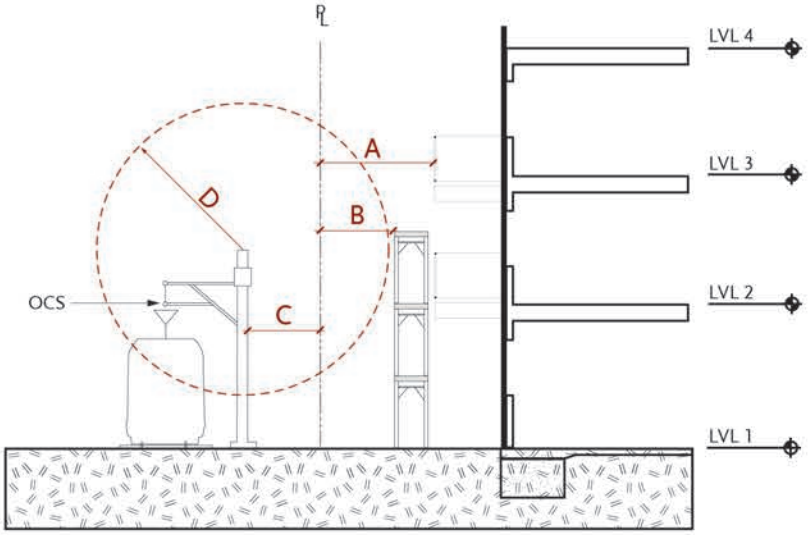
Level of Review: Not all adjacent projects will require significant review and coordination with Metro. The level of review depends on the Project's proximity to Metro, adjacency conditions, and the potential to impact Metro facilities and/or services. For example, development projects that are excavating near Metro ROW or using cranes near transit facilities require a greater level of review and coordination. Where technical review and construction monitoring is needed, Metro charges fees for staff time, as indicated by asterisk in the above diagram.

Permit Clearance: Within the City of Los Angeles, Metro reviews and clears Building & Safety permits for projects within 100 feet of Metro ROW, pursuant to Zoning Information 1117. To ensure timely clearance of these permits, Metro encourages early coordination as noted above.

To begin consultation, submit project information via an online In-Take Form, found on Metro's website. Metro staff will review project information and drawings to screen the project for any potential impacts to transit facilities or services, and determine if require further review and coordination is required. The sample sections on the facing page illustrate adjacency condition information that helps Metro complete project screening.

Contact:
Metro Development Review Team
Website: https://www.metro.net/devreview
Email: devreview@metro.net
Phone: 213.418.3484

Sample Section: Adjacency Conditions



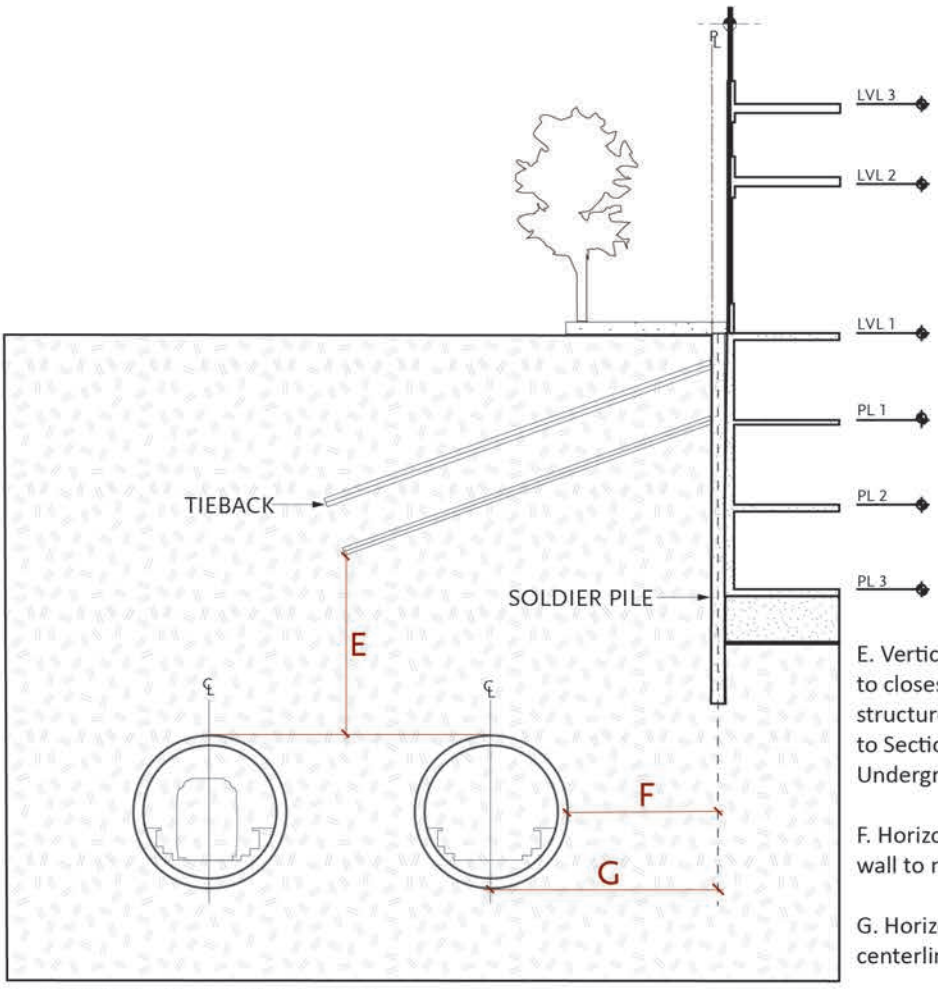
AT-GRADE CONDITION

A. Distance from property line to nearest permanent structure (e.g. building facade, balconies, terraces). Refer to Section 1.3 Building Setback of Handbook.

B. Distance from property line to nearest temporary construction structures (e.g. scaffolding).

C. Distance from property line to nearest Metro facility.

D. Clearance from nearest temporary and/or permanent structure to Overhead Catenary System (OCS). Refer to Section 1.4, OCS Clearance of Handbook.



BELOW-GRADE CONDITION

E. Vertical distance from top of Metro tunnel to closest temporary and/or permanent structure (e.g. tiebacks, foundation). Refer to Section 2.2, Proximity to Tunnels & Underground Infrastructure of Handbook.

F. Horizontal distance from exterior tunnel wall to nearest structure.

G. Horizontal distance from Metro track centerline to nearest structure.

Best Practices

Best Practices for Developer Coordination

Metro encourages developers of projects adjacent to Metro ROW and/or Real Estate Assets to take the following steps to facilitate Metro project review and approval:

1. **Review Metro resources and policies:** The Metro Development & Construction Coordination website and Handbook provide important information for those interested in constructing on, adjacent, over, or under Metro ROW, non-revenue property, or transit facilities. Developers and other Third Parties should familiarize themselves with these resources and keep in mind common adjacency concerns when planning a project.

2. **Contact Metro early during design process:** Metro welcomes the opportunity to provide feedback early in project design, allowing for detection and resolution of important adjacency issues, identification of urban design and system integration opportunities, and facilitation of permit approval. Metro encourages project submittal through the online In-Take Form to begin consultation.

3. **Maintain communication:** Frequent communication with Metro during project design and construction will reinforce relationships and allow for timely project completion.

Best Practices for Local Jurisdiction Notification

To improve communication between Metro and the development community, Metro suggests that local jurisdictions take the following steps to notify property owners of coordination needs for properties adjacent to Metro ROW by:

- **Updating GIS and parcel data:** Integrate Metro ROW files into the City/County GIS and/or Google Earth Files for key departments (e.g. Planning, Public Works, Building & Safety) to notify staff of Metro adjacency and need for coordination during development approval process.

- **Flag Parcels:** Create an overlay zone as part of local Specific Plan(s) and/or Zoning Ordinance(s) to tag parcels that are within 100 feet Metro ROW and require coordination with Metro early during the development process [e.g. City of Los Angeles Zone Information and Map Access System (ZI-1117)].

- **Provide Resources:** Direct all property owners and developers interested in parcels within 100 feet of Metro ROW to Metro's resources (e.g. website, Handbook).


Metro
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Site Plan & Conceptual Design

Site Plan & Conceptual Design

1.1 Supporting Transit Oriented Communities

Transit-oriented communities (TOCs) are places that, by their design, make it more convenient to take transit, walk, bike or roll than to drive. By working closely with the development community and local jurisdictions, Metro seeks to ensure safe construction near Metro facilities and improve compatibility with adjacent development to increase transit ridership.

RECOMMENDATION: Consider site planning and building design strategies to that support transit ridership, such as:

- Leveraging planning policies and development incentives to design a more compelling project that capitalizes on transit adjacency and economy of scales.
- Programming a mix of uses to create lively, vibrant places that are active day and night.
- Utilizing Metro policies and programs that support a healthy, sustainable, and welcoming environment around transit service and facilities.
- Prioritizing pedestrian-scaled elements to create spaces that are comfortable, safe, and enjoyable.
- Activating ground floor with retail and outdoor seating/activities to bring life to the public environment.
- Reducing and screening parking to focus on pedestrian activity.
- Incorporating environmental design elements that help reduce crime (e.g. windows and doors that face public spaces, lighting).

The Wilshire/Vermont Metro Joint Development project leveraged existing transit infrastructure to catalyze a dynamic and accessible urban environment. This project accommodates portal access into the Metro Rail system and on-street bus facilities.

1.2 Enhancing Access to Transit

Metro seeks to create a comprehensive, integrated transportation network and supports infrastructure and design that allows safe and convenient access to its multi-modal services. Projects in close proximity to Metro's services and facilities present an opportunity to enhance the public realm and connections to/from these services for transit riders as well as users of the developments.

RECOMMENDATION: Design projects with transit access in mind. Project teams should capitalize on the opportunity to improve the built environment and enhance the public realm for pedestrians, bicyclists, persons with disabilities, seniors, children, and users of green modes. Metro recommends that projects:

- Orient major entrances to transit service, making access and travel safe, intuitive, and convenient.
- Plan for a continuous canopy of shade trees along all public right-of-way frontages to improve pedestrian comfort to transit facilities.
- Add pedestrian lighting along paths to transit facilities and nearby destinations.
- Integrate wayfinding and signage into project design.
- Enhance nearby crosswalks and ramps.
- Ensure new walkways and sidewalks are clear of any obstructions, including utilities, traffic control devices, trees, and furniture.
- Design for seamless, multi-modal pedestrian connections, making access easy, direct, and comfortable.

The City of Santa Monica leveraged investments in rail transit and reconfigured Colorado Avenue to form a multi-modal first/last mile gateway to the waterfront from the Downtown Santa Monica Station. Photo by PWP Landscape Architecture

1.3 Building Setback

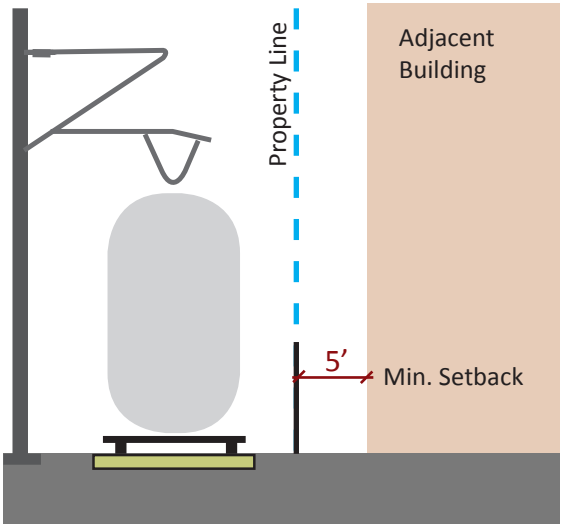
Buildings and structures with a zero lot setback that closely abut Metro ROW can pose concerns to Metro during construction. Encroachment onto Metro property to construct or maintain buildings is strongly discouraged as this presents safety hazards and may disrupt transit service and/or damage Metro infrastructure.

RECOMMENDATION: Include a minimum setback of five (5) feet from the property line to building facade to accommodate the construction and maintenance of structures without the need to encroach upon Metro property. As local jurisdictions also have building setback requirements, new developments should comply with the greater of the two requirements.

Entry into the ROW by parties other than Metro and its affiliated partners requires written approval. Should construction or maintenance of a development necessitate temporary or ongoing access to Metro ROW, a Metro Right of Entry Permit must be requested and obtained from Metro Real Estate for every instance access is required. Permission to enter the ROW is granted solely at Metro's discretion.

Coordination between property owners of fences, walls, and other barriers along property line is recommended. See Section 1.5.

Refer to Section 3.2 – Track Access and Safety for additional information pertaining to ROW access in preparation for construction activities.



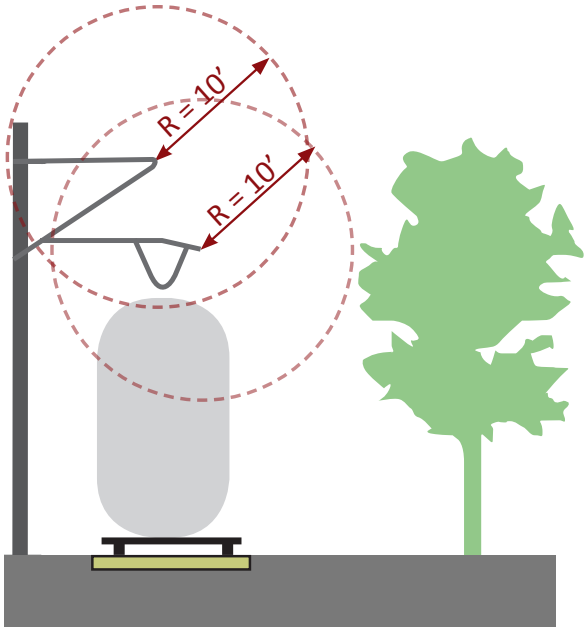
A minimum setback of five (5) feet between an adjacent structure and Metro ROW is strongly encouraged to allow project construction and ongoing maintenance without encroaching on Metro property.

1.4 Overhead Catenary System (OCS) Clearance

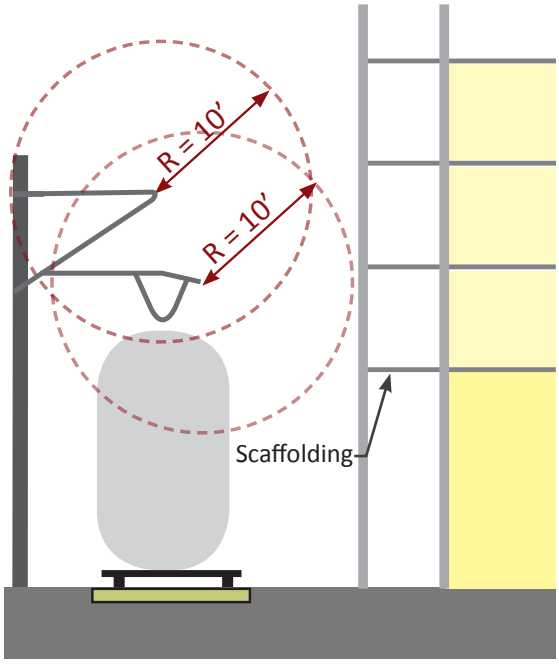
Landscaping and tree canopies can grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains. Building appurtenances facing rail ROW, such as balconies, may also pose safety concerns to Metro operations as objects could fall onto the OCS.

RECOMMENDATION: Design project elements facing the ROW to avoid potential conflicts with Metro transit vehicles and infrastructure. Metro recommends that projects:

- Plan for landscape maintenance from private property and prevent growth into Metro ROW. Property owners will not be permitted to access Metro property to maintain private development.
- Design buildings such that balconies do not provide building users direct access to Metro ROW.
- Maintain building appurtenances and landscaping at a minimum distance of ten (10) feet from the OCS and support structures. If Transmission Power (TP) feeder cable is present, twenty (20) feet from the OCS and support structures is required. Different standards will apply for Metro Trolley Wires, Feeder Cables (wires) and Span Wires.



Adjacent structures and landscaping should be sited and maintained to avoid conflicts with the rail OCS.



Scaffolding and construction equipment should be staged to avoid conflicts with the rail OCS.

1.5 Shared Barrier Construction & Maintenance

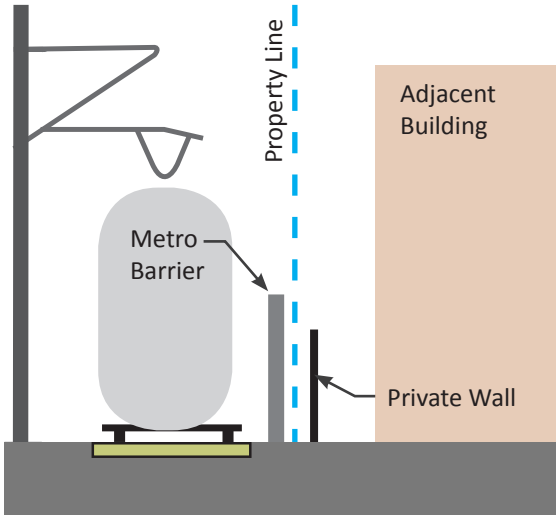
In areas where Metro ROW abuts private property, barrier construction and maintenance responsibilities can be a point of contention with property owners. When double barriers are constructed, the gap created between the Metro-constructed fence and a private property owner's fence can accumulate trash and make regular maintenance challenging without accessing the other party's property.

RECOMMENDATION: Coordinate with Metro Real Estate to create a single barrier condition along the ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout LA County, Metro recommends the following, in order of preference:

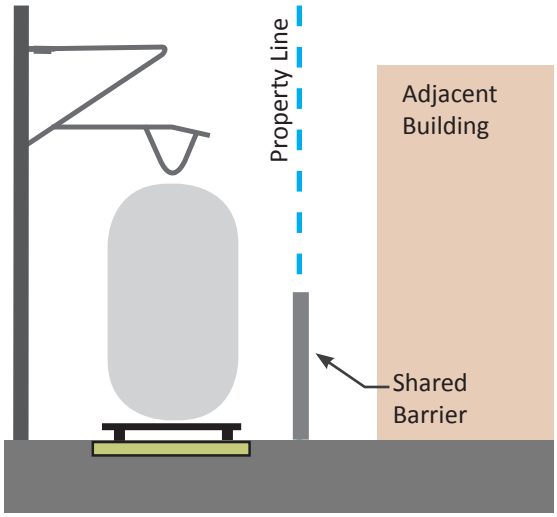
- **Enhance existing Metro barrier:** if structural capacity allows, private property owners and developers should consider physically affixing improvements onto and building upon Metro's existing barrier. Metro is amenable to barrier enhancements such as increasing barrier height and allowing private property owners to apply architectural finishes to their side of Metro's barrier.

- **Replace existing barrier(s):** if conditions are not desirable, remove and replace any existing barrier(s), including Metro's, with a new single "shared" barrier built on the property line.

Metro is amenable to sharing costs for certain improvements that allow for clarity in responsibilities and adequate ongoing maintenance from adjacent property owners without entering Metro's property. Metro Real Estate should be contacted with case-specific questions and will need to approve shared barrier design, shared financing, and construction.



Double barrier conditions allow trash accumulation and create maintenance challenges for Metro and adjacent property owners.



Metro prefers a single barrier condition along its ROW property line.

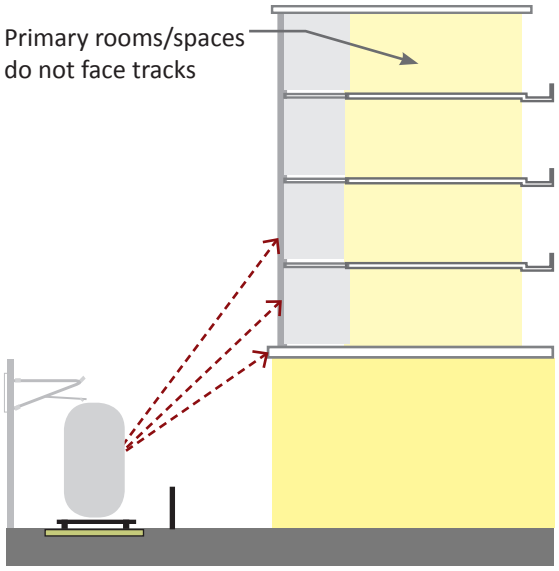
1.6 Project Orientation & Noise Mitigation

Metro may operate in and out of revenue service 24 hours per day, every day of the year, which can create noise and vibration (i.e. horns, power washing). Transit service and maintenance schedules cannot be altered to avoid noise for adjacent developments. However, noise and vibration impacts can be reduced through building design and orientation.

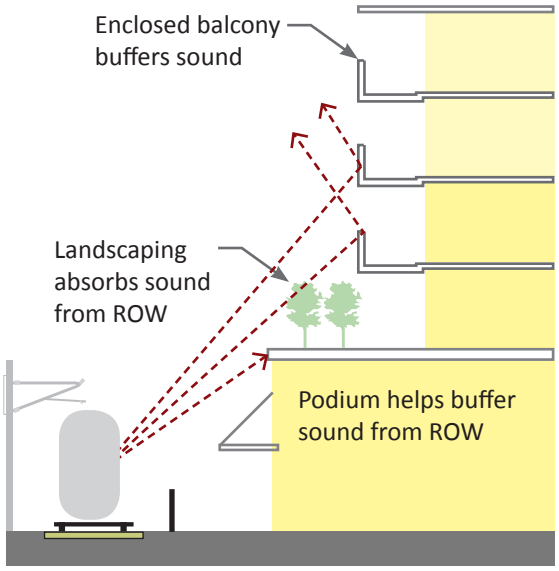
RECOMMENDATION: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

- Locate secondary or "back of house" rooms (e.g. bathrooms, stairways, laundry rooms) along ROW, rather than primary living spaces that are noise sensitive (e.g. bedrooms and family rooms).
- Use upper level setbacks and locate living spaces away from ROW.
- Enclose balconies.
- Install double-pane windows.
- Include language disclosing potential for noise, vibration, and other impacts due to transit proximity in terms and conditions for building lease or sale agreements to protect building owners/sellers from tenant/buyer complaints.

Developers are responsible for any noise mitigation required, which may include engineering designs for mitigation recommended by Metro or otherwise required by local municipalities. A recorded Noise Easement Deed in favor of Metro may be required for projects within 100 feet of Metro ROW to ensure notification to tenants and owners of any proximity issues.



Building orientation can be designed to face away from tracks, reducing the noise and vibration impacts.



Strategic placement of podiums and upper-level setbacks on developments near Metro ROW can reduce noise and vibration impacts.

1.7 At-Grade Rail Crossings

New development is likely to increase pedestrian activity at rail crossings. Safety enhancements may be needed to upgrade existing rail crossings to better protect pedestrians.

RECOMMENDATION: Coordinate with Metro, the California Public Utilities Commission (CPUC), and any other transit operators using the crossing (e.g. Metrolink) to determine if safety enhancements are needed for nearby rail crossings.

While Metro owns and operates the rail ROW, the CPUC regulates all rail crossings. Contact the CPUC early in the design process to determine if they will require any upgrades to existing rail crossings. The CPUC may request to review development plans and hold a site visit to understand future pedestrian activity. Metro's Corporate Safety Department can support the developer in coordination with the CPUC.

Gates and pedestrian arms are common types of safety elements for pedestrians at rail crossings.

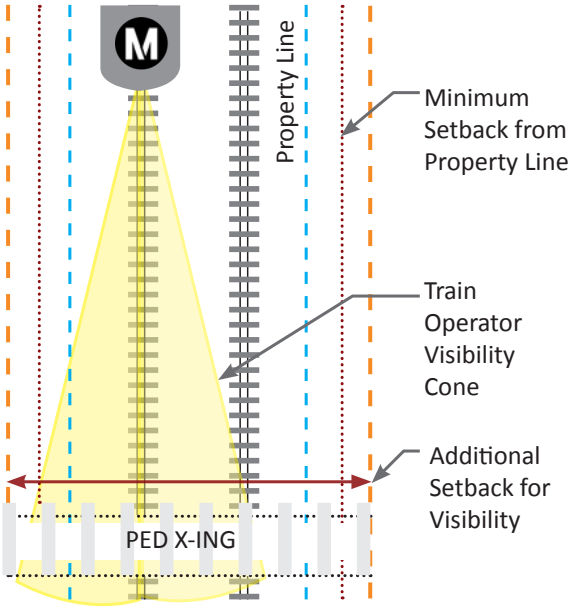
1.8 Sight-lines at Crossings

Developments adjacent to Metro ROW can present visual barriers to transit operators approaching vehicular and pedestrian crossings. Buildings and structures in close proximity to transit corridors can reduce sight-lines and create blind corners where operators cannot see pedestrians. This requires operations to reduce train speeds, which decreases efficiency of transit service.

RECOMMENDATION: Design buildings to maximize transit service sight-lines at crossings, leaving a clear cone of visibility to oncoming vehicles and pedestrians.

Metro Rail Operations will review, provide guidance, and determine the extent of operator visibility for safe operations. If the building envelope overlaps with the visibility cone near pedestrian and vehicular crossings, a building setback may be necessary to ensure safe transit service. The cone of visibility at crossings and required setback will be determined based on vehicle approach speed.

Limited sight-lines for trains approaching street crossings create unsafe conditions.



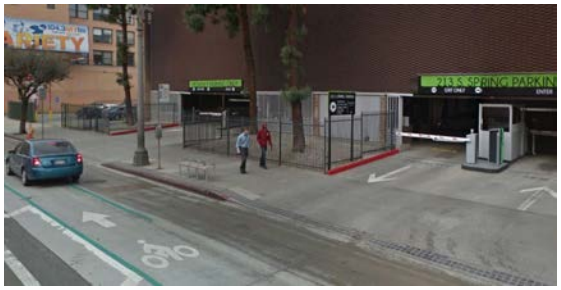
Visibility cones allow train operators to respond to safety hazards.

1.9 Driveway/Access Management

Driveways adjacent to on-street bus stops can create conflict for pedestrians walking to/from or waiting for transit. Additionally, driveways accessing parking lots and loading zones at project sites near Metro Rail and BRT crossings can create queuing issues along city streets and put vehicles in close proximity to fast moving trains and buses, which pose safety concerns.

RECOMMENDATION: Site driveways and other vehicular entrances to avoid conflicts with pedestrians, bicycles, and transit vehicles by:

- Placing driveways along side streets and alleys, away from on-street bus stops and transit crossings to minimize safety conflicts between active ROW, transit vehicles, and people, as well as queuing on streets.
- Locating vehicular driveways away from transit crossings or areas that are likely to be used as waiting areas for transit services.
- Placing loading docks away from sidewalks where transit bus stop activity is/will be present.
- Consolidating vehicular entrances and reduce width of driveways.
- Using speed tables to slow entering/exiting automobiles near pedestrians.
- Separating pedestrian walkways to minimize conflict with vehicles.
- Encouraging safe non-motorized travel.



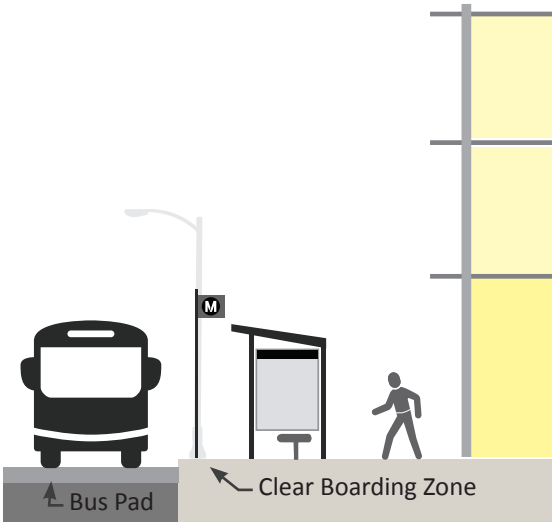
Driveways in close proximity to each other compromise safety for those walking to/from transit and increase the potential for vehicle-pedestrian conflicts.

1.10 Bus Stop & Zones Design

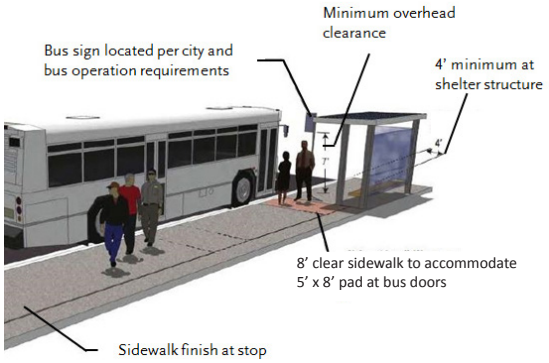
Metro Bus serves over 15,000 bus stops throughout the diverse landscape that is LA County. Typically located on sidewalks within public right-of-way owned and maintained by local jurisdictions, existing bus stop conditions vary from well-lit and sheltered spaces to uncomfortable and unwelcoming zones. Metro is interested in working with developers and local jurisdictions to create a vibrant public realm around new developments by strengthening multi-modal access to/ from Metro transit stops and enhancing the pedestrian experience.

RECOMMENDATION: When designing around existing or proposed bus stops:

- Review Metro's Transit Service Policy, which provides standards for design and operation of bus stops and zones for near-side, far-side, and mid-block stops.
- Review Metro's Transfers Design Guide for more information at https://www.metro.net/projects/station-design-projects/
- Accommodate 5' x 8' landing pads at bus doors (front and back door, which are typically 23 to 25 feet apart).
- Locate streetscape elements (e.g. tree planters, street lamps, benches, shelters, trash receptacles and newspaper stands) outside of bus door zones to protect transit access and ensure a clear path of travel.
- Install a concrete bus pad within each bus stop zone to avoid street asphalt damage.
- Replace stand-alone bus stop signs with bus shelters that include benches and adequate lighting.
- Design wide sidewalks (15' preferred) that accommodate bus landing pads as well as street furniture, landscape, and user travel space.
- Consider tree species, height, and canopy shape (higher than 14' preferred) to avoid vehicle conflicts at bus stops. Trees should be set back from the curb and adequately maintained to prevent visual and physical impediments for buses when trees reach maturity. Avoid planting of trees that have an invasive and shallow root system.



A concrete bus pad should be located at bus stops and bus shelters should be located along sidewalks to ensure an accessible path of travel to a clear boarding area.



Well-designed and accessible bus stops are beneficial amenities for both transit riders and users of adjacent developments.


GORBEL 2.5
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EXCEED RATED CAPACITY
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Engineering & Technical Review

Engineering & Technical Review

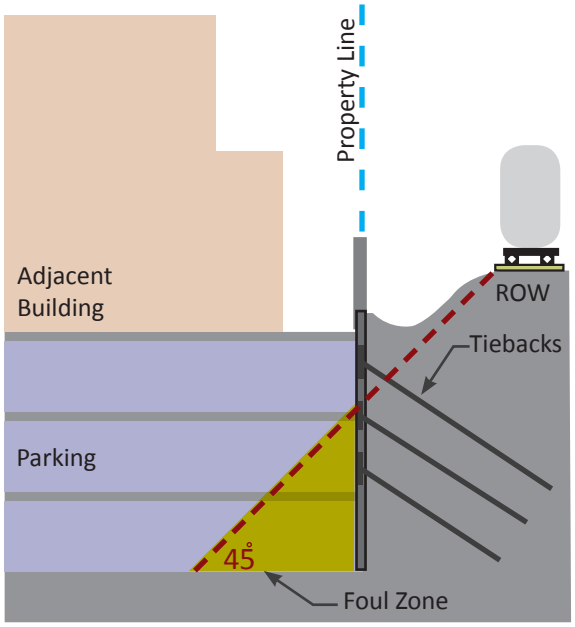
2.1 Excavation Support System Design

Excavation near Metro ROW has the potential to disturb adjoining soils and jeopardize support of existing Metro infrastructure. Any excavation which occurs within the geotechnical foul zone relative to Metro infrastructure is subject to Metro review and approval and meet Cal/OSHA requirements. This foul zone or geotechnical zone of influence shall be defined as the area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast. Construction within this vulnerable area poses a potential risk to Metro service and requires additional Metro Engineering review.

RECOMMENDATION: Coordinate with Metro Engineering staff for review and approval of the excavation support system drawings and calculations prior to the start of excavation or construction. Tiebacks encroaching into Metro ROW may require a tieback easement or license, at Metro's discretion.

Any excavation/shoring within Metrolink operated and maintained ROW will require compliance with SCRRA Engineering standards and guidelines.

See page 7 for a sample section showing Metro adjacent conditions.



An underground structure located within the ROW foul zone would require additional review by Metro.

2.2 Proximity to Tunnels & Underground Infrastructure

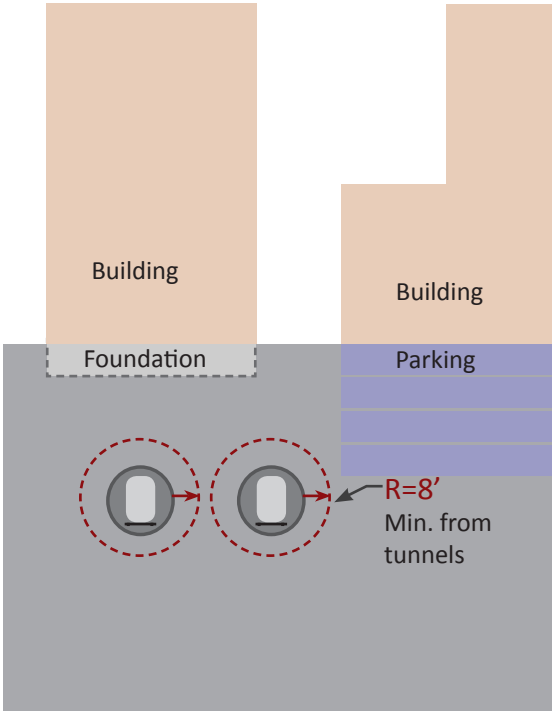
Construction adjacent to, over, or below underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

RECOMMENDATION: Coordinate with Metro early in the design process when proposing to build near underground Metro infrastructure. Metro typically seeks to maintain a minimum eight (8) foot clearance from existing Metro facilities to new construction (shoring or tiebacks). It will be incumbent upon the developer to demonstrate, to Metro's satisfaction, that both the temporary support of construction and the permanent works do not adversely affect the structural integrity, safety, or continued efficient operation of Metro facilities.

Dependent on the nature of the adjacent construction, Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations.

Metro may require monitoring where such work will either increase or decrease the existing overburden (i.e. weight) to which the tunnels or facilities are subjected. When required, the monitoring will serve as an early indication of excessive structural strain or movement. See Section 3.4, Excavation Drilling/Monitoring for additional information regarding monitoring requirements.

See page 7 for a sample section showing Metro adjacent conditions.

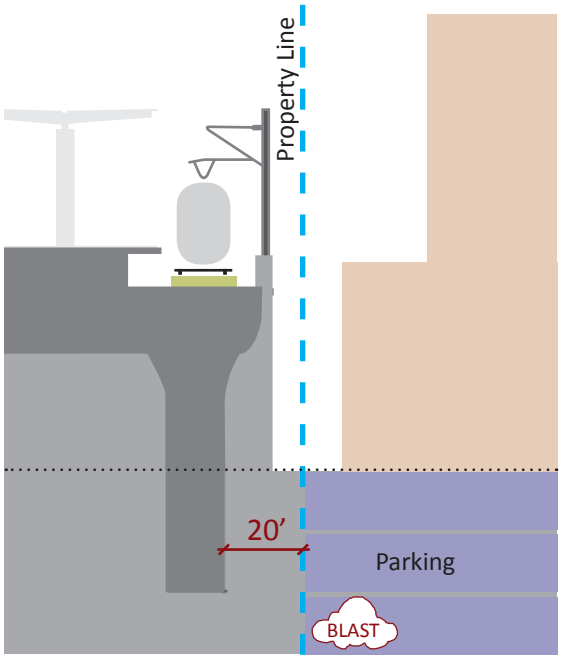


Adjacent project structures in close proximity to underground Metro infrastructure will require additional review by Metro.

2.3 Protection from Explosion/Blast

Metro is obligated to ensure the safety of public transit infrastructure from potential explosive sources which could originate from adjacent underground structures or from at-grade locations, situated below elevated guideways or near stations. Blast protection setbacks or mitigation may be required for large projects constructed near critical Metro facilities.

RECOMMENDATION: Avoid locating underground parking or basement structures within twenty (20) feet from an existing Metro tunnel or facility (exterior face of wall to exterior face of wall). Adjacent developments within this 20-foot envelope may be required to submit a Threat Assessment and Blast/Explosion Study for Metro review and approval.



An underground structure proposed within twenty (20) feet of a Metro structure may require a Threat Assessment and Blast/Explosion Study.

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Construction Safety & Management

Construction Safety & Management

3.1 Pre-Construction Coordination

Metro is concerned with impacts to service requiring rail single line tracking, line closures, speed restrictions, and bus bridging occurring as a result of adjacent project construction. Projects that will require work over, under, adjacent, or on Metro property or ROW and include operation of machinery, scaffolding, or any other potentially hazardous work are subject to evaluation in preparation for and during construction to maintain safe transit operations and passenger well-being.

RECOMMENDATION: Following an initial screening of the project, Metro may determine that additional on-site coordination may be necessary. Dependent on the nature of the adjacent construction, developers may be requested to perform the following as determined on a case-by-case basis:

- Submit a construction work plan and related project drawings and specifications for Metro review.
- Submit a contingency plan, show proof of insurance coverage, and issue current certificates.
- Provide documentation of contractor qualifications.
- Complete pre-construction surveys, perform baseline readings, and install movement instrumentation.
- Complete readiness review and perform practice run of transit service shutdown per contingency plan.
- Designate a ROW observer or other safety personnel and an inspector from the project's construction team.
- Establish a coordination process for access and work in or adjacent to ROW for the duration of construction.

Project teams will be responsible for the costs of adverse impacts to Metro transit operations caused by work on adjacent developments, including remedial work to repair damage to Metro property, facilities, or systems. Additionally, a Construction Monitoring fee may be assessed based on an estimate of required level of effort provided by Metro.

All projects adjacent to Metrolink infrastructure will require compliance with SCRRA Engineering Standards and Guidelines.

Metro may need to monitor development construction near Metro facilities.

3.2 Track Access and Safety

Permission from Metro is required to enter Metro property for rail construction and maintenance along, above, or under Metro ROW as these activities can interfere with Metro utilities and service and pose a safety hazard to construction teams and transit riders. Track access is solely at Metro's discretion and is discouraged to prevent electrocution and collisions with construction workers or machines.

RECOMMENDATION: Obtain and/or complete the following to work in or adjacent to Metro Rail ROW:

1. **Construction Work Plan:** Dependent on the nature of adjacent construction, Metro may request a construction work plan, which describes means and methods and other construction plan details, to ensure the safety of transit operators and riders.

2. **Safety Training:** All members of the project construction team will be required to attend Metro Rail Safety Training before commencing work activity. Training provides resources and procedures when working near active rail ROW.

3. **Right of Entry Permit/Temporary Construction Easement:** All access to and activity on Metro property, including easements necessary for construction of adjacent projects, must be approved through a Right-of-Entry Permit and/or a Temporary Construction Easement obtained from Metro Real Estate and may require a fee.

4. **Track Allocation:** All work on Metro Rail ROW must receive prior approval from Metro Rail Operations Control. Track Allocation identifies, reserves, and requests changes to normal operations for a specific track section, line, station, location, or piece of equipment to allow for safe use by a non-Metro entity. If adjacent construction is planned in close proximity to active ROW, flaggers must be used to ensure safety of construction workers and transit riders.

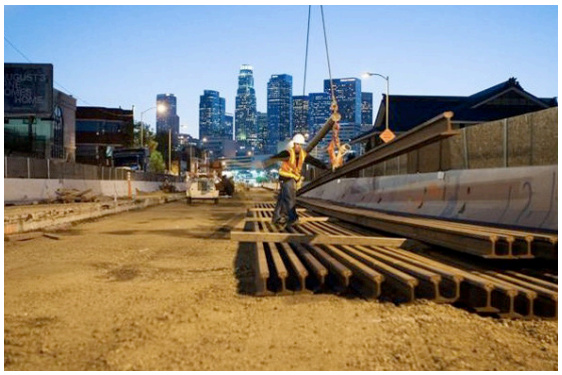
Trained flaggers ensure the safe crossing of pedestrians and workers of an adjacent development.

3.3 Construction Hours

Building near active Metro ROW poses safety concerns and may require limiting hours of construction which impact Metro ROW to night or off-peak hours so as not to interfere with Metro revenue service. To maintain public safety and access for Metro riders, construction should be planned, scheduled, and carried out in a way to avoid impacts to Metro service and maintenance.

RECOMMENDATION: In addition to receiving necessary construction approvals from the local jurisdiction, all construction work on or in close proximity to Metro ROW must be scheduled through the Track Allocation Process, detailed in Section 3.2.

Metro prefers that adjacent construction with potential to impact normal, continuous Metro operations take place during non-revenue hours (approximately 1am-4am) or during non-peak hours to minimize impacts to service. The developer may be responsible for additional operating costs resulting from disruption to normal Metro service.



Construction during approved hours ensures the steady progress of adjacent development construction and minimizes impacts to Metro's transit service.

3.4 Excavation/Drilling Monitoring

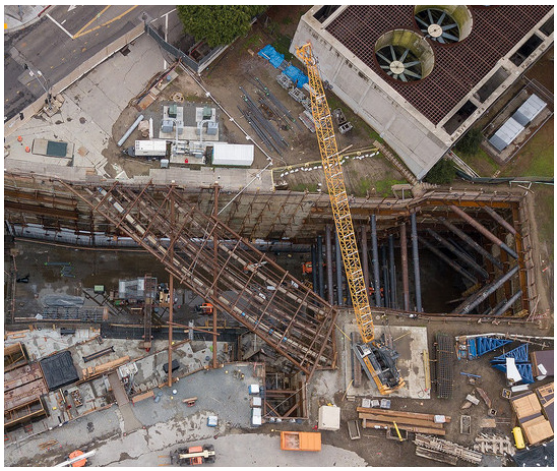
Excavation is among the most hazardous construction activities and can pose threats to the structural integrity of Metro's transit infrastructure.

RECOMMENDATION: Coordinate with Metro Engineering to review and approve excavation and shoring plans during design and development, and well in advance of construction (see Sections 2.1 and 2.2).

Geotechnical instrumentation and monitoring will be required for all excavations occurring within Metro's geotechnical zone of influence, where there is potential for adversely affecting the safe and efficient operation of transit vehicles. Monitoring of Metro facilities due to adjacent construction may include the following as determined on a case-by-case basis:

- Pre- and post-construction condition surveys
- Extensometers
- Inclinometers
- Settlement reference points
- Tilt-meters
- Groundwater observation wells
- Movement arrays
- Vibration monitoring

Excavation and shoring plans must be reviewed by Metro to ensure structural compatibility with Metro infrastructure and safety during adjacent development construction.



A soldier pile wall used for Regional Connector station at 2nd/Hope.

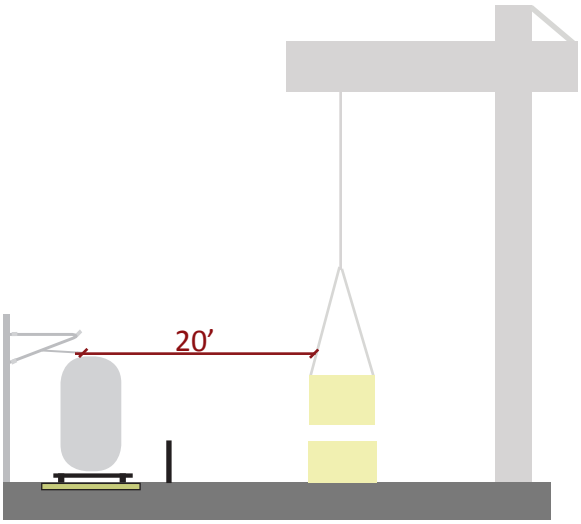
3.5 Crane Operations

Construction activities adjacent to Metro ROW will often require moving large, heavy loads of building materials and machinery by crane. Cranes referred to in this section include all power operated equipment that can hoist, lower, and horizontally move a suspended load. There are significant safety issues to be considered for the operators of crane devices as well as Metro riders and operators.

RECOMMENDATION: Per California Occupational Safety and Health Administration (Cal/OSHA) standards, cranes shall maintain a 20 foot clearance from Metro OCS used to power light rail lines. In the event that a crane or its load needs to enter the 20-foot envelope, OCS lines must be de-energized. De-energizing the Metro OCS is strongly discouraged.

Construction activities which involve swinging a crane and suspended loads over Metro facilities or bus passenger areas shall not be performed during revenue hours. The placement and swing of this equipment are subject to Metro review of a construction work plan request.

Project teams will bear all costs associated with impacts to Metro Rail operations and maintenance.



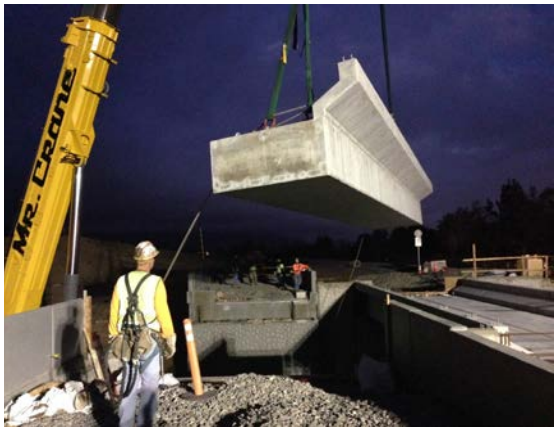
Cranes and construction equipment should be staged to avoid conflicts with the rail OCS.

Construction adjacent to the active ROW may require ongoing coordination with Metro.

3.6 Construction Barriers & Overhead Protection

During construction, falling objects can damage Metro facilities and pose a safety concern to the riders accessing them.

RECOMMENDATION: Erect vertical construction barriers and overhead protection compliant with Metro and Cal/OSHA requirements to prevent objects from falling into Metro ROW or areas designed for public access to Metro facilities. A protection barrier shall be constructed to cover the full height of an adjacent project and overhead protection from falling objects shall be provided over Metro ROW as necessary. Erection of the construction barriers and overhead protection for these areas shall be done during Metro non-revenue hours.



Overhead protection is required when moving heavy objects over Metro ROW or in areas designated for public use.

3.7 Pedestrian & Emergency Access

Metro's riders rely on the consistency and reliability of access and wayfinding to and from stations, stops, and facilities. Construction on adjacent property must not obstruct pedestrian access, fire department access, emergency egress, or otherwise present a safety hazard to Metro operations, its employees, riders, and the general public. Fire access and safe escape routes within all Metro stations, stops, and facilities must be maintained at all times.

RECOMMENDATION: Ensure pedestrian and emergency access from Metro stations, stops, and transit facilities is compliant with the Americans with Disabilities Act (ADA) and maintained during construction:

- Temporary fences, barricades, and lighting should be installed and watchmen provided for the protection of public travel, the construction site, adjacent public spaces, and existing Metro facilities.
- Temporary signage should be installed where necessary and in compliance with the latest California Manual on Uniform Traffic Control Devices (MUTCD) and in coordination with Metro Art and Design Standards.
- Emergency exits shall be provided and be clear of obstructions at all times.
- Access shall be maintained for utilities such as fire hydrants, stand pipes/connections, and fire alarm boxes as well as Metro-specific infrastructure such as fan and vent shafts.

Sidewalk access is blocked for a construction project, forcing pedestrians into the street or to use less direct paths to the Metro facility.

3.8 Impacts to Bus Routes & Stops

During construction, bus stop zones and routes may need to be temporarily relocated. Metro needs to be informed of activities that require stop relocation or route adjustments in order to ensure uninterrupted service.

RECOMMENDATION: During construction, maintain or relocate existing bus stops consistent with the needs of Metro Bus Operations. Design of temporary and permanent bus stops and surrounding sidewalk areas must be compliant with the ADA and allow passengers with disabilities a clear path of travel to the transit service. Existing bus stops must be maintained as part of the final project. Metro Bus Operations Control Special Events Department and Metro Stops & Zones Department should be contacted at least 30 days before initiating construction activities.

Temporary and permanent relocation of bus stops and layover zones will require coordination between developers, Metro, and other municipal bus operators and local jurisdictions.

3.9 Utility Coordination

Construction has the potential to interrupt utilities that Metro relies on for safe operations and maintenance. Utilities of concern to Metro include, but are not limited to, condenser water piping, potable/fire water, storm and sanitary sewer lines, and electrical/ telecommunication services.

RECOMMENDATION: Coordinate with Metro during project design to gauge temporary and permanent utility impacts and avoid conflicts during construction.

The contractor shall protect existing above-ground and underground Metro utilities during construction and coordinate with Metro to receive written approval for any utilities pertinent to Metro facilities that may be used, interrupted, or disturbed.

When electrical power outages or support functions are required, approval must be obtained through Metro Track Allocation in coordination with Metro Real Estate for a Right of Entry Permit.

Coordination of underground utilities is critical to safely and efficiently operate Metro service.

3.10 Air Quality & Ventilation Protection

Hot or foul air, fumes, smoke, steam, and dust from adjacent construction activities can negatively impact Metro facilities, service, and users.

RECOMMENDATION: Ensure that hot or foul air, fumes, smoke, and steam from adjacent facilities are discharged beyond 40 feet from existing Metro facilities, including but not limited to ventilation system intake shafts and station entrances. Should fumes be discharged within 40 feet of Metro intake shafts, a protection panel around each shaft shall be required.

A worker breaks up concrete creating a cloud of silica dust.

Glossary

Cone of Visibility
A conical space at the front of moving transit vehicles allowing for clear visibility of travel way and/or conflicts.

Construction Work Plan (CWP)
Project management document outlining the definition of work tasks, choice of technology, estimation of required resources and duration of individual tasks, and identification of interactions among the different work tasks.

Flagger/Flagman
Person who controls traffic on and through a construction project. Flaggers must be trained and certified by Metro Rail Operations prior to any work commencing in or adjacent to Metro ROW.

Geotechnical Foul Zone
Area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast.

Guideway
A channel, track, or structure along which a transit vehicle moves.

Heavy Rail Transit (HRT)
Metro HRT systems include exclusive ROW (mostly subway) trains up to six (6) cars long (450') and utilize a contact rail for traction power distribution (e.g. Metro Red Line).

Joint Development (JD)
JD is the asset management and real estate development program through which Metro collaborates with developers to build housing, retail, and other amenities on Metro properties near transit, typically through ground lease. JD projects directly link transit riders with destinations and services throughout LA County.

Light Rail Transit (LRT)
Metro LRT systems include exclusive, semi-exclusive, or street ROW trains up to three (3) cars long (270') and utilize OCS for traction power distribution (e.g. Metro Blue Line).

Measure R
Half-cent sales tax for LA County approved in November 2008 to finance new transportation projects and programs. The tax expires in 2039.

Measure M
Half-cent sales tax for LA County approved in November 2016 to fund transportation improvements, operations and programs, and accelerate projects already in the pipeline. The tax will increase to one percent in 2039 when Measure R expires.

Metrolink
A commuter rail system with seven lines throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties governed by the Southern California Regional Rail Authority (SCRRA).

Metro Adjacent Construction Design Manual
Volume III of the Metro Design Criteria & Standards, which outlines the Metro adjacent review procedure as well as operational requirements when constructing over, under, or adjacent to Metro facilities, structures, and property.

Metro Bus
Metro "Local" and "Rapid" bus service runs within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes.

Metro Bus Rapid Transit (BRT)
High quality bus service that provides faster and convenient service through the use of dedicated ROW, branded vehicles and stations, high frequency and intelligent transportation systems, all-door boarding, and intersection crossing priority. Metro BRT may run within dedicated ROW or in mixed flow traffic on streets.

Metro Design Criteria and Standards
A compilation of documents that govern how Metro transit service and facilities are designed, constructed, operated, and maintained.

Metro Rail
Urban rail system serving LA County consisting of six lines, including two subway lines and four light rail lines.

Metro Rail Design Criteria (MRDC)
Volume IV of the Metro Design Criteria & Standards which establishes design criteria for preliminary engineering and final design of a Metro Rail Project.

Metro Transit Oriented Communities
Land use planning and community development program that seeks to maximize access to transportation as a key organizing principle and promote equity and sustainable living by offering a mix of uses close to transit to support households at all income levels, as well as building densities, parking policies, urban design elements, and first/last mile facilities that support ridership and reduce auto dependency.

Noise Easement Deed
Easement granted by property owners abutting Metro ROW acknowledging noise due to transit operations and maintenance.

Overhead Catenary System (OCS)
One or more electrified wires situated over a transit ROW that transmit power to light rail trains via pantograph, a current collector mounted on the roof of an electric vehicle. Metro OCS is supported by hollow poles placed between tracks or on the outer edge of parallel tracks.

Right of Entry Permit
Written approval granted by Metro Real Estate to enter Metro ROW and property.

Right of Way (ROW)
Legal right over property reserved for transportation purposes to construct, protect, maintain and operate transit services.

Southern California Regional Rail Authority (SCRRA)
A joint powers authority made up of an 11-member board representing the transportation commissions of Los Angeles, Orange, Riverside, San Bernardino and Ventura counties. SCRRA governs and operates Metrolink service.

Threat Assessment and Blast/Explosion Study
Analysis performed when adjacent developments are proposed within twenty (20) feet from an existing Metro tunnel or facility.

Track Allocation/Work Permit
Permit granted by Metro Rail Operations Control to allocate a section of track and perform work on or adjacent to Metro Rail ROW. This permit should be submitted for any work that could potentially foul the envelope of a train.

Wayfinding
Signs, maps, and other graphic or audible methods used to convey location and directions to travelers.

metro.net/projects/devreview/

Metro

LOS ANGELES COUNTY
SANITATION DISTRICTS
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

September 10, 2020

Ref. DOC 5878192

Mr. John Signo, AICP, Senior Planner
Community Development Department
City of Gardena
1700 West 162nd Street
Gardena, CA 90247-3732

Dear Mr. Signo:

NOP Response Letter for Gardena
Transit-Oriented Development Specific Plan Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on August 20, 2020. The proposed project is located within the jurisdictional boundary of District No. 5. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Moneta Extension Trunk Sewer Section 1, located in Crenshaw Boulevard at 135th Street. The Districts' 10-inch diameter trunk sewer has a capacity of 0.5 million gallons per day (mgd) and conveyed a peak flow of 0.1 mgd when last measured in 2016.

2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 261.1 mgd.

3. The expected increase in average wastewater flow from the project site, described in the notice as 265 dwelling units, is 41,027 gallons per day, after the structure on the project site is demolished. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the Table 1, Loadings for Each Class of Land Use link.

4. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System. Payment of a connection fee will be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at araza@lacsd.org.

Very truly yours,

Adriana Raza

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: A. Schmidt
A. Howard

LOZEAU DRURY LLP

T 510.836.4200
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1939 Harrison Street, Ste. 150
Oakland, CA 94612

www.lozeaudrury.com
richard@lozeaudrury.com

VIA EMAIL

October 7, 2020

John F. Signo, AICP, Senior Planner
Community Development Department
City of Gardena
1700 W. 162nd Street
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jsigno@cityofgardena.org

Raymond Barragan, Acting Director
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1700 W. 162nd Street
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rbarragan@cityofgardena.org

Mina Semenza – City Clerk
City of Gardena
1700 West 162nd Street, Room 106
Gardena, CA 90247
msemenza@cityofgardena.org

Re: CEQA and Land Use Notice Request for Gardena Transit-Oriented Development Specific Plan Project (SCH 2020080305)

Dear Mr. Signo, Mr. Barragan, and Ms. Semenza:

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER"), regarding the Gardena Transit-Oriented Development Specific Plan Project (SCH 2020080305), including all actions related or referring to the proposed development of an 8-story residential building with up to 265 dwelling units on 5.5 levels over 2.5 levels of parking in an enclosed parking garage, located at 12850 - 12900 Crenshaw Boulevard in Gardena on APN 4060-004-039 ("Project").

We hereby request that the City of Gardena ("City") send by electronic mail, if possible or U.S. Mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.

- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:

    - Notices of any public hearing held pursuant to CEQA.
    - Notices of determination that an Environmental Impact Report ("EIR") is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
    - Notices of any addenda prepared to a previously certified or approved EIR.
    - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
    - Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.

- Notices of availability of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
- Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.
- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

In addition, we request that the City send to us via email, if possible, or U.S. Mail a copy of all Planning Commission and City Council meetings and/or hearing agendas.

Please send notice by electronic mail, if possible, or U.S. Mail to:

Richard Drury
Stacey Oborne
Komalpreet Toor
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
510 836-4200
richard@lozeaudrury.com
stacey@lozeaudrury.com
komal@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,

Stacey Oborne
Paralegal
Lozeau | Drury LLP

NATIVE AMERICAN HERITAGE COMMISSION

August 20, 2020

John F. Signo, Senior Planner
City of Gardena
1700 West 162nd Street
Gardena, CA 90247

Re: 2020080305, Gardena Transit Oriented Development Specific Plan Project, Los Angeles County

Dear Mr. Signo:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.

b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.

c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL: September 8, 2020

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

Notice of Preparation of an Environmental Impact Report for the Gardena Transit-Oriented Development Specific Plan Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send a copy of the EIR upon its completion and public release directly to South Coast AQMD as copies of the EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website[1] as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod[2] land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds[3] and localized significance thresholds (LSTs)[4] to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

[1] South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.
[2] CalEEMod is available free of charge at: www.caleemod.com.
[3] South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
[4] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA ***operational*** thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment[5].

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook[1], South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan[6], and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy[7].

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC200820-05
Control Number

[5] South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.
[6] South Coast AQMD's 2016 Air Quality Management Plan can be found at: http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf (starting on page 86).
[7] Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

Gardena Transit-Oriented Development Specific Plan Project

Initial Study

August 2020

Lead Agency:

City of Gardena
1700 West 162nd Street
Gardena, California 90247
Raymond Barragan
310.217.9500

Consultant:

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1.0 INTRODUCTION

1.1 Statutory Authority and Requirements

This Initial Study has been conducted in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.). Pursuant to State CEQA Guidelines §15063, this Initial Study has been conducted to determine if the proposed Gardena Transit-Oriented Development Specific Plan Project ("Project") would have a significant effect on the environment. The approximately 1.33-acre Project site is at 12850 Crenshaw Boulevard, in the City of Gardena ("City" or "Gardena"), California. The Project would remove all existing on-site structures and in their place construct up to 265 dwelling units (DU), at a density of 199 dwelling units per net-acre (DU/net AC). The Project includes approximately 8,500 square feet (SF) of open space, and 267 parking spaces. The requested approvals include a General Plan Amendment, Zone Change, Zone Code Amendment, Lot Merger, Specific Plan, Development Agreement, and Site Plan Review.

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

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

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

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

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

1.2 Summary of Findings

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

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

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazardous Materials and Waste
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

As set forth in State CEQA Guidelines §15081, the decision to prepare an EIR will be made either during preliminary review under State CEQA Guidelines §15060 or at the conclusion of an Initial Study after applying the standards described in State CEQA Guidelines §15064. On the basis of this initial evaluation, the Lead Agency has found that the proposed Project may have a significant effect on the environment and an EIR will be prepared.

1.3 Initial Study Public Review Process

In accordance with State CEQA Guidelines §15375, the City distributed a Notice of Preparation (NOP) to notify the responsible agencies, trustee agencies, the Office of Planning and Research (OPR), and involved federal agencies that the City (i.e., Lead Agency) plans to prepare an EIR for the Project. The NOP's purpose is to solicit guidance from those agencies as to the scope and content of the environmental information to be included in the EIR.

Within 30 days after receiving the NOP, each responsible and trustee agency and OPR are required to provide the Lead Agency with specific detail about the scope and content of the

environmental information related to the responsible or trustee agency's area of statutory responsibility that must be included in the Draft EIR. During the 30-day public review period, the NOP/Initial Study were made available for review on the City of Gardena Website, at https://www.cityofgardena.org/community-development/planning-projects/, and by request at the Community Development Department- please contact John F. Signo, AICP, Senior Planner, at 310.217.9530 or via email at jsigno@cityofgardena.org. Written responses to the NOP/comments on this Initial Study may be sent to:

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

Please include in the subject matter line "GTOD NOP/IS Comment." Additionally, please note that email is the preferred method.

1.4 Incorporation by Reference

All or portions of another document, which is a matter of public record or is generally available to the public, may be incorporated by reference. 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 document's text.

The references outlined below, which were utilized during preparation of this Initial Study, are available for review on the City of Gardena Website, at https://www.cityofgardena.org/community-development/planning-projects/, and by request at the Community Development Department- please contact John F. Signo, AICP, Senior Planner, at 310.217.9524 or via email at jsigno@cityofgardena.org.

Gardena General Plan 2006. The City adopted the comprehensive Gardena General Plan 2006 (GGP) in 2006 and the Community Development Element's Land Use Plan was updated in June 2012 and March 2013. Additionally, the City's 2014-2021 Housing Element was adopted in November 2013 and found to be in compliance by the Department of Housing and Community Development in December 2013. The Circulation Plan was just updated in July 2020. The GGP constitutes the City's overall plans, goals, and objectives for land use within the City's jurisdiction. The GGP is based upon the following core visions for the City: City of Opportunity; Safe and attractive place to live, work and play; Community that values ethnic and cultural diversity; Strong and diverse economic base. It evaluates the existing conditions and provides long-term goals and policies necessary to guide growth and development in the direction that the community desires. Through its Goals, Objectives, Policies, and Programs, the GGP serves as a decision-making tool to guide future growth and development decisions.

The GGP consists of the following elements and the issues interrelated to each other and are summarized below:

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

The GGP was used throughout this Initial Study as a source of baseline data.

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

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

As of this writing, SCAG is in the process of finalizing the 6th Cycle Housing Element RHNA allocation (i.e., October 2021 through October 2029), with the final allocation anticipated January 2021. In draft, the RHNA allocates over 5,700 DU to Gardena. The City contracted a consultant to update the Housing Element for the 6th Cycle and anticipates its completion by October 2021.

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

1.5 Report Organization

This document is organized into the following sections:

Section 1.0: Introduction provides a Project introduction and overview, cites the CEQA Statute and Guidelines provisions to which the proposed Project is subject, and summarizes the Initial Study's conclusions.

Section 2.0: Project Description details the Project's location, environmental setting, background and history, characteristics, discretionary actions, construction program, phasing, agreements, and required permits and approvals. This Section also identifies the Initial Study's intended uses, including a list of anticipated permits and other approvals.

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

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

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

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2.0 PROJECT DESCRIPTION

2.1 Project Location

The Gardena Transit-Oriented Development Specific Plan ("GTODSP") Project ("Project") would be developed in the City of Gardena ("City"), approximately 8.8 miles southwest of downtown Los Angeles; see **Exhibit 2-1: Regional Vicinity Map**. The Project site is comprised of four lots on one 1.33-acre parcel (APN # 4060-004-039) on Crenshaw Boulevard south of West El Segundo Boulevard, at 12850 - 12900 Crenshaw Boulevard.

2.2 Environmental Setting

Gardena encompasses approximately 6.0 square miles in Los Angeles County's South Bay region. Gardena is a fully urbanized city with of a mix of residential densities, although low-density residential uses predominate. The City also contains a mix of retail commercial, office, and industrial uses. The City of Hawthorne is west of the Project site across Crenshaw Boulevard and north of the Project site across West El Segundo Boulevard; see **Exhibit 2-2: Site Vicinity Map**.

Three major freeways provide regional access to the Project site: Interstate 105 (I-105) to the north, I-110 to the east, and I-405 to the south and west. From I-105, access to the Project site is provided via Crenshaw Boulevard, which runs along the GTODSP area's western boundary. Local access to the GTODSP area is provided via El Segundo Boulevard, which is a six-lane arterial oriented east-west just north of the GTODSP. Local access is also provided via Crenshaw Boulevard, which is a six-lane arterial oriented north-south on the western edge of the Project site.

Transit, bicycle, and pedestrian facilities exist near the GTODSP area. The Crenshaw Station, which is a Los Angeles County Metro Rail freeway median station on the Metro C (Green) Line, is located at Crenshaw Boulevard in the median of the I-105 in the City of Hawthorne, approximately 0.6 miles north of the Project site. Additionally, the GTrans bus route Line 5 runs on El Segundo Boulevard with a stop 125 feet north of the Project site. There is an existing bicycle route along the Laguna Dominguez Trail approximately 60 feet east of the Project site, separated from the Project site by the Dominguez Flood Control Channel. The Laguna Dominguez Trail spans nearly three miles between the cities of Lawndale and Hawthorne. Additionally, sidewalks are provided along Crenshaw Boulevard (fronting the Project site) and within a continuous and complete pedestrian network in the surrounding area. Marked crosswalks are provided on all legs of the nearest intersection (i.e., Crenshaw Boulevard at El Segundo Boulevard).

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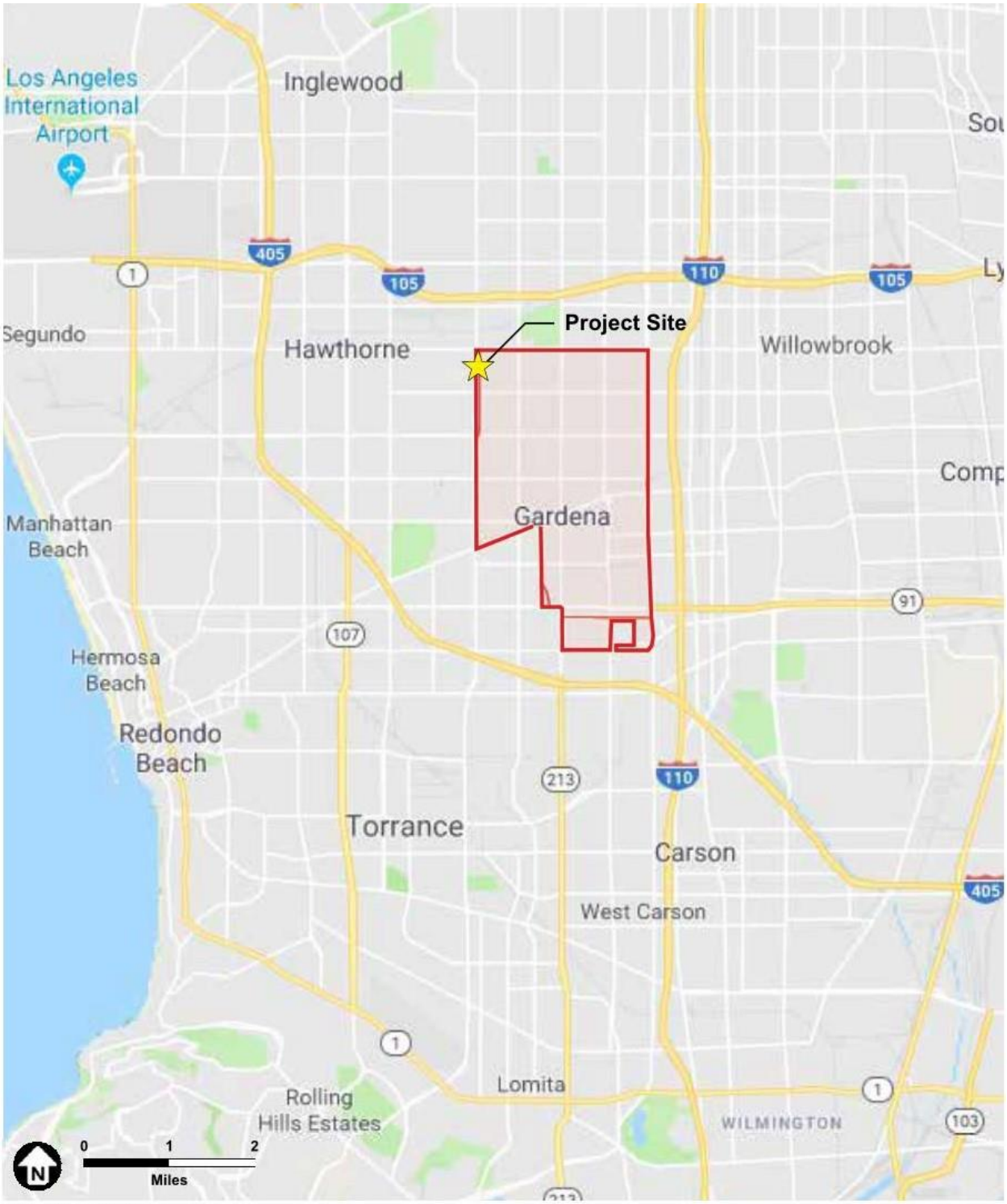

Source: Google Maps

Transit-Oriented Development Specific Plan Project
Environmental Impact Report
Exhibit 2-1
Regional Vicinity Map

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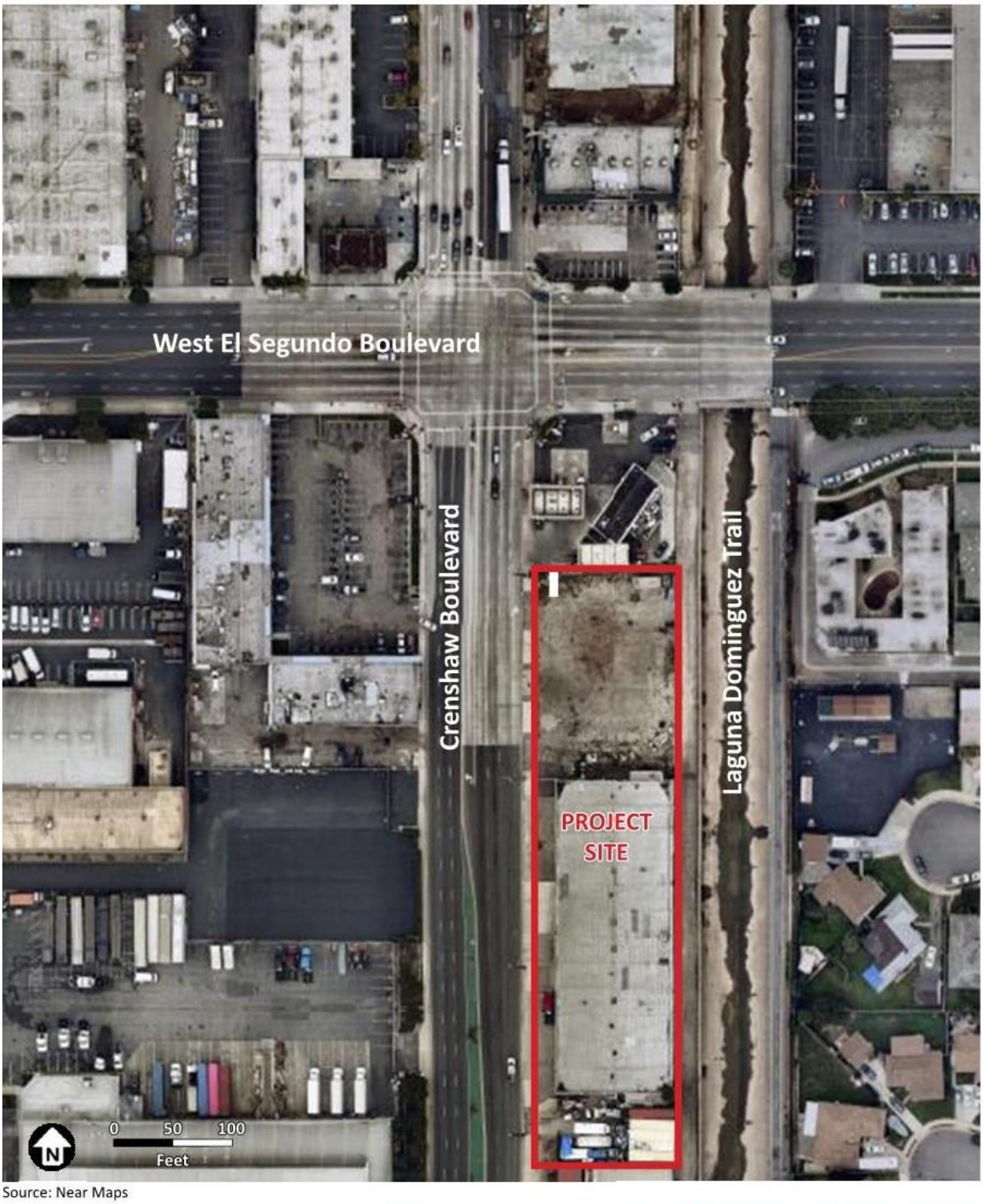

Source: Near Maps

Kimley»Horn

Transit-Oriented Development Specific Plan Project
Environmental Impact Report
Exhibit 2-2
Site Vicinity Map

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2.2.1 On-Site Land Uses

The Project site is part of a larger regional industrial, engineering, commercial, and employment area that generally extends north to south from I-105 to Rosecrans Avenue and east to west from Van Ness Avenue to Prairie Avenue. The Project site is generally bordered by general commercial, logistical, and research and development land uses. The Project site has existed in its current configuration since at least 1958. Uses before 1958 are presently unknown. The Project site is fully developed with one circa 1958, one-story, approximately 24,990-square foot (SF) auto parts warehouse building. Consistent with relevant case law (North County Advocates v. City of Carlsbad (2015)—Cal.App.4th—Case No. D066488), this environmental analysis assumes 100 percent occupancy and includes these vacant use's historical operational information in establishing the environmental baseline for the Project's impact analyses.

2.2.2 Existing General Plan and Zoning

The Gardena General Plan (GGP) designates the Project site as General Commercial, which provides for a wide range of larger-scale commercial uses to serve both the needs of the City and the region.[1] The Zoning Map classifies the Project site as General Commercial Zone (C-3), which is consistent with the GGP. The C-3 Zone is intended for general commercial uses; see Gardena Municipal Code (GMC) Chapter 18:32 - General Commercial Zone (C-3). GMC §18.32.00 identifies the C-3 Zone's permitted uses.

2.2.3 Surrounding Land Uses

The Project site is in the City's northwestern corner in a predominantly industrial and commercial area. Land uses, and corresponding zoning designations, bordering the Project site are depicted on **Exhibit 2-2** and summarized in **Table 2-1: Onsite and Surrounding Land Uses and Zoning**.

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

TABLE 2-1: ONSITE AND SURROUNDING LAND USES AND ZONING		
Description	**Existing On-the-Ground Land Uses**	**Zoning[1]**
Project Site	Approximately 24,990-SF, circa 1958, auto parts warehouse building.	General Commercial Zone (C-3)
North	A gas station is immediately north, adjacent to the Project site. Properties north of West El Segundo Boulevard are in the City of Hawthorne and are predominantly industrial.	Gardena: General Commercial Zone (C-3) Hawthorne: • Northeast: Trucking Intensive Overlay Zone (150 feet north of Project site) and Green Line Mixed Use Specific Plan (250 feet north of Project site) (which can accommodate up to 305 multi-family residential units and 11,020 SF of supporting commercial) • Northwest: Century Business Center Specific Plan (1,200 feet north of Project site) and the Airport Master Plan (1,800 feet north of Project site)
South	Land uses to the south are primarily commercial and light industrial. Properties south of the Project site are in Gardena, except for a small area of unincorporated Los Angeles County known as Hawthorne Island approximately 700 feet southwest of the Project site.	Gardena: General Commercial Zone (C-3) Hawthorne Island: Two-Family Residence Zone (R-2)
East	Land uses east of Laguna Dominguez Flood Control Channel (Dominguez Channel) and Laguna Dominguez Trail (Dominguez Trail) are residential.	Dominguez Channel and Dominguez Trail: Official Zone (O) East of Dominguez Channel and Dominguez Trail: Low-Density Residential Zone (R-1) and High-Density Multiple-Family Residential Zone (R-4)
West	Land uses to the west are commercial and industrial. Properties west of Crenshaw Boulevard are in the City of Hawthorne.	Hawthorne: General Industrial Zone (M-2) and General Commercial Zone (C-3)

Sources:
1. City of Gardena. (January 2018). *Zoning Map*. Gardena, CA: City of Gardena Planning Division; City of Hawthorne. (April 2019). *Hawthorne, CA Zoning, CA Zoning*; Los Angeles County. (2009). *Z-Net: Find Your Zoning.*
2. ParcelQuest. (March 2020). *Assessor Data*. Retrieved from: https://pqweb.parcelquest.com/#home

2.3 Project Characteristics

2.3.1 Project Overview

The Applicant seeks approval of the GTODSP (SP #1-20) Project. The Project proposes to establish a maximum allowable development within the 1.33-acre GTODSP area of up to 265 dwelling units (DU). The proposed Project components are described below. Because the City does not have any zone which would accommodate this development, the Applicant is proposing the Specific

Plan, which will set the zoning regulations and development standards for this area. In addition to needing a Specific Plan, the Project requires various other approvals; see Section 2.6 below. The approvals are collectively referred to as the "Project."

The GTODSP includes the statutorily required elements, including a land use plan, a circulation plan, a description of existing and proposed utilities and infrastructure, design guidelines, development standards, and administrative provisions. For analysis purposes, it is assumed all existing onsite improvements are currently 100 percent occupied and would be removed and replaced with the proposed residential development. Land Use Plan

The Project would replace the existing auto parts warehouse (approximately 24,990 SF) with an eight-story residential building with up to 265 DUs at a density of 199 DU/acre. The proposed building would have a maximum height of 90 feet, including 5.5 levels of residential development over 2.5 levels of parking; see **Exhibit 2-3: Conceptual Site Plan**.

The Project would also include an approximately 2,500-SF (42' x 60') digital, animating and moving sign on the proposed building's north face, which would be used for offsite commercial advertising, as well as community events. The City would share in a portion of the offsite advertising revenue generated as a community benefit of the Project.

2.3.2 Circulation Plan

The GTODSP includes an infrastructure and access plan for various travel modes including automobiles, transit, bicycles, and pedestrians, as described below.

Improvements

The GTODSP includes vehicular and nonvehicular circulation improvements to the GTODSP area to connect to existing offsite transportation facilities. Specifically, the Project proposes to:

- Replace the existing auto parts warehouse and surface parking lots that include six curb cuts that interrupt the sidewalk with a single right-in/right-out vehicle access point to the proposed residential building.
- Provide pedestrian access to the Project site on the ground floor with primary pedestrian access located at the building lobby on the Project site's northern portion. Additional restricted pedestrian access would also be provided at the Project site's southern portion and via the parking garage.
- Provide secured bicycle storage in the enclosed garage, one bicycle parking space for every two residential units. Adjacent bicycle access between the Project site and the Laguna Dominguez Trail would be provided via West El Segundo Boulevard, just north of the Project site.
- Implement transportation demand management (TDM) strategies to advance the GTODSP's vision for multi-modal transportation. The Project would integrate TDM measures to reduce single-occupant automobile travel and take advantage of the GTODSP's proximity to large employment centers, transit services, and bicycle and pedestrian facilities, as described above.

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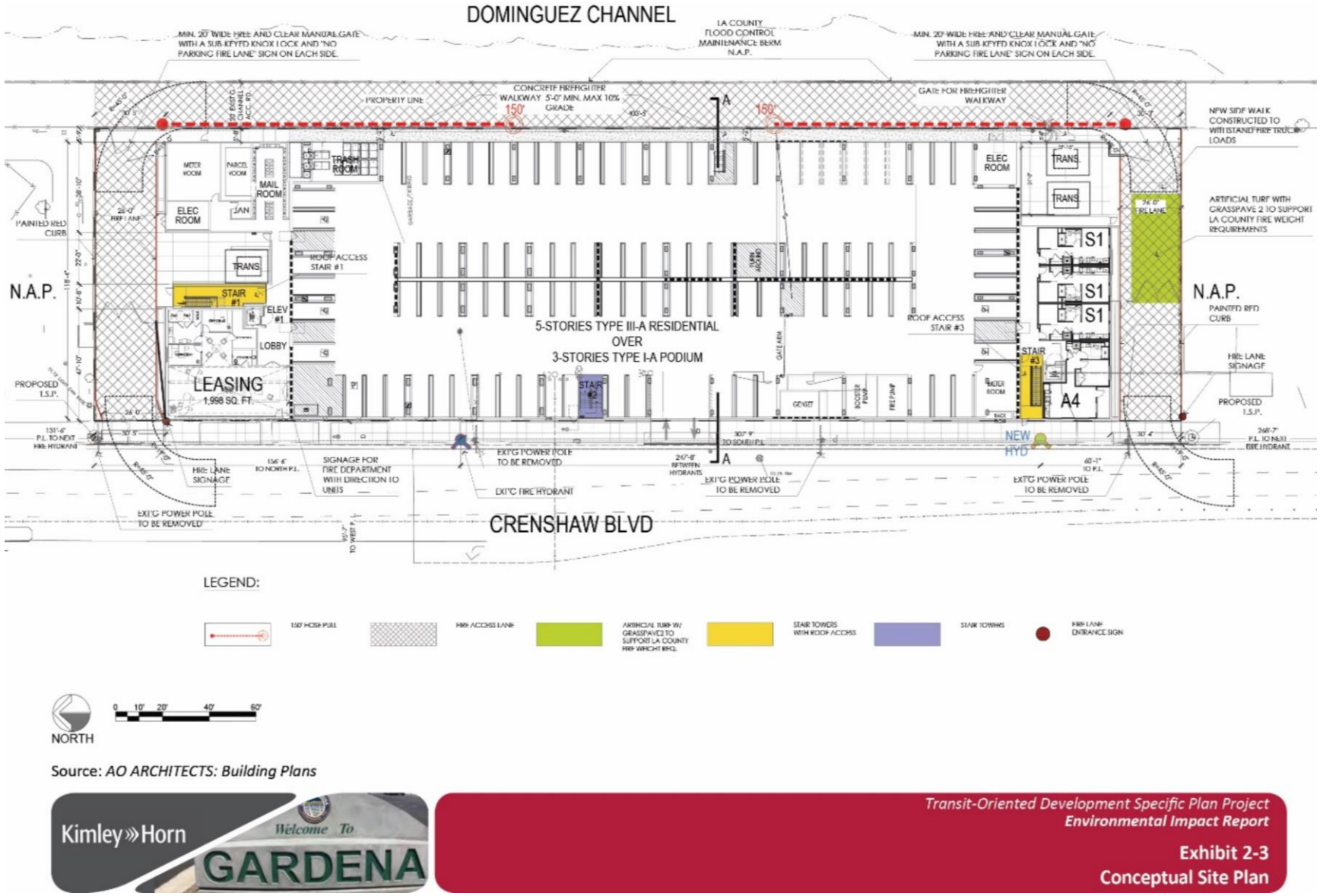

Source: *AO ARCHITECTS: Building Plans*

Transit-Oriented Development Specific Plan Project
Environmental Impact Report

Exhibit 2-3
Conceptual Site Plan

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Parking

Onsite parking would be provided in an enclosed garage in the lower 2.5 floors. The Project would provide a total of 267 parking spaces within the parking garage. Parking spaces would be unbundled from the rental of the residential units to encourage alternate modes of transportation.

2.3.3 Utilities and Infrastructure

The utilities and infrastructure proposed in the GTODSP area are potable and reclaimed water, sewer, stormwater drainage and water treatment, electricity, natural gas, and telecommunications. The GTODSP includes the distribution, location, extent of major components of public and private utilities and infrastructure, and other essential facilities within the GTODSP area that are needed to support the proposed residential development.

2.3.4 Design Guidelines

Land uses within the GTODSP area would be required to conform to the GTODSP development regulations and requirements, which detail permitted uses within the GTODSP, lot area requirements, maximum building height, FAR, DU site, and setbacks. Additional standards are provided for required common open space; vehicle and bicycle parking; passenger loading zones; and on-site accessory structures including walls, fences, and landscaping.

2.3.5 Development Standards

The GTODSP specifies the standards which development in the GTODSP area would be subject to. These standards (which are intended to replace the existing zoning regulations) address various aspects of development, including the following:

- Permitted uses
- Development standards (e.g., lot area, height, setbacks, lot frontage, floor area/floor area ratio, walls/fences, and accessory structures)
- Circulation
- Landscaping
- Public safety (Lighting)
- Signage

Permitted Uses

A project in the GTODSP area would only be occupied by land uses identified in the GTODSP and would be subject to the applicable City approval process. The following uses would be permitted in the GTODSP area:

- Multi-family housing.
- Short-term corporate housing (leases of 30 days or less) within up to 10 percent of the DU at any given time.

- Residential amenities and ancillary uses and any use customarily incidental to a permitted use, including home occupations.
- Digital, animated and moving signage for off-site advertising purposes not to exceed 2,505 SF in size.
- Any other use not specifically listed here determined by the City to be similar to a permitted use.

Any use not listed as a permitted use, and not found to be sufficiently similar to a permitted use by the City, would be prohibited.

2.3.6 Administration

The program of implementation necessary to carry out the land use plan, utilities/infrastructure, and development standards described above is addressed through the GTODSP's administration requirements, which address the GMC, GTODSP modifications, site plan review, GTODSP amendments, and CEQA compliance.

2.4 Project Construction Activities and Phasing

Project construction is anticipated to occur as a single phase. Phased occupancy of the proposed Project is permitted. A Temporary Certificate of Occupancy may be issued pending clearance of certain final Project conditions of approval, subject to City approval. For purposes of this environmental analysis, opening year is assumed to be 2023.

Project construction is anticipated to start June 2021 and be completed September 2023. Project construction would occur in the following sequence:

- Demolition (1.5 months);
- Site preparation (0.5 month);
- Foundations (1.5 months)
- Vertical concrete (6.5 months)
- Wood framing and exterior façade (13 months); and
- Finishes to completion (4 months).

Grading for the proposed improvements would require cut and fill. The Project site would be graded to mimic the existing grading and drainage patterns. The overall site grading and drainage pattern would be westerly towards Crenshaw Boulevard. Project grading is estimated to result in approximately 8,000 cubic yards of export.

2.5 Agreements, Permits, and Approvals

The City, as Lead Agency for the Project, has discretionary authority over the Project. In order to implement the Project, the Applicant would need to obtain, at a minimum, the following discretionary permits/approvals:

- General Plan/General Plan Map Amendment (GPA #1-20): A general plan amendment to: (i) change the land use designation on the General Plan Land Use Map from "General Commercial" to "Gardena TOD Specific Plan" and (ii) amend the Land Use Element text and Land Use Element Table LU-3 to allow the mix of uses and densities specified in the GTODSP;
- Zone Change and Zone Map Amendment (ZC #1-20): A zoning map amendment to: (i) replace the existing General Commercial (C3) zoning with the Gardena Transit Oriented Development Specific Plan zone and (ii) amend the GMC text to add this new zone and to allow for digital signage to be developed in the City when they are an allowed use in the zone and subject to a development agreement with the City which provides a public benefit;
- Zoning Code Amendment (ZCA #3-20);
- Gardena Transit-Oriented Development Specific Plan (GTODSP) (SP #1-20);
- Development Agreement (DA #1-20): The development agreement will guarantee that the Specific Plan's terms will not be amended for a set period of years without the Developer's consent and will guarantee the City a certain amount of income for a set period of time;
- Lot Line Adjustment/Merger (LLA #1-20): A lot merger to merge the Project site's four legal lots into a single development site in accordance with GMC §17.08.250;
- Site Plan Review (SPR #1-20): Review of the physical design of the development; and
- Environmental Assessment (EA #1-20).

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3.0 ENVIRONMENTAL CHECKLIST FORM

3.1 Background

1.	**Project Title:** Gardena Transit-Oriented Development Specific Plan Project
2.	**Lead Agency Name and Address:** City of Gardena Community Development Department 1700 West 162nd Street Gardena, California 90247
3.	**Contact Person and Phone Number:** John F. Signo, AICP, Senior Planner Tel: 310.217.9530 Email: jsigno@cityofgardena.org
4.	**Project Location:** County of Los Angeles, City of Gardena, at 12850 Crenshaw Boulevard
5.	**Project Sponsor's Name and Address:** Josh Vasbinder Din/Cal 4, Inc. 1010 South Coast Highway, Suite 106 Encinitas, California 92024
6.	**General Plan Designation:** General Commercial
7.	**Zoning:** General Commercial Zone (C-3)
8.	**Description of Project:** See **Section 2.4: Project Characteristics**
9.	**Surrounding Land Uses and Setting:** See **Section 2.2.3: Surrounding Land Uses**
10.	**Other public agencies whose approval is required (e.g., permits).** To be determined, as part of EIR completion.
11.	**Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?** Consultation with one California Native American tribe (Kizh Nation) was initiated on July 6, 2020; see also **Section 4.18: Tribal Cultural Resources**.

3.2 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the proposed Project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

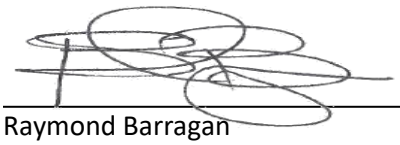
X	Aesthetics		Agricultural and Forestry Resources	X	Air Quality
	Biological Resources	X	Cultural Resources	X	Energy
X	Geology and Soils	X	Greenhouse Gas Emissions	X	Hazards and Hazardous Materials
X	Hydrology and Water Quality	X	Land Use and Planning		Mineral Resources
X	Noise	X	Population and Housing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

3.3 Lead Agency Determination

On the basis of this initial evaluation:

I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed Project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.	X
I find that the proposed Project MAY have a potentially significant or a potentially significant unless mitigated impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.	

CITY OF GARDENA



Raymond Barragan
Acting Community Development Director

August 18, 2020
Date

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4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

The following environmental analysis is patterned after State CEQA Guidelines **Appendix G.** An explanation is provided for all responses except "No Impact" responses, which are supported by the cited information sources. The responses consider the whole action involved with the proposed Project: on- and off-site, Project- and cumulative-level, direct and indirect, and short-term construction and long-term operational. The explanation of each issue also identifies the significance criteria or threshold, if any, used to evaluate each question, and the mitigation identified, if any, to avoid or reduce the impact to less than significant. To each question, there are four possible responses:

- **No Impact.** The Project would not have any measurable environmental impact.
- **Less Than Significant Impact.** The Project would have the potential to impact the environment, although this impact would be below-established thresholds that are considered to be significant.
- **Less Than Significant With Mitigation Incorporated.** The Project would have the potential to generate impacts, which may be considered as a significant effect on the environment, although mitigation measures or changes to the Project's physical or operational characteristics could reduce these impacts to a less than significant level.
- **Potentially Significant Impact.** The Project could have impacts, which may be considered significant, and therefore additional analysis is required to identify mitigation. A determination that there is a potential for significant effects indicates the need to more fully analyze the Project's impacts and identify mitigation.

4.1 Aesthetics

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code §21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?				X
c) If in a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	X			
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	X			

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 GTODSP area lies within a Transit Priority Area. Based on this, the only part of the Project that is evaluated under the aesthetics section is the digital billboard being proposed on the north side of the building.

IMPACT ANALYSIS

4.1a Would the project have a substantial adverse effect on a scenic vista?

No Impact. Under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly-valued landscape for the public's benefit. No such conditions exist on or near the Project site. Additionally, the GGP does not specifically address scenic vistas. Therefore, the Project would not have an adverse effect on a scenic vista. This issue will not be further analyzed in the EIR.

4.1b Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?

No Impact. The area surrounding the Project site is predominately developed, with no natural landforms or scenic features present. There are no State- or County-designated scenic highways

in the Project site vicinity.[2] Therefore, the Project would not damage scenic resources within a state scenic highway. This issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. The Project site is in urbanized area. The Project site is fully developed with an approximately 24,990-SF, circa 1958 auto parts warehouse building. The Project site is in the City's northwestern portion, in a predominantly commercial and industrial area, although residential uses exist to the east. The Project site is bounded by commercial and industrial uses to the north, commercial uses to the south, residential uses to the east, and commercial and industrial uses to the west. Uses to the north, across El Segundo Boulevard, and to the west, across Crenshaw Boulevard, are within the city of Hawthorne. The Project proposes to remove all existing on-site improvements, and construct a single building of up to 265 DU. The maximum proposed building height would be eight stories or 90 feet (to top of elevator tower). Non-habitable projections (e.g., architectural features, mechanical equipment, and stairwells) may extend up to 10 feet above the maximum building height to 100 feet.

The on-site and abutting/surrounding zoning and the Gardena Municipal Code (GMC) and Hawthorne Municipal Code (HMC) regulations pertaining to each zone are detailed in **Table 2-1: Onsite and Surrounding Land Uses and Zoning**.

The regulations specified in **Table 2-1** do not include standards governing scenic quality. Additionally, the GMC does not include other regulations governing scenic quality. However, the Project proposes a digital billboard that would require a Municipal Code amendment given it is City policy to completely prohibit the construction, erection, or use of any billboards. Therefore, the Project could conflict with applicable zoning or other regulations governing scenic quality. This issue will be further analyzed in the EIR. It is noted, except concerning the digital billboard, the Project would not require an analysis of potential impacts concerning scenic quality.

4.1d Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Potentially Significant Impact. The proposed Project would generate lighting from three primary sources: lighting from building interiors that would pass through windows; lighting from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting); and lighting from the proposed digital billboard. Therefore, the EIR will further evaluate the Project's potential to create a new source of substantial light or glare, which would adversely affect the area's day or nighttime views. It is noted, except concerning the digital billboard, the Project would not require an analysis of potential impacts concerning light and glare.

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

4.2 Agricultural and Forestry Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

IMPACT ANALYSIS

4.2a Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

4.2b Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

4.2c Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?

4.2d Would the project result in the loss of forest land or conversion of forest land to non-forest use?

4.2e Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. No Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance is mapped in Gardena or Hawthorne.[3] Further, the Project site is not the subject of a Williamson Act Contract.[4] The Project site is zoned C-3.[5] No agricultural, forest land, or timberland zoning exists in Gardena or Hawthorne. Two parcels zoned Horticulture are 0.5 mile west of the Project site, however, the Project would not convert these parcels to a non-agricultural use directly or indirectly since the parcels are already used as an elementary school (Kornblum School). Therefore, the Project would result in no impact concerning mapped farmlands, Williamson Act contracts, or agricultural, forest, or timber land zoning.

The Project site is fully developed with an approximately 24,990-SF auto parts warehouse. No farmland, forest land, or timberland exist in the City. Therefore, the Project would not result in the conversion or loss of Farmland, forest land or timberland. These issues will not be further analyzed in the EIR.

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

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

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

4.3 Air Quality

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	X			
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	X			
c) Expose sensitive receptors to substantial pollutant concentrations?	X			
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	X			

The Project site is within the South Coast Air Basin (SCAB), which is under the South Coast Air Quality Management District's (South Coast AQMD) jurisdiction. The South Coast AQMD significance criteria may be relied upon to make the above determinations. According to the South Coast AQMD, 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 South Coast AQMD has established thresholds of significance for air quality during project construction and operations.

The proposed Project would also be subject to ambient air quality standards. These are addressed through an analysis of localized CO impacts.

In addition to the CO hotspot analysis, the South Coast AQMD developed Local Significance Thresholds ("LSTs") for emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at new development sites. LST analysis for construction is applicable for all projects that disturb 5.0 acres or less on a single day.

IMPACT ANALYSIS

4.3a Would the project conflict with or obstruct implementation of the applicable air quality plan?

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

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

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

Potentially Significant Impact. The South Coast AQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce criteria pollutant emissions for which SCAB is in non-attainment. The Project proposes to construct up to 265 DUs on the Project site, generating construction traffic for material and construction worker trips. During operations, DUs would generate vehicle trips and the Project would have intermittent deliveries. Project construction activities would generate short-term criteria air pollutant emissions. The Project's operational emissions would be associated with area sources, energy sources, and mobile sources. Project construction and operations could result in the release of air contaminants and other adverse impacts, including odors. Therefore, the EIR will further evaluate these potential impacts.

4.4 Biological Resources

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

IMPACT ANALYSIS

4.4a Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

4.4b Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

4.4c Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project site is fully developed with an approximately 24,990-SF auto parts warehouse. No natural habitats are present onsite. The Project site is bounded by commercial and industrial uses to the north, commercial uses to the south, residential uses to the east, and commercial and industrial uses to the west. No natural habitats are present on these areas abutting uses, and only landscaping (i.e., ornamental vegetation) is present. Based on review of the existing and abutting site conditions, no candidate, sensitive, or special-status plant or wildlife species, riparian habitat or other sensitive natural community, or wetlands are present on or adjacent to the Project site. Therefore, the Project would not have an adverse effect on any candidate, sensitive, or special-status plant or wildlife species, riparian habitat or other sensitive natural community, or wetlands. These issues will not be further analyzed in the EIR.

4.4d Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. Corridors are linear linkages between two or more habitat patches, which provide for wildlife movement and dispersal. The Project site is fully developed and no natural habitats are present on site. The Project site is also bounded by commercial, industrial, and residential uses. No natural habitats are present on these abutting areas, and only landscaping (i.e., ornamental vegetation) is present. The Dominguez Channel is located immediately east of the Project site.

There are no established wildlife movement corridors that traverse the Project site or within this segment of the Dominguez Channel, as described within the Los Angeles County General Plan.[6] This drainage is concrete-lined, thus, its habitat values in this urban area are low. Although the Channel does not necessarily include habitat capable of supporting all requirements of a species, it could be used for wildlife movement. However, because Project construction activities would occur entirely onsite and would be restricted to daytime hours, in accordance with the GMC, the Project's potential impacts concerning interference with an established wildlife movement would be less than significant. This issue will not be further analyzed in the EIR.

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

No Impact. GMC §13.60.080: Permit, requires a Trimming Permit, Tree Removal Permit, and/or a Tree Planting Permit for cutting, trimming, pruning, planting, removing, injuring or interfering with any tree, shrub or plant upon any Street or Public Place of the City. The proposed Project would be developed on private property and no tree trimming or tree removal within any of the City's Streets or Public Places would occur as a result of Project construction. Therefore, the

[6] Environmental Sciences Associates, *LA County Flood Control District Enhanced Watershed Management Programs Draft Program Environmental Impact Report*, January 2015.

Project would not conflict with GMC §13.60.080. This issue will not be further analyzed in the EIR.

4.4f Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the Project would not result in conflicts with such plans. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

4.5 Cultural Resources

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

IMPACT ANALYSIS

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

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

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

Potentially Significant Impact. The existing onsite building was constructed circa 1958.[7] The existing building is over 50 years old and therefore is potentially a historical resource. Past development has previously disturbed the Project site; thus, the Project site is considered to have low archaeological sensitivity. No dedicated cemeteries are on or near the Project site. The Project site is not near known archaeological resources. Given the extent of onsite ground disturbances from previous development and the area's urbanized nature, there is low potential for the Project's ground-disturbing activities to encounter archaeological resources or human remains. Notwithstanding, the potential exists for accidental discovery of archaeological resources or human remains during ground-disturbing activities. The EIR will further evaluate these potential impacts.

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

4.6 Energy

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

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

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

IMPACT ANALYSIS

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

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

Potentially Significant Impact. Southern California Edison (SCE) provides electricity to the Project area. Southern California Gas Company (SoCalGas) provides natural gas service to the Project area. During Project construction, transportation fuel use would depend on the type and number of trips, vehicle miles traveled (VMT), fuel efficiency of vehicles, and travel mode. During Project

operations, residential energy consumption of fuel would be associated with resident and guest vehicle trips, delivery truck trips, and maintenance and repair crew trips.

The Project's energy demand is expected to be served by existing utility facilities described above. The Project's construction-related and operation-related electrical, gas, and fuel demand, as well as consistency with state and local plans for renewable energy and energy efficiency, will be evaluated in the EIR.

4.7 Geology and Soils

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

IMPACT ANALYSIS

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

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo (AP) Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). The Project site is not located within an Alquist-Priolo Earthquake Fault Zone.[8] Additionally, no evidence exists of a known fault within or adjacent to the Project site. The Project would not expose people or structures to adverse effects involving rupture of a known earthquake fault. Therefore, no impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The City is located between several active fault zones including the Newport-Inglewood-Rose Canyon Fault Zone, Puente Hills (LA), and Palos Verdes Fault.[9] The zoned fault nearest the Project site is the Newport-Inglewood Fault Zone, located approximately 1.65 miles to the east. The Project site is in an area of high regional seismicity. Ground shaking originating from earthquakes along active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. The region has experienced shaking from several earthquakes recorded back to 1812. The nearest large historic earthquake is the 1941 Torrance-Gardena Earthquake, with an epicenter approximately 4.7 miles southeast of the Project site.[10] Historic earthquakes with magnitudes of greater than or equal to 6.0 and have been epicentered within approximately 32 miles of the Project site.

The faults described above could cause moderate to intense ground shaking during the Project's lifetime. Additionally, the Project site has experienced earthquake-induced ground shaking in the past and can be expected to experience further shaking in the future. Therefore, Project implementation could expose people and structures to potential adverse effects involving strong seismic ground shaking. The intensity of ground shaking on the Project site would depend upon

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

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

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

the earthquake's magnitude, distance to the epicenter, and geology of the area between the Project site and epicenter. Regulatory controls to address potential seismic hazards would be imposed on the Project through the permitting process. Pursuant to GMC Chapter 15.04: General Building Provisions, the City has adopted the 2019 California Building Standards Code (CBSC), subject to certain amendments and changes, including those that address seismic resistance. CBSC design standards correspond to the level of seismic risk in a given location and are intended primarily to protect public safety and secondly to minimize property damage. The Project would be subject to compliance with all applicable regulations in the most recently published CBSC (as amended by GMC Chapter 15.04), which specifies design requirements to mitigate the effects of potential earthquake hazards. Moreover, the *Geotechnical Engineering Investigation Proposed Residential Complex* (Geotechnical Investigation) (Geotechnologies, Inc., Revised May 22, 2020) evaluate various geologic and seismic hazards based on site-specific parameters, including strong seismic ground shaking shrinkage, and subsidence). The Geotechnical Investigation *Conclusions and Recommendations* section makes recommendations concerning seismic design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Geotechnical Investigation concludes Project construction is feasible from a geotechnical standpoint provided the Investigation's recommendations are followed and implemented during construction. A COA will be imposed on the Project requiring that the Applicant submit the Final Geotechnical Investigation for City review/approval and comply with its recommendations and any revisions deemed necessary by the City's Building Official. The Gardena Building Services Division would review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Geotechnical Investigation's recommendations. Following compliance with standard engineering practices, the established regulatory framework (i.e., GMC and CBSC), and the Geotechnical Investigation's recommendations, the Project's potential impacts concerning exposure of people or structures to potential adverse effects involving strong seismic ground shaking would be less than significant. This issue will not be further analyzed in the EIR.

4.7aiii Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. For liquefaction to occur, three criteria must be met: underlying loose, coarse-grained (sandy) soils, a groundwater depth of approximately 25 feet, and a potential for seismic shaking from nearby large-magnitude earthquakes. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

The Seismic Hazards Maps of the Inglewood Quadrangle by the State of California (CDMG, 1999), does not classify the Project site as part of the potentially "Liquefiable" area. This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake.

As part of the Geotechnical Investigation, a site-specific liquefaction analysis was performed following the *Recommended Procedures for Implementation of the California Geologic Survey Special Publication 117A, Guidelines for Analyzing and Mitigating Seismic Hazards in California*, and the EERI Monograph by Idriss and Boulanger. The liquefaction analysis indicated that the underlying soils would not be capable of liquefaction during the Maximum Considered Earthquake ground motion, as set forth by ASCE 7-16 Standards and the most recent California Building Code. Therefore, the Project's potential impacts concerning exposure of people or structures to potential adverse effects involving liquefaction would be less than significant. Further, as discussed in Response 4.7aii, the Gardena Building Services Division would review construction plans to verify compliance with standard engineering practices, the GMC/CBSC and the Geotechnical Investigation's recommendations. Following compliance with standard engineering practices, the established regulatory framework (i.e., GMC and CBSC), and the Geotechnical Investigation's recommendations, the Project's potential impacts involving adverse effects associated with seismic-related ground failure, including liquefaction, would be less than significant. This issue will not be further analyzed in the EIR.

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

No Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. According to the California Geological Survey's Earthquake Zones of Required Investigation Inglewood Quadrangle Map, the Project site does not lie in a landslide hazard zone.[11] Since the site is relatively flat and not within a landslide hazard zone, no potential for earthquake-induced land sliding would occur. Therefore, the Project would not directly or indirectly cause potential adverse effects involving landslides. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The Project site is relatively flat, and its geology is composed of fill materials and native alluvial soils. Fill materials were encountered in all exploratory excavations, to depths ranging between 2½ and 3 feet below the existing site grade. The fill consists of silty to clayey sand, sandy clay, and sandy silt, which are brown to dark brown in color, moist, medium dense and firm to stiff, fine to medium-grained, with variable amounts of gravel and construction debris fragments. The fill is underlain by native alluvial soils, consisting of sandy to clayey silts, sandy to silty clays, and silty to clayey sands and sands. The native alluvial soils range from light brown to dark brown and olive-brown to grayish dark brown in color, slightly moist to wet, medium dense to very dense, stiff to very stiff, and fine to medium-grained, with variable amounts of gravel.

Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. During construction, the Project would be subject to compliance with GMC §8.70.110.B.1: Development Construction, erosion and siltation control measures and the

[11] Ibid.

National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, and all subsequent amendments) (Construction General Permit); see Response 4.9a, which specifies that no Grading Permit shall be issued to construction projects that disturb 1.0 or more acres of soil without obtaining a *General Construction Activity Stormwater Permit* (GCASWP) from the State Water Resources Control Board. Following compliance with the established regulatory framework (i.e., the GMC and Construction General Permit), the Project's potential impacts concerning soil erosion and loss of topsoil would be less than significant. This issue will not be further analyzed in the EIR.

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

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

Less Than Significant Impact. The Project site would not be subject to seismically-induced liquefaction or lateral spreading (see Response 4.7aiii) or landslides (see Response 4.7aiv). The Geotechnical Investigation did not identify any potential for subsidence or collapse, and concluded that the calculated settlements are expected to be within the tolerance of structures designed based on modern building codes. The Geotechnical Investigation also concluded onsite geologic materials are in the very low to low expansion range. The Expansion Index was found to be 10 and 28 for representative remolded bulk samples. The Geotechnical Investigation includes recommended reinforcing as detailed in the *Foundation Design* and *Slabs-On-Grade* sections. As discussed in Response 4.7aii, the Geotechnical Investigation makes recommendations concerning design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Gardena Building Services Division would review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Geotechnical Investigation's recommendations, including those concerning expansive soils. Following compliance with standard engineering practices, the established regulatory framework (i.e., GMC and CBSC), and the Geotechnical Investigation's recommendations, the Project would not create substantial direct or indirect risks to life or property concerning expansive soils. Therefore, impacts would be less than significant in this regard. These issues will not be further analyzed in the EIR.

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

No Impact. Sewers would be available for disposal of Project-generated wastewater; see Responses 4.19aii and 4.19aiii. The Project would not utilize septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur in this regard. This issue will not be further analyzed in the EIR.

4.7f Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These resources are valued for the information they yield about the earth's history and its past ecological settings. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area. Previous construction-related excavation on the Project site has disturbed sediments beyond depths at which buried prehistoric cultural resources are likely. Notwithstanding, the potential exists for accidental discovery of paleontological resources during ground-disturbing activities. The EIR will further evaluate these potential impacts.

4.8 Greenhouse Gas Emissions

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

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

IMPACT ANALYSIS

4.8a Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. The proposed Project would generate greenhouse gas (GHG) emissions directly from construction-related activities. Construction GHG emissions are typically summed and amortized over the Project's lifetime (assumed to be 30 years), then added to the operational emissions.[12] The EIR will further evaluate the Project's amortized emissions.

Operational or long-term emissions would occur over the proposed Project's life. The Project's operational GHG emissions would result from direct emissions such as Project-generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to the Project site and wastewater from the Project site, the emissions associated with solid waste generated from the Project site, and any fugitive refrigerants from air conditioning or refrigerators. The EIR will further evaluate the Project's operational emissions.

[12] The Project lifetime is based on South Coast AQMD'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).

4.8b Would the project conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. The EIR will further evaluate the proposed Project's consistency with EECAP goals, measures, and emission reduction targets and potential to conflict with any applicable plan, policy, or regulation of an agency adopted to reduce GHG emissions, including Title 24, AB 32, and SB 32.

4.9 Hazards and Hazardous Materials

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	X			
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	X			
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	X			
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	X			
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	X			
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	X			
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

IMPACT ANALYSIS

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

Potentially Significant Impact. Project construction and operation would involve the transport, storage, use and/or disposal of limited quantities of hazardous materials, such as fuels, solvents, degreasers and paints. Examples of such activities include fueling and servicing construction equipment, and applying paints and other coatings. The Project proposes a residential development. The maintenance materials would be stored, handled, and disposed of in accordance with applicable regulations. These are not anticipated to involve the routine

transport, use, or disposal of quantities of hazardous materials that may create a significant hazard to the public or environment.

The EIR will further evaluate the Project's potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

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

Potentially Significant Impact. Project construction would include demolition of all structures and complete over-excavation and re-compaction of soils, which could be contaminated. The EIR will further evaluate the Project's potential to 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.

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

Potentially Significant Impact. The Project could involve the use of small quantities of potentially hazardous materials near schools such as fuels, solvents, degreasers and paints during construction, and small amounts of commercially available janitorial and landscaping supplies during operation.

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

Potentially Significant Impact. Government Code §65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the DTSC. The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination, sites with known underground storage tanks (USTs) having a reportable release, solid waste disposal facilities from which there is a known migration, hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program. A regulatory agency database search will be conducted as part of the EIR to determine whether the Project would be located on a site, which is included on a list of hazardous materials sites.

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

Potentially Significant Impact. The airport located nearest the Project site is Hawthorne Municipal Airport/Jack Northrop Field ("Airport"), approximately 0.45 mile to the north. The EIR will further evaluate whether the Project is within an airport land use plan and its potential to result in a safety hazard or excessive noise for people residing or working in the Project area.

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

Potentially Significant Impact. The Project Site is located in an area where adequate circulation and access is provided to facilitate emergency response. The EIR will research the nearest emergency route to the Project Site. Notwithstanding, the Project could interfere with an emergency response plan or emergency evacuation plan. Therefore, the EIR will further evaluate these potential impacts.

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

No Impact. The Project site is in a fully urbanized area and it is not adjacent to any wildland. Therefore, the Project would not expose people or structures to a risk involving wildland fires. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

4.10 Hydrology and Water Quality

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

IMPACT ANALYSIS

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

Potentially Significant Impact. The Project's construction-related activities would include excavation, grading, and trenching, which would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. The potential for the Project's construction-related activities to violate water quality standards or otherwise substantially degrade surface or groundwater quality will be further evaluated in the EIR.

The EIR will further evaluate the potential for Project operations to violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

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

Potentially Significant Impact. The Project site is in Golden State Water Company's (GSWC's) service area, and specifically, within the Southwest System service area, which serves Gardena, seven other cities, and portions of unincorporated Los Angeles County. Water supply sources for the Southwest System are imported water, GSWC operated groundwater wells, and recycled water. Refer to Response 4.10e concerning sustainable groundwater management.

Basin recharge occurs through percolation of precipitation and artificial recharge activities at spreading grounds, among other sources. The Project site was previously developed. However, the Project could increase the site's impervious area, as compared to pre-Project conditions, which could reduce the surface area available for groundwater recharge through percolation. The EIR will further evaluate the Project's potential to deplete groundwater supplies or interfere substantially with groundwater recharge.

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

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

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

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

(iv) Impede or redirect flood flows?

Potentially Significant Impact. As part of the EIR, a Hydrology Study will be prepared to determine the amount of stormwater runoff generated from the Project site in the existing and proposed conditions. The Hydrology Study will also determine the drainage (e.g., detention basins) and water quality facilities that would be required for peak storm events.

The EIR will further study the Project's potential to alter the site's existing drainage pattern or add impervious surfaces, such that it would substantially increase the rate or amount of surface runoff in a manner which would result in flooding, create/contribute runoff, which would exceed the capacity of existing drainage system, or impede/redirect flood flows. Refer to Response 4.10a concerning potential impacts involving erosion.

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

Less Than Significant Impact. The Project site is in an area of minimal flood hazard.[13] Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. The Project site is approximately eight miles east of the Pacific Ocean and there are no nearby bodies of standing water. Tsunamis and seiches do not pose hazards due to the Project site's inland location and lack of nearby bodies of standing water. The Project proposes a residential development that would involve the use of materials associated with routine property maintenance, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. The Project is not within a flood hazard, tsunami, or seiche zone and would not risk the release of pollutants. Therefore, potential impacts associated with inundation by flood hazard, tsunami, or seiche would be less than significant. This issue will not be further analyzed in the EIR.

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

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

In 2014, the California Sustainable Groundwater Management Act (SGMA) was passed, which provides authority for agencies to develop and implement groundwater sustainability plans (GSP) or alternative plans that demonstrate water basins are being managed sustainably.[14] Under the SGMA, the Central Basin and West Coast Basin are exempted from the requirement to form a Groundwater Sustainability Agency, since they are adjudicated basins.

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

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

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

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

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

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

SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The latest basin prioritization project, SGMA 2019 Basin Prioritization, was completed in December 2019. SGMA 2019 Basin Prioritization identified 94 basins/sub-basins as medium or high priority. The Project site is located in a low priority basin.[15] Additionally, the Southwest System's water use in 2015 (most recent UWMP) was 87 GPCD, well below the SBX7-7 2020 target of 121 GPCD. Further, the City would continue to comply with SBx7-7 requirements. Therefore, the Project would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less than significant in this regard. This issue will not be further analyzed in the EIR.

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

4.11 Land Use Planning

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	X			

IMPACT ANALYSIS

4.11a Would the project physically divide an established community?

No Impact. Examples of projects that could physically divide an established community include a new freeway or highway that traverse an established neighborhood. The Project proposes a TOD development consisting of up to 265 DUs. The Project replaces the existing industrial use and does not propose any new streets or other physical barriers, which could physically divide an established community. Given its nature and scope, the Project would not physically divide an established community. Therefore, no impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. GGP Figure LU-2, *Land Use Policy Map*, depicts the City's land use designations and indicates the Project site is designated General Commercial.[16] The General Commercial designation provides for a wide range of larger-scale commercial uses to serve both the needs of the City and the region.[17] The Project would replace the existing designation with a Specific Plan designation and proposes up to 265 DUs, consistent with the Specific Plan. The EIR will further evaluate the Project's potential to conflict with the General Commercial designation's primary intended uses and maximum allowed density.

The City of Gardena Zoning Map depicts the City's zones and indicates the Project site is zoned C-3 Zone.[18] The C-3 Zone is intended for general commercial use. The Project proposes residential land uses and a Specific Plan. The EIR will further evaluate the Project's potential to conflict with the GMC.

[16] City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006*. Figure LU-2: 2013 General Plan Land Use Policy Map. Gardena, CA: City of Gardena.
[17] City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006*. Page LU-12. Gardena, CA: City of Gardena.
[18] City of Gardena. (January 2018). *Zoning Map*. Gardena, CA: City of Gardena Planning Division.

4.12 Mineral Resources

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

IMPACT ANALYSIS

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

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

No Impact. The Surface Mining and Reclamation Act of 1975 (SMARA) requires classification of land into mineral resource zones (MRZs) according to the area's known or inferred mineral potential.[19] The Project site is located in Mineral Resource Zone-1 (MRZ-1). Areas designated MRZ-1 are noted to have adequate information that no significant[20] mineral deposits are present or it is judged that little likelihood exists for their presence.[21] Further, the GGP does not identify the Project site as a locally-important mineral resource recovery site. Therefore, the proposed Project would have no impact concerning mineral resources. These issues will not be further analyzed in the EIR.

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

[20] Note that use of the term "significant" in this context is used in the MRZ definitions of zones to describe economic value of mineral resources and does not refer to a level of impact under CEQA.

[21] California Department of Conservation. (2015). *CGS Information Warehouse: Regulatory Maps. Special Report 143, Plate 4-1.* Retrieved from http://maps.conservation.ca.gov/cgs/informationwarehouse/.

4.13 Noise

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

The GGP establishes goals, policies, and programs to protect residents from excessive noise. Additionally, City of Gardena Municipal Code §8.36.040 and §8.36.050 state the exterior and interior noise standards for the City in terms of Leq(15) and Lmax. Gardena Municipal Code §8.36.080(G) addresses noise associated with construction, repair, remodeling, grading, or demolition.

IMPACT ANALYSIS

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

Potentially Significant Impact. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators, can reach high levels. Construction activities are anticipated to include site preparation, grading, building construction, paving, and architectural coating. Nearby noise-sensitive receptors could be exposed to elevated exterior noise levels during Project construction that exceed adopted standards.

Construction activities could also cause increased noise along access routes to and from the Project site due to movement of equipment, materials, and workers. The EIR will further evaluate the potential for the Project's construction activities to result in a temporary increase in ambient noise levels in the Project's vicinity in excess of City standards.

The Project proposes to replace the existing industrial use with a TOD. Since the existing building is currently operating as an auto parts warehouse, there is existing operational noise. The Project would introduce mobile and stationary source operational noise consistent with typical residential developments. The stationary noise sources associated with the current industrial uses would be removed and replaced with stationary noise typical of a multi-family residential use. The Project would also generate traffic volumes along nearby roadways, which could result in noise level increases along area roadways. The EIR will further evaluate the potential for Project operations to result in a temporary or permanent increase in ambient noise levels in the Project's vicinity in excess of City standards.

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

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

The Project proposes a residential development that would remove the existing industrial uses, removing the groundborne vibration associated with existing truck operations. The EIR will further evaluate the Project's potential to generate excessive groundborne vibration or groundborne noise levels.

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

Less Than Significant Impact. Refer to Response 4.9e. Hawthorne Airport is approximately 0.45 mile north of the Project site. Review of the Hawthorne Airport's Airport Influence Area Map indicates the Project site is outside of the Influence Area boundaries. Therefore, the Project would not expose people residing or working in the Project area to excessive airport- or airstrip-related noise levels. Impacts would be less than significant in this regard. This issue will not be further analyzed in the EIR.

4.14 Population and Housing

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

IMPACT ANALYSIS

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

Potentially Significant Impact. The City's current population as of January 1, 2020 is approximately 60,397 persons.[22] The City's housing stock totaled 21,982 DU with approximately 2.83 PPH. The Project would remove all existing on-site structures and, in their place, construct a single TOD building with up to 265 DUs. Because the Project proposes new DUs, Project implementation would induce population growth in the City. The EIR will further evaluate whether the Project's forecast population growth is substantial or unplanned.

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

No Impact. The Project would not displace existing housing or require construction of replacement housing elsewhere, since no housing is located onsite. Therefore, no impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

4.15 Public Services

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

IMPACT ANALYSIS

4.15a Fire Protection?

Potentially Significant Impact. The City contracts with LACFD to provide fire protection and emergency medical services for the City. LACFD operates two fire stations within the City: Fire Station 158, located at 1650 West 162nd Street, and Fire Station 159, located at 2030 West 135th Street. The City of Gardena fire station nearest the Project site is Station #159, approximately 0.75 mile to the southeast. The fire station nearest the Project site, LACFD Station #162, is approximately 0.5 mile to the north in the City of Hawthorne at 12151 Crenshaw Boulevard. The Project's forecast population growth would incrementally increase the demand for fire protection and emergency medical services to the Project site. The EIR will further evaluate the Project's potential to result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities.

4.15b Police Protection?

Potentially Significant Impact. Police protection services to the Project would be provided by the City of Gardena Police Department (GPD). The police station nearest the Project site is at 1718 West 162nd Street, approximately 2.4 miles to the southeast. The Project's forecast population growth would incrementally increase the demand for police protection services to the Project site. The EIR will further evaluate the Project's potential to result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities.

4.15c Schools?

Potentially Significant Impact. The Project site is within Los Angeles Unified School District (LAUSD) boundaries. The proposed Project is forecast to generate an increase in student

population. The EIR will further evaluate the Project's potential to result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities.

4.15d Parks?

Potentially Significant Impact. See Response 4.16 below.

4.15e Other public facilities?

Potentially Significant Impact. Los Angeles County Library operates 84 community-based library outlets, including four bookmobiles in 51 of 88 cities and unincorporated areas.[23] Los Angeles County Library is responsible for maintenance and library improvements to meet future library service's demands. The Project's forecast population growth would incrementally increase the demand for library services. The EIR will further evaluate the Project's potential to result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities.

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

4.16 Recreation

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

IMPACT ANALYSIS

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

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

Potentially Significant Impact. The Project's forecast population growth could incrementally increase the use of existing recreational facilities. The EIR will further evaluate whether this incremental increase would be such that substantial physical deterioration of an existing recreational facility would occur or be accelerated. The EIR will also further evaluate the Project's potential to result in substantial adverse physical impacts associated with the provision of new or physically recreational facilities.

4.17 Transportation

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

IMPACT ANALYSIS

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

Potentially Significant Impact. The Project would increase pedestrian, bicyclist, and vehicle traffic in the Project area. The EIR will further evaluate whether this increase would conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

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

Potentially Significant Impact. The Project would increase vehicle traffic in the Project area. Therefore, the EIR will further evaluate the Project's vehicle miles traveled (VMT) for consistency with State CEQA Guidelines §15064.3, subdivision (b)

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

Potentially Significant Impact. The Project would convert an industrial property to a residential use and construct new onsite features, including curves, which may increase hazards due to a geometric design feature. The EIR will further evaluate the Project's design features for hazards and evaluate the Project's use for incompatibility.

4.17d Would the project result in inadequate emergency access?

Potentially Significant Impact. The Project would replace the existing site access. The EIR will further evaluate if this would result in inadequate emergency access.

4.18 Tribal Cultural Resources

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

IMPACT ANALYSIS

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

4.18aii Cause a substantial adverse change in the significance of a tribal cultural resource- a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact. Past development has previously disturbed the Project site. Given the extent of onsite ground disturbances from previous development and the area's urbanized nature, there is low potential for the Project's ground-disturbing activities to encounter tribal cultural resources. Notwithstanding, the potential exists for accidental discovery of tribal cultural

resources during ground-disturbing activities. The EIR will further evaluate these potential impacts.

4.19 Utilities and Service Systems

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

IMPACT ANALYSIS

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

i. Water,

ii. Wastewater,

iii. Wastewater Treatment,

iv. Stormwater Drainage,

i. Electric Power, Natural Gas, and Telecommunications.

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

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

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

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

Potentially Significant Impact. The Project would increase utility usage and demands within the Project site, potentially resulting in the need to relocate or construct new utility facilities, insufficient water supplies, a determination by the wastewater provider of insufficient capacity, or excessive waste. The EIR will further evaluate these potential impacts.

4.20 Wildfire

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

IMPACT ANALYSIS

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

No Impact. According to CalFire Fire Hazard Severity Zone Map for the City, the Project site is not within a State Responsibility Area. The Project site is in a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) within a local responsibility area.[24] Project design and site access would adhere to LACFD regulations and designs. Further, Project construction would not require the complete closure of any public or private streets during construction. Temporary construction activities would not impede use of the streets for emergencies or access for emergency response vehicles. Therefore, the Project would not result in inadequate emergency access. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

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

No Impact. As discussed above, the Project is not within an area classified as VHFHSZ. Therefore, no impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

No Impact. As discussed above, the Project is not within an area classified as VHFHSZ. The Project site is surrounded by development in an urbanized area of the City. The Project would tie into existing infrastructure that currently serves the Project site. Project implementation would not result in the construction, installation, or maintenance of new infrastructure that would exacerbate fire risk. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

No Impact. The Project is not within an area classified as VHFHSZ. The Project site and surrounding vicinity are relatively flat. There are no known landslides near the site nor is the site in the path of any known or potential landslides. Therefore, the Project would expose people or structures to significant risks, as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

4.21 Mandatory Findings of Significance

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

IMPACT ANALYSIS

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

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

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

Potentially Significant Impact. The Project would replace the existing onsite light-industrial building with up to 265 DUs, which could degrade the quality of the environment, result in cumulatively considerable impacts, or adverse effects on human beings. The EIR will further evaluate these potential impacts.

5.0 REFERENCES

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