HOTEL DEVELOPMENT STANDARDS GENERAL PLAN & ZONING CODE AMENDMENT PROJECT

PUBLIC REVIEW DRAFT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
JANUARY 2021

Prepared for:

City of Gardena
Community Development Department
Development Services
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Gardena, CA 90247

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

A Land Use Planning, Design, and Environmental Firm

HOTEL DEVELOPMENT STANDARDS GENERAL PLAN & ZONING CODE AMENDMENT PROJECT

Public Review Draft

Initial Study/Mitigated Negative Declaration

LEAD AGENCY: CITY OF GARDENA

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1.0 INTRODUCTION

1.1 Statutory Authority and Requirements

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

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

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

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

The environmental documentation, which is ultimately selected by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent

discretionary actions upon the proposed Project. The resulting environmental documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

1.2 Summary of Findings

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

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

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

Based on the Environmental Checklist Form and supporting environmental analysis provided in Section 4.0, Environmental Analysis, the proposed Project would have no impact or a less than significant impact concerning all environmental issue areas, except the following, for which the Project would have a less than significant impact with mitigation incorporated:

- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Transportation
- Tribal Cultural Resources

1.3 Public Review Process

The Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration has been provided to the Clerk of the County of Los Angeles and mailed to responsible agencies and trustee agencies concerned with the Project and other public agencies with jurisdiction by law over resources affected by the Project. A 20-day public review period has been established for the IS/MND in accordance with State CEQA Guidelines Section 15073. During the public review period, the IS/MND, including the technical appendices, was made available for review at the following location:

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

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

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

John F. Signo, AICP
Senior Planner
City of Gardena, Community Development Department
1700 West 162nd Street
Gardena, CA 90247-3730
Email: jsigno@cityofgardena.org

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised, and if further documentation may be required. If no new environmental issues have been raised or if the issues raised do not provide substantial evidence that the Project would have a significant effect on the environment, the IS/MND will be considered for adoption and the Project for approval.

1.4 Incorporation by Reference

Pursuant to State CEQA Guidelines Section 15150, a MND may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the MND's text.

The references outlined below were utilized during preparation of this Initial Study. Copies of these documents are available for review on the City's website (http://www.cityofgardena.org/) unless otherwise noted.

City of Gardena General Plan 2006, adopted April 25, 2006. The City adopted the comprehensive *Gardena General Plan 2006* (General Plan) in 2006. Subsequently, the Community Development Element's Land Use Plan was updated in June 2012 and February 2013, with additional changes to the Land Use Map since that time, and the Circulation Plan was updated in July 2020. The 2014-2021 Housing Element was adopted in November 2013 and found to be in compliance by the Department of Housing and Community Development in December 2013. The Gardena General Plan is comprised of the following Elements and Plans:

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

    - Noise Plan
- Implementation
    - Implementation Program

The General Plan constitutes the City's overall plans, goals, and objectives for land use within the City's jurisdiction. The General Plan is based upon the following core visions for the City: City of Opportunity; Safe and attractive place to live, work and play; Community that values ethnic and cultural diversity; Strong and diverse economic base. It evaluates the existing conditions and provides long-term goals and policies necessary to guide growth and development in the direction that the community desires. Through its Goals, Objectives, Policies, and Programs, the General Plan serves as a decision-making tool to guide future growth and development decisions.

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

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

With the adoption of Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy) (Connect SoCal RTP/SCS) on September 3, 2020, SCAG distributed the 6th cycle (2021-2029) draft RHNA Allocation to local jurisdictions. Jurisdictions are permitted to appeal their allocations to the SCAG RHNA Appeals Board. On October 23, 2020, the City filed an appeal. Hearings are scheduled through January, 2021. After SCAG reallocates units to all local jurisdictions resulting from successful appeals, SCAG's Regional Council will review and consider adoption of the Final RHNA Plan for SCAG's 6th cycle RHNA. This is scheduled to occur in February 2021.

Gardena Municipal Code. The Gardena Municipal Code regulates municipal affairs within the City's jurisdiction including, without limitation, zoning regulations (codified in Gardena Municipal Code Title 18). The Municipal Code is the primary method used for implementing the General Plan's Goals, Objectives, and Policies. Gardena Municipal Code Title 18, Gardena Zoning Law, specifies the rules and regulations for construction, alteration and building of structures within the City, along with Title 15 on Buildings and Construction.

1108 W. 141st Street GPA & ZC Final Initial Study/Mitigated Negative Declaration, December 2020. The 1108 W. 141st Street GPA & ZC Initial Study/Mitigated Negative Declaration (IS/MND) analyzes the potential environmental impacts associated with the proposed 1108 W. 141st Street GPA & ZC Project, which proposes a General Plan Amendment (GPA) #4-20 and Zone Change (ZC) #3-20 to redesignate the property as General Commercial with a Mixed-Use Overlay in the Land Use Plan and rezone the property as General Commercial (C-3) with a Mixed-Use Overlay (MUO) designation. Although a specific development was not proposed at the time, based on the existing agreements and development

standards that would be applicable to the site associated with the proposed GPA and ZC, the CEQA analysis considered the potential for future development of a four-story hotel (65 feet high) with up to 126 rooms within a single structure of approximately 68,000 square feet and a separate 5,000 square foot restaurant on 2.0 acres of the 4.59-acre Project site. The remaining acreage would remain as required parking for the adjacent casino. The IS/MND concluded the 1108 W. 141st Street Project would have no impact or a less than significant impact concerning all environmental issue areas, except the following, for which the Project would have a less than significant impact with mitigation incorporated: Biological Resources; Geology and Soils; Greenhouse Gas Emissions; and Transportation.

1.5 Report Organization

This document is organized into the following sections:

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

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

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

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

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

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2.0 PROJECT DESCRIPTION

2.1 Project Location

The City of Gardena is located in the South Bay Region of Los Angeles County, approximately 13 miles south of downtown Los Angeles; refer to Exhibit 2-1, *Project Location*. The proposed Hotel Development Standards General Plan Amendment and Zoning Code Amendment (Project) would primarily apply to all properties within the City of Gardena that are designated General Commercial and Industrial and zoned General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2), and that are located on an Arterial or Major Collector Street; refer to Exhibit 2-2; Potential Amenity Hotel Sites. However, it should be noted the Project includes an amendment to the General Plan Land Use Plan to allow for an increased FAR for specific uses or zones along arterials and major collector streets up to a 2.75 FAR in the General Commercial land use area for specific uses or zones (self-storage facilities are already authorized to have a FAR of 2.75) and up to a 2.00 FAR in the Industrial area for specific uses or zones, and other minor clean-up language to the Zoning Code, as described below. These minor revisions to the Zoning Code would apply to any property within the specific Zoning district (that is, not limited to properties within the City of Gardena that are designated General Commercial and Industrial and zoned General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2), and that are located on an Arterial or Major Collector Street).

2.2 General Plan and Zoning

The Gardena General Plan Land Use designations that provide for hotel development consist of the following:

General Commercial (Maximum Permitted FAR: 0.5). The General Commercial land use designation provides for a wide range of larger scale commercial uses to serve both the needs of the City and the region. It is intended for commercial uses such as regional retail, automobile dealerships, supermarkets, junior department stores, financial centers, professional offices, restaurants, and other commercial uses oriented to the traveling public. Its corresponding zoning are Business and Professional Office (C-P), General Commercial (C-3), Heavy Commercial (C-4) and Parking (P).

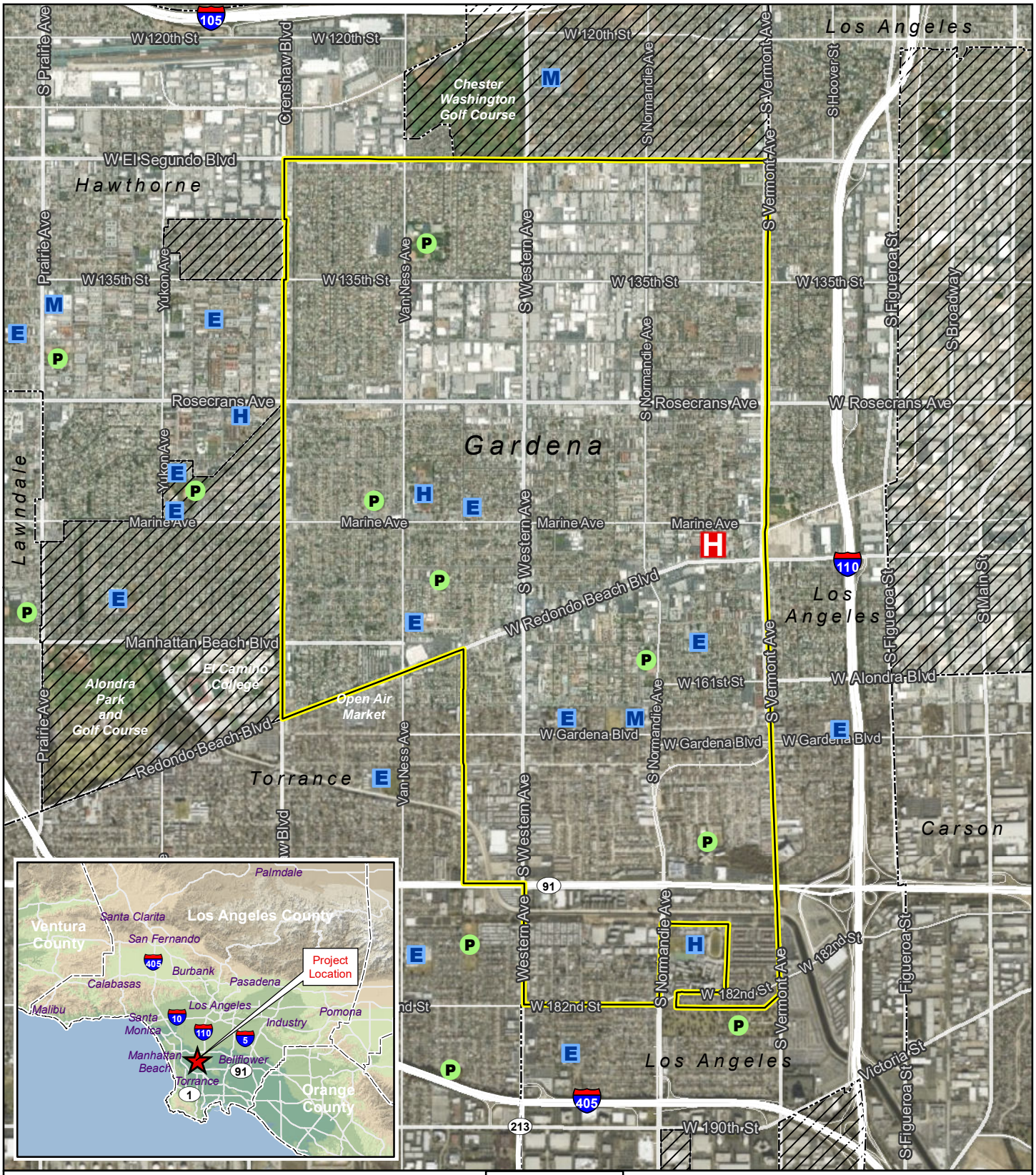
Industrial (Maximum Permitted FAR: 1.0). The Industrial land use designation allows for a wide variety of clean and environmentally friendly industries, technology-related uses and supporting facilities, and business parks. Most of the Industrial land use designation is located in the northern portion of the City, and is implemented by the Industrial (M-1) and General Industrial (M-2) zones.

The Gardena Zoning Districts that allow for hotel development consist of the following:

General Commercial (C-3). The C-3 zone is intended for general commercial uses. Hotel uses are conditionally permitted uses within the C-3 zone. The maximum FAR is 0.5.

Heavy Commercial (C-4). The C-4 zone is intended to provide for highway related uses. Hotel uses are conditionally permitted uses within the C-4 zone. Except for self-storage facilities which may have a FAR of up to 2.75, the maximum FAR is 0.5.

Industrial (M-1) and General Industrial (M-2). The M-1 and M-2 zones are intended for commercial, manufacturing, and industrial uses. Hotel uses are conditionally permitted uses within the M-1 and M-2 zones. The maximum FAR is 1.0.


Los Angeles
W 120th St
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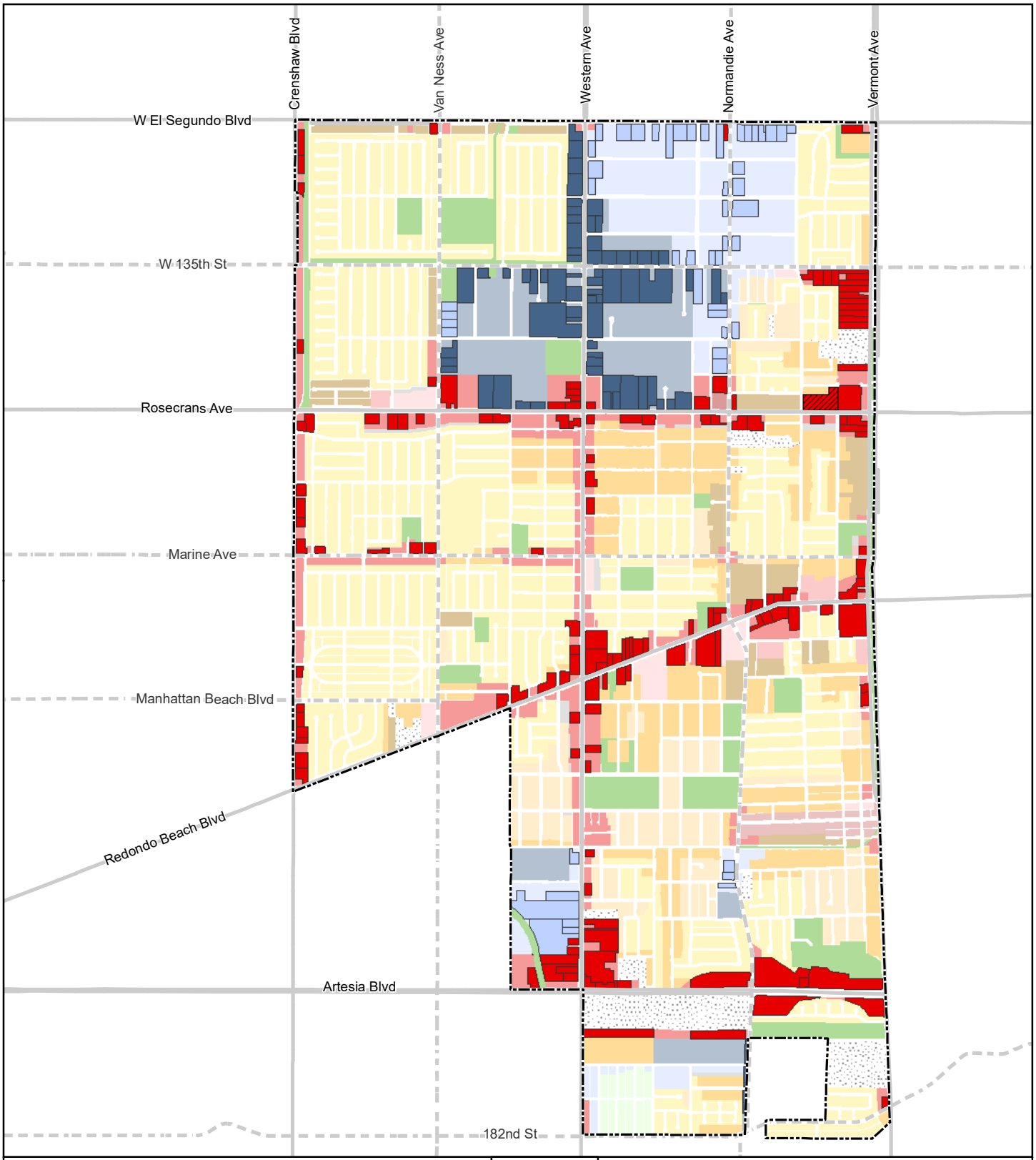
Crenshaw Blvd
Chester Washington Golf Course
S Normandie Ave
S Vermont Ave
S Hoover St
W El Segundo Blvd
Hawthorne
Prairie Ave
Yukon Ave
W 135th St
Van Ness Ave
S Western Ave
S Figueroa St
S Broadway
Rosecrans Ave
W Rosecrans Ave
Gardena
Lawndale
Marine Ave
S Main St
W Redondo Beach Blvd
Manhattan Beach Blvd
El Camino College
Alondra Park and Golf Course
Open Air Market
Redondo Beach Blvd
Torrance
W 161st St
W Alondra Blvd
W Gardena Blvd
Carson
W 182nd St
Figueroa St
Victoria St
W 190th St
Palmdale
Santa Clarita
Los Angeles County
Ventura County
San Fernando
Burbank
Pasadena
Calabasas
Malibu
Santa Monica
Los Angeles
Industry
Pomona
Manhattan Beach
Bellflower
Torrance
Orange County
Project Location
Legend
Project Location/ Gardena City Boundary
Surrounding City
Unincorporated
Park
Hospital
Elementary School
Middle School
High School
Adult Education
0 1,000 2,000
Feet
CITY OF GARDENA
HOTEL DEVELOPMENT STANDARDS
GENERAL PLAN AND ZONING CODE AMENDMENT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
Exhibit 2-1. Project Location
Sources: Los Angeles County; Google Maps; ArcGIS Online World Imagery Map Service. Map date: November 2, 2020. Revised: January 11, 2020.
De Novo Planning Group
A Land Use Planning, Design, and Environmental Firm



Legend

Gardena City Limits — Arterial Roads — Major Collector Roads

Possible Amenity Hotel Site by Zoning Designation

C3 | C3 (Mixed Use Overlay) | M1 | M2

Gardena Zoning Designations

SPA	C4	HB	O	R2
C2	CP	M1	P	R3
C3	CR	M2	R1	R4

Sources: Los Angeles County GIS; Gardena Zoning Map, January 2018. Date: October 20, 2020. Revised: January 11, 2021.

0 600 1,200
Feet

CITY OF GARDENA
HOTEL DEVELOPMENT STANDARDS GENERAL PLAN AND ZONING CODE AMENDMENT PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Exhibit 2-2. Potential Amenity Hotel Sites

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2.3 Project Characteristics

The City of Gardena is proposing to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code, as described below.

The current hotel development standards, which include, but are not limited to height requirements, setbacks, floor area ratios, and parking requirements were adopted in 1990 based on concerns due to the increase in the number of hotels/motels being developed on small narrow lots within the City's commercial zones which lacked amenities such as open space, adequate parking, landscaping, and recreational facilities. Since adoption of the new regulations, only one new hotel has been built within the City, which was approved in 2013. New hotel development operators could capitalize on opportunities from recent mixed-use development and other attractions in nearby cities. The Project proposes to add a definition of "amenity hotel" to distinguish what will be allowed by right from the types of hotels that became problematic in earlier years.

The Project proposes a General Plan Amendment to amend the Land Use Plan for the General Commercial designation to allow for an increased FAR under the Zoning Code for specific uses or zones (self-storage facilities are already authorized to have a FAR of 2.75) and up to 2.00 FAR in the Industrial area under the Zoning Code for specific uses or zones; however, amenity hotels would only be allowed to develop under a maximum FAR of 2.0 and only when located on an arterial or major collector street.

The Project also proposes additional amendments to the Zoning Code, which include minor clean-up language, including to uses permitted within the C-3 zone in order to more accurately reflect uses that occur and are permitted within the City; no new permitted uses other than amenity hotels are proposed, and to increase the height limit for the C-3 zone which was inadvertently omitted during earlier code changes that increased the height limit for the C-2 and C-4 zones.

Overall, the Project consists of: 1) a General Plan Amendment to amend the Land Use Plan for the General Commercial and Industrial designations to allow a higher FAR under the Zoning Code for specific uses or zones; and 2) Zoning Code Amendments to amend the hotel development standards specific to amenity hotels and to provide minor clean-up and revisions to the Zoning code. The specific changes to the General Plan and Zoning Code proposed as part of the Project are identified below with new text shown with a double underline (example) and deleted text shown in strikethrough (~~example~~).

GENERAL PLAN AMENDMENT

The General Plan Land Use Plan (Page LU-12) descriptions for Non-Residential Designations specific to General Commercial and Industrial would be modified as follows:

GENERAL COMMERCIAL

(Maximum Permitted FAR: 0.5 in general; up to 2.75 ~~if self-storage facilities are included~~ for specific uses)

The General Commercial land use designation provides for a wide range of larger scale commercial uses to serve both the needs of the City and the region. It is intended for commercial uses such as regional retail, automobile dealerships, supermarkets, junior department stores, financial centers, professional offices, restaurants, and other commercial uses oriented to the traveling public. Its corresponding zoning are Business and Professional Office (C-P), General Commercial (C-3), Heavy Commercial (C-4)

and Parking (P). Higher FARs of up to 2.75 may be allowed under the Zoning Code for specific uses or zones.

INDUSTRIAL

(Maximum Permitted FAR: 1.0 in general; up to 2.00 for specific uses)

The Industrial land use designation allows for a wide variety of clean and environmentally friendly industries, technology-related uses and supporting facilities, and business parks. Most of the Industrial land use designation is located in the northern portion of the City, and is implemented by the Industrial (M-1) and General Industrial (M-2) zones. Higher FARs of up to 2.00 may be allowed under the zoning Code for specific uses or zones.

ZONING CODE AMENDMENT

Gardena Municipal Code Title 18, Zoning, would be amended as follows:

Chapter 18.04 DEFINITIONS

The following definition for "Hotel, amenity" would be added to the list of definitions:

18.04.245 Hotel, amenity

"Hotel, amenity" means a hotel with amenities such as: indoor lobby/lounge area with complimentary Wi-Fi meant for guests to sit, relax, and work; spa facilities; outside lounge areas meant for guests to sit, relax, and work, including common area patios and rooftop decks; pool or other improved recreation areas; gym facilities; conference centers; or other amenities of similar nature that are for the benefit of guests and located outside of the individual rooms.

Chapter 18.32 GENERAL COMMERCIAL ZONE (C-3)

18.32.020 Uses permitted

Amenity hotels would be added to Section 18.32.020 as a permitted use:

B. Stores, businesses, or commercial activities not involving any kind of manufacture, processing, or treatment of products other than that which is clearly incidental and essential to a retail business conducted on the premises and that such operations are not objectionable due to noise, odor, dust, smoke, vibration, or other similar causes. Permitted uses shall include:

1. Amenity hotels, subject to the requirements of Section 18.42.190:

The remainder of the list of permitted uses would be renumbered and several similar uses combined and/or removed as they are no longer relevant.

2~~1~~. Antique stores;

~~2. Deleted;~~

3. Bowling alleys;

~~4. Blueprinting and photostating;~~

~~5. Bird stores and pet shops;~~

~~6. Chinchilla sales;~~

4~~7~~. Conservatories of music;

5~~8~~. Dancing academies;

6~~9~~. Gymnasiums;

7~~10~~. Legal card clubs;

8~~11~~. Laboratories, medical and dental;

912. Mortuaries;

10~~13~~. Music and vocal instruction;

11~~14~~. Nursery sales of flowers and plants;

12~~15~~. Pet shops;

13~~16~~. Medical and dental offices and clinics;

14~~17~~. General offices ~~Real estate offices~~;

15~~18~~. Refrigerated food lockers;

~~19. Taxidermists;~~

~~20. Telephone exchanges;~~

~~21. (Repealed);~~

16~~22~~. Furniture upholstery shops;

~~23. *Repealed;*~~

17~~24~~. Secondhand store and/or thrift shop, when located at least five thousand feet from pawn shop or another secondhand store and/or thrift shop;

~~25. *Repealed;*~~

18~~26~~. Veterinary clinics and hospitals;

18.32.030 Uses permitted subject to a conditional use permit

Text to clarify that amenity hotels would not be subject to a conditional use permit would be added:

I. Hotels and motels, but not amenity hotels;

18.32.050 Property development standards

The following changes would be made to the development standards:

C. Building height/FAR: Building heights shall not exceed sixty-five feet in general[1]; ~~Building height shall be limited to two and one-half stories~~, shall not exceed thirty-five feet within one hundred feet of a zone boundary line between the C-3 zone and any R-1 and R-2 zone; and shall not exceed fifty ~~forty-five~~ feet within one hundred feet of a zone boundary line between the C-3 and R-3 or R-4 zones. The gross floor area of all buildings or structures on a lot or lots that comprise a project site shall not exceed 0.50 (FAR) with the exception of amenity hotels, which may have a FAR of up to 2.0.

E. A minimum ten-foot landscape perimeter shall be provided on all front-yard street frontages. A minimum five-foot landscape perimeter shall be provided on all side-yard street frontages.

Chapter 18.36 INDUSTRIAL ZONE (M-1)

18.36.020 Uses permitted

Amenity hotels would be added to Section 18.36.020 as a permitted use:

P. Amenity hotels, subject to the requirements of Section 18.42.190:

18.36.030 Uses permitted subject to a conditional use permit

Text to clarify that amenity hotels would not be subject to a conditional use permit would be added:

J. Motels and hotels, but not amenity hotels.

18.36.060 Property development standards

The following changes would be made to the development standards:

A. Building height/FAR: Building heights shall in no case exceed sixty-five feet, shall not exceed thirty-five feet within one hundred feet of a zone boundary line between the M-1 zone and any R-1 and R-2 zones, and shall not exceed fifty ~~forty-five~~ feet within one hundred feet of a zone boundary line between the M-1 and R-3 or R-4 zones. The maximum gross floor area of buildings or structures on a lot or lots that comprise a project site shall not exceed 1.0 FAR , except for amenity hotels, which may have a FAR of up to 2.0.

B. Building restrictions:

1. No opening in the exterior wall of a building shall be allowed on industrial buildings when the exterior wall of such building faces an R zone on the rear, side, or front property lines and is within 60 feet of such zone.

Exceptions:

~~a. If such building is situated sixty feet or more from an R zone, openings in exterior walls facing such R zone shall be allowed.~~

a ~~b~~. Any openings may be allowed in exterior walls of such buildings if they are required by law providing they are equipped with self-closers and are of solid material.

[1] The increase in height is a clean-up from an earlier code change when the height limit for the C-2 and C-4 zones were increased to 65 feet and the change was inadvertently omitted for the C-3 zone, leaving it without a height limit and only a reference to stories.

b ~~c~~. Solid panels of glass block shall be allowed regardless of the distance from the property line.

~~d. Openings shall be allowed into areas used for office space only; such openings shall be glazed with obscure glass, facing side or rear property lines only.~~

2. Noise emitted by any use shall comply with standards set forth in Chapter 8.36.

E. Landscape perimeters shall be provided on all street frontages except alleyways. The landscape perimeters shall be a minimum of ten feet in the front yard and five feet in the side yard and shall have automatic sprinkler systems.

Chapter 18.40 OFF-STREET PARKING AND LOADING

18.40.040 Number of parking spaces required

Parking for amenity hotels would be added to Section 18.40.040:

Hotels and Motels: One space per guest room for guest parking, plus one space per six rooms for employee parking with a minimum of three spaces for employees, plus provision of spaces for additional uses within the hotel/motel complex;

Amenity Hotels: A parking ratio of 0.85 space per guest room for guests and employees, plus provision of spaces for additional uses within the hotel at the rates specified in this section for such uses. The rate for additional uses may be reduced based on a parking study which justifies such reduction;

18.40.050 Size of parking spaces

Under Section 18.40.050, F, the aisle width listed in Figure 3, Line F would be amended as follows:

Figure 3 Label	Design Component		Parking Angle				
			0° (Parallel)	30°	45°	60°	90°
F	Aisle Width	One-Way	13’	14’	16’	19’	N/A
		Two-Way	24’	22’	24’	24’	25’ ~~26’~~

The diagram illustrating minimum dimensions for common parking lot layouts would also be revised to reflect the above.

Chapter 18.42 GENERAL PROVISIONS

Section 18.42.085 Building setbacks for commercial and industrial development

The standards for building setbacks would be modified, as follows:

The following building setbacks shall be established and maintained in addition to setbacks that may be required for planned rights-of-way for new and expanded structures:

1. Front building setback:

a. Where commercial or industrial zoned property fronts a street, there shall be a building setback of not less than ten feet, which shall be landscaped and maintained.

b. Where commercial or industrial zoned property abuts or is adjacent to a R zone, there shall be a building setback not less than twenty feet, which shall be landscaped and maintained.

c. Where Commercial or industrial zoned property faces a R zone, there shall be a building setback not less than twenty feet, which shall be landscaped and maintained.

2. Side building setback:

a. Where Commercial or industrial zoned property sides upon a street, there shall be a side yard not less than five ~~ten~~ feet abutting the street, which shall be landscaped and maintained.

b. Where the side ~~or rear~~ lot line of Commercial or industrial property abuts any R zone and there is no intervening alley, there shall be a side yard not less than five feet. There shall also be an eight-foot-high solid masonry wall erected and maintained along the side lot line abutting any R zone; provided, however, such wall shall be only three and one-half feet high from the building line of the R zone to the front lot line any street frontage.

3. Rear building setback:

a. Where commercial or industrial zoned property rears upon a street, there shall be a rear-building setback of not less than ten feet, which shall be landscaped and maintained.

b. Where the rear lot line abuts any R zone and there is no intervening alley, there shall be a building setback of not less than five feet and an eight-foot-high solid masonry wall shall be erected and maintained along the rear lot line abutting any R zone; provided, however, such wall shall be only three and one-half feet high within the ten feet closest to a street.

c. Rear building setbacks may be used for off-street parking or storage, except as described in subsection B(3)(b) of this section, where the yard is of adequate size and depth and the provisions of Chapter 18.40 of this code are met. When such yard is used for storage, the height of such storage shall not exceed six feet.

Section 18.42.120 Distance between buildings

The standards for distance between buildings would be modified, as follows:

Zones in which tall buildings are permitted: in all zones where buildings of three or more stories in height are permitted, the requirements for space between buildings on the same site shall be increased two and one-half feet for each story, or fraction thereof, above the second story.

Section 18.42.190 Amenity Hotel

Amenity hotels, as allowed in the C-3, C-4, M-1, or M-2 zone shall comply with the following requirements:

A. The hotel contains a minimum of two amenities, including but not limited to:

1. An indoor lobby/lounge area with complimentary Wi-Fi designed and equipped as a social space for guests to sit, relax, eat, drink, and work;
2. Day spa facilities;
3. Outside, landscaped, lounge areas designed and equipped for guests to sit, relax, eat, drink, and work, including common area patios and rooftop decks;
4. A pool or other outside improved and landscaped recreation areas;
5. A fitness center that is a minimum of 400 square feet in size with sufficient equipment other than, or in addition to, free weights to allow a minimum of four individuals to work out at the same time;
6. Event space that is a minimum of 375 square feet in size;
7. Other amenities of similar nature that are for the benefit of guests and located outside of the individual rooms.

B. The majority of rooms are accessed from an interior lobby, courts, or interior hallway;

C. Lot size: minimum of ½ acre;

D. Location: located on an arterial or major collector street;

E. Does not contain more than 20% of rooms with kitchens or kitchenette facilities;

F. Meets all other development standards of the applicable zone; and

G. Complies with the mitigation measures and standard conditions of approval that were identified in the environmental assessment for the ordinance allowing amenity hotels or that are found to be equivalent.

Chapter 18.46 CONDITIONAL USE PERMITS

Section 18.46.030 Uses permitted subject to a conditional use permit

The description of uses permitted subject to a conditional use permit specific to Hotels and motels would be modified, as follows:

C. The following uses may be permitted pursuant to this section in the zones specified with a conditional use permit. In no case shall a conditional use permit be granted in a zone for a use specifically prohibited in a zone within which the subject property is located:

15. Hotels and motels in the C-3, C-4, M-1 and M-2 zones; provided, that:

a. The minimum lot area for hotels or motels shall be one acre exclusive of all other buildings or uses located on the same lot in a mixed use development;

b. The minimum lot width for hotel or motel developments shall be one hundred feet. The minimum lot depth shall be one hundred fifty feet;

c. A minimum of twenty feet front yard setback shall be provided, and not less than twenty percent of the total paved area utilized for driveways and open parking shall be landscaped pursuant to regulations set forth in Section 18.40.090;

d. The Planning Commission may allow the reduction of parking below that set forth in Section 18.40.040 based on a ~~A~~ parking demand/traffic impact study, paid for by the proponent ~~of a hotel/motel, has been~~ and prepared by a qualified traffic engineer;

e. A market analysis/financial feasibility study, paid for by the proponent of a hotel/motel, has been prepared by a qualified consultant;

~~f. The engineer/consultant preparing the studies required by subsections C(15)(d) and (e) of this section shall be from a list of engineers and consultants approved by the community development department;~~

f ~~g~~. Not more than twenty percent of the guest rooms shall be equipped with kitchens or kitchenette facilities.

APPROACH TO THE ANALYSIS

Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. The City anticipates that up to four amenity hotels with up to 450 hotel rooms in total could be accommodated on arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City. The exact location and specific development characteristics of the potential amenity hotels are not currently known.

However, one site, located at the northeast corner of Rosecrans and Budlong Avenues, has been identified as having the potential to accommodate an amenity hotel. The property owner has recently requested to redesignate the 4.59-acre property as General Commercial with a Mixed-Use Overlay in the Land Use Plan and rezone the property as General Commercial (C-3) with a Mixed-Use Overlay (MUO) designation (1108 W. 141st Street GPA & ZC Project). The site is currently subject to a Conditional Use Permit (CUP) for parking for the benefit of the adjacent casino and is subject to an economic incentive agreement. Based on that agreement, as well as an Offering Memorandum done in 2018, it was determined that the most reasonable development to analyze for purposes of the CEQA analysis was a hotel and restaurant to be developed on 2.0 acres with the remaining acreage retained as required parking for the casino. The environmental review acknowledged that the City was going to be considering amending the development standards for amenity hotels as part of a separate project, and that if the 1108 W. 141st Street GPA & ZC Project was approved, subsequent amendments to the City's development standards for amenity hotels would apply to the site if an amenity hotel is proposed for future development. It was also acknowledged that although the proposed amendments to the City's development standards would include an increase in FAR to 2.0, discussion with hotel developers and an examination of other hotels in the area determined that a hotel at a FAR of 2.0 on the site would not be a viable option. Thus, the environmental analysis considered the potential for development of a four-story hotel (65 feet high) with up to 126 rooms within a single structure of approximately 68,000 square feet and a separate 5,000 square foot restaurant on 2.0 acres of the 4.59-acre site. On December 15, 2020 the City Council adopted Resolution No. 1486 approving the Mitigated Negative Declaration and Mitigation and Monitoring Program for this change and adopted Resolution No. 6487 changing the land use designation. The Ordinance for the zone change was also introduced that night and is scheduled for second reading on January 12, 2021.

For purposes of this environmental review, it is assumed that one amenity hotel with up to 126 rooms would be developed at the northeast corner of Rosecrans and Budlong Avenues and the remaining three amenity hotels with up to 324 rooms would occur on arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City in accordance with the proposed amenity hotel development standards. Since environmental review has been conducted for a potential 126-room hotel at the northeast corner of Rosecrans and Budlong Avenues, this MND does not repeat the site-specific analysis prepared within the 1108 W. 141st Street GPA & ZC Project MND; however, the site is considered within the context of the proposed Zone Change specific to amenity hotels and from a cumulative perspective to assess the potential for development of up to four hotels within the City.

As stated, the exact location and specific development characteristics of each of the amenity hotels are not known, as site-specific development proposals are not currently proposed. A programmatic analysis of the potential development of up to four amenity hotels with up to 450 rooms along arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City has been prepared. Because the timing and location of the potential amenity hotels are unknown, as a conservative approach, it is assumed that development of two of the hotels would occur at the same time and within the 0.1-mile of each other. Construction and operation of two amenity hotels at the same time and within proximity to each other would provide for greater interaction of potential environmental impacts. It should be noted that the environmental analysis is conservative in that it does not account for any existing on-site uses and the environmental conditions associated with operations (e.g., air quality, greenhouse gas emissions, energy, noise, public services and utilities, vehicle miles traveled, etc.) that would be offset by removal of the existing use.

PROJECT PHASING

As stated, specific development is not currently proposed. Future development of amenity hotels would be contingent upon several factors. It is anticipated that construction activities associated with each individual hotel would likely occur within a single phase and may include demolition, site preparation, grading, building construction, and paving, architectural coating, and landscaping. For analysis purposes, it is assumed that no more than two hotels would be constructed at the same time and that development of up to four amenity hotels with up to 450 rooms would occur over the next 20 years. This is a conservative assumption based on the historic development of hotels within the City (one hotel has been built in the City since 1990; a Best Western was approved in 2013). Construction of each hotel is anticipated to average 20 months.

2.4 Required Approvals

The City Council must approve the General Plan Amendment to incorporate the revisions to the Land Use Plan into the General Plan and approve the Zoning Code Amendment to incorporate the revisions to the Zoning Code. Future grading and construction of an amenity hotel would be subject to the review of grading and architectural plans and issuance of grading and building permits by the City.

3.0 ENVIRONMENTAL CHECKLIST FORM

BACKGROUND

1. Project Title: Hotel Development Standards General Plan & Zoning Code Amendment
2. Lead Agency Name and Address: City of Gardena Community Development Department 1700 West 162nd Street Gardena, California 90247
3. Contact Person and Address: John F. Signo, AICP Senior Planner City of Gardena, Community Development Department 1700 West 162nd Street Gardena, California 90247 Email: jsigno@cityofgardena.org
4. Project Location: City of Gardena (Citywide)
5. Project Sponsor's Name and Address: City of Gardena 1700 West 162nd Street Gardena, California 90247
6. General Plan Designation: General Commercial and Industrial
7. Zoning: General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2).
8. Description of the Proposed Project: See Section 2.3.
9. Surrounding Land Uses and Setting: Properties zoned C-3, C-4, M-1, and M-2 are surrounded by a variety of urban uses within the City including residential and non-residential uses.
10. Other public agencies whose approval is required: No other public agencies have authority over the Project.
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? In compliance with AB 52, the City distributed letters to applicable Native American tribes informing them of the Project on July 20, 2020. At the time this Initial Study was made available for public review, no requests for consultation have been received; refer to Response 4.18.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

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

CITY OF GARDENA

Raymond Barragan
Acting Community Development Director

January 13, 2021
Date

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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4.0 ENVIRONMENTAL ANALYSIS

4.1 Aesthetics

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

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

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

Mitigation Measures: No mitigation measures are required.

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

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

[2] California Department of Transportation, Scenic Highway System Lists, *List of Eligible and Officially Designated State Scenic Highways* and *List of Officially Designated County Scenic Highways*, Scenic Highways | Caltrans, accessed December 3, 2020.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The Project proposes to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. The City of Gardena is urbanized and therefore any future development of an amenity hotel would occur within an urbanized area. Thus, the analysis focuses on whether the proposed Project would conflict with applicable zoning or other regulations governing scenic quality.

The proposed General Plan and Zoning language amendments that could potentially involve an impact to scenic quality includes the amendment to the General Plan for the General Commercial and Industrial designations to allow for an increased FAR for specific uses or zones and the amendment to the Zoning Code to allow for an increase in the height limit within the General Commercial (C-3) zone to be consistent with the Commercial (C-2) and Heavy Commercial (C-4) zones. Future development up to an FAR of 2.00 within the Industrial area and 2.75 within the General Commercial designation would only be allowed for specific uses or zones (self-storage facilities are already authorized to have a FAR of 2.75). Similarly, development at the height limit proposed within the C-3 zone is dependent on the specific location of the property and its proximity to residentially zoned properties. The City of Gardena Municipal Code establishes the development regulations for each zoning district within the City. Although the Gardena Municipal Code does not identify specific regulations governing scenic quality, any development would be required to comply with the City of Gardena Municipal Code development standards specific to the property, which include standards for lot area and dimensions, building height, setbacks, landscaping, signs, and off-street parking and loading. Additionally, any development would be required to comply with Gardena Municipal Code Chapter 18.42, *General Provisions*, which addresses landscape regulations, refuse enclosures, enclosure of mechanical equipment, and security and lighting plans, amongst others. Individual development projects would be reviewed to ensure compliance with the applicable zoning and site development regulations which are established to protect the overall aesthetics and character of the City. Thus, the Project would not conflict with applicable zoning and other regulations governing scenic quality.

Potential development of up to four amenity hotels would occur on Arterials and Major Collector streets within the C-3, C-4, Industrial (M-1), and General Industrial (M-2) zones. Site-specific development would be required to comply with the development standards applicable to the specific zone as established by the Gardena Municipal Code. As discussed above, although the Gardena Municipal Code does not identify specific regulations governing scenic quality, it does establish development standards, which include standards for lot area and dimensions, building height, setbacks, landscaping, signs, and off-street parking and loading. The standards account for surrounding uses, including limiting heights of buildings within proximity to residentially zoned properties. The existing development standards for these zones, along with the proposed development standards specific to amenity hotels, consider and respond to uses within

the surrounding area, such as residentially zoned properties. Further, any development would be required to comply with Gardena Municipal Code Chapter 18.42, *General Provisions*, which addresses landscape regulations, refuse enclosures, enclosure of mechanical equipment, and security and lighting plans, amongst others. Any proposal for development of an amenity hotel would be reviewed to ensure compliance with the Gardena Municipal Code development standards, including that the physical design is consistent and compatible with the site and surrounding area. Thus, the Project would not conflict with applicable zoning and other regulations governing scenic quality.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The City of Gardena is urbanized and currently experiences lighting typical of an urbanized area such as building interior and exterior lighting, parking lot security lighting, and street lighting along surrounding roadways. The proposed amendments to the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code would not alter requirements and standards specific to lighting and glare.

Development within the City, including amenity hotels, would likely introduce similar types of lighting including interior building lighting and exterior lighting associated with building illumination, landscape lighting, parking lot lighting, and security lighting. Any future development would be required to submit a complete security and lighting plan in accordance with Gardena Municipal Code Section 18.42.150, *Security and lighting plan*. The purpose of the security and lighting plan is to ensure that safety and security issues are addressed in the design of developments. Lighting plans for commercial developments are required to demonstrate an average of 1-foot candle for all public/common areas. A Photometric Plan would be required prior to Building Permit issuance to verify compliance with Municipal Code Section 18.42.150. The City would also review new lighting for conformance with the most current Building Energy Efficiency Standards to ensure the minimum amount of lighting is used, and no light spillage would occur. As a specific development project is not currently proposed, potential building materials are not known. However, any future development would be reviewed, including proposed building materials, to ensure the use of highly reflective materials or significant expanses of glass that could result in significant daytime glare would not occur. Thus, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.2 Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)?				X
d. Result in the loss of forest land or conversion of forest land to non-forest use?				X
e Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

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

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

No Impact. The City of Gardena does not contain any mapped Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.[3] Further, the City of Gardena does not contain zones for agricultural use or properties under a Williamson Act contract. Thus, the Project would not involve the conversion of farmland to a non-agricultural use or conflict with existing zoning for agricultural use or a Williamson Act contract.

[3] California Department of Conservation, *California Important Farmland Finder*, Department of Conservation Map Server (ca.gov), accessed December 3, 2020.

Mitigation Measures: No mitigation measures are required.

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

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

No Impact. No forest land, timberland, or timberland zoned Timberland Production occurs within the City. Thus, the proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use.

Mitigation Measures: No mitigation measures are required.

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

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

Mitigation Measures: No mitigation measures are required.

4.3 Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?			X	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c. Expose sensitive receptors to substantial pollutant concentrations?			X	
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

South Coast Air Quality Management District (SCAQMD) Thresholds

Mass Emissions Thresholds

The SCAQMD significance criteria may be relied upon to make the above determinations. According to the SCAQMD, an air quality impact is considered significant if a proposed project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality during project construction and operations, as shown in Table 4.3-1, *South Coast Air Quality Management District Emissions Thresholds*.

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

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

Localized Carbon Monoxide

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

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

The significance of localized impacts depends on whether ambient CO levels near the project site exceed State and federal CO standards. The South Coast Air Basin (SCAB) has been designated as attainment under the 1-hour and 8-hour standards.

Localized Significance Thresholds

In addition to the CO hotspot analysis, the SCAQMD developed Local Significance Thresholds ("LSTs") for emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project site without expecting to cause or substantially contribute to an exceedance of the most stringent national or state ambient air quality standards. LSTs are based on the ambient concentrations of that pollutant within the project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is applicable for all projects that disturb 5.0 acres or less on a single day. The City of Gardena is located within SCAQMD SRA 3 (Southwest Coastal LA County). Table 4.3-2, Local Significance Thresholds (Construction/Operations), shows the LSTs for a 1.0-acre, 2.0-acre, and 5.0-acre project site in SRA 3 with sensitive receptors located within 25 meters of the project site.

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

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

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

The Project proposes to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. Thus, the air quality analysis addresses the potential development of up to four amenity hotels with up to 450 rooms along arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City.

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. As part of its enforcement responsibilities, the United States Environmental Protection Agency (USEPA) requires that each state with nonattainment areas prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the California Clean Air Act (CCAA) requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the federal and State ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

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

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

- **Consistency Criterion No. 1**: A proposed project would not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of the AQMP's air quality standards or the interim emissions reductions.

- **Consistency Criterion No. 2**: A proposed project would not exceed the AQMP's assumptions or increments based on the years of the project build-out phase.

Consistency Criterion No. 1 refers to the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). As shown in Tables 4.3-3 and 4.3-4, the proposed Project construction and operational emissions would be below SCAQMD's thresholds. As the Project would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance, the Project would not violate any air quality standards. Thus, no impact is expected, and the Project would be consistent with the first criterion.

Consistency Criterion No. 2 refers to SCAG's growth forecasts and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities located within the SCAG region. The 2012 and 2016 AQMPs were prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Therefore, projects that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

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

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

As discussed in Chapter 2.0, Project Description, the Project proposes a General Plan Amendment to amend the Land Use Plan for the General Commercial and Industrial designations to allow for an increased FAR for specific uses or zones. The Project also proposes additional amendments to the Zoning Code, which include minor clean-up language, including to uses permitted within the C-3 zone in order to more accurately reflect uses that occur and are permitted within the City; no new permitted uses other than amenity hotels are proposed, and to increase the height limit for the C-3 zone, which was inadvertently omitted during earlier code changes that increased the height limit for the C-2 and C-4 zones. As previously noted, although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. Specifically, the Project assumes the potential development of up to four amenity hotels with up to 450 rooms along arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City.

As discussed in Section 4.14, *Population and Housing*, development of amenity hotels would increase local employment opportunities during construction and operation. Although unlikely, potential employment opportunities could directly increase the City's population, as employees (and their families) may choose to relocate to the City. Four amenity hotels with up to 450 rooms are anticipated to generate approximately 360 employees.[4] It should be noted that estimating the number of future employees who would choose to relocate to the City would be highly speculative since many factors influence personal housing location decisions (i.e., family income levels and the cost and availability of suitable housing in the local area). Further, amenity hotels do not typically provide employment opportunities that involve substantial numbers of people needing to permanently relocate to fill the positions, but rather would provide employment opportunities to people within the local community and surrounding areas. Assuming 360 new employees (and their families) relocate to Gardena, Project implementation would result in a potential population increase of approximately 1,019 persons.[5] This is a conservative assumption, as it assumes all employees would relocate to the City along with their families instead of the more likely scenario of existing Gardena or other nearby residents to fill some of the new employment opportunities.

[4] Based on the World Tourist Organization recommended staffing rate of 8 persons per 10 rooms for similar type hotels.

[5] Based upon an average household size of 2.83 persons per household per the State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State – January 1, 2011-2020*, Sacramento, California, May 2020.

The forecast population growth would increase the City's existing (2020) population of 60,937 persons by approximately 1.7 percent to 61,956 persons.[6] The Gardena General Plan anticipates a population of 63,799 persons at buildout. Thus, the Project would be within the population projections anticipated and planned for by the City's General Plan and would not induce substantial unplanned population growth in the area.

The Gardena General Plan anticipated an increase in jobs within the City associated with the development of employment-generating land uses. More specifically, the Gardena General Plan anticipates an increase of approximately 4,700 jobs in the City between 2005 and 2025, resulting in approximately 39,400 jobs by 2025. According to the Profile of the City of Gardena (2019), prepared by SCAG, in 2017 there were 29,405 jobs within the City.[7]

Potential development of four amenity hotels could provide approximately 360 new jobs within the City. The potential addition of 360 jobs would be within the growth projections anticipated by the Gardena General Plan (39,400 jobs by 2025). Thus, the Project would be within the growth projections anticipated and planned for by the City's General Plan and would not increase growth beyond the AQMP's projections.

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

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

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

Land use planning strategies set forth in the 2016 AQMP are primarily based on the 2016-2040 RTP/SCS. As discussed in Section 4.8, Greenhouse Gas Emissions, the Project would be consistent with the actions and strategies of the 2016-2040 RTP/SCS. For example, the Project would be consistent with the 2016-2040 RTP/SCS goal that focuses on new growth around transit by providing for the opportunity to develop employment-generating uses, which is served by frequent transit routes and providing commercial uses in proximity to existing residential and other commercial uses.

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

Mitigation Measures: No mitigation measures are required.

[6] State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State – January 1, 2011-2020*, Sacramento, California, May 2020.
[7] Southern California Association of Governments, *Profile of the City of Gardena, Local Profiles Report 2019*, May 2019, http://www.scag.ca.gov/Documents/Gardena.pdf, accessed August 27, 2020.

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

Less Than Significant Impact.

Construction Emissions

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

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

Construction-related emissions were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. For analysis purposes, it is assumed site preparation, grading, and building construction would begin in early 2021. Paving and architectural coating would occur in 2022. Although site-specific development is not currently proposed and the exact construction timeline is unknown, the early 2021 construction start date used in the modeling results in a conservative analysis because CalEEMod uses cleaner emissions factors in future years due to improved emissions controls and fleet turnover. This approach is conservative given that emissions factors are anticipated to decrease in future years due to regulatory and technological improvements and fleet turnover; refer to Appendix A, Air Quality/Energy/Greenhouse Gas Emissions Data, for additional information regarding the construction assumptions used in this analysis.

The Project was modeled to reflect development of 450 rooms within four separate amenity hotels. Modeling included a 5,000 square foot restaurant located next to one of the hotels, for consistency with the 1108 W. Street GPA & ZC Project.[8] All four amenity hotels were assumed in CalEEMod to be constructed simultaneously, for the sake of providing a more conservative estimate of daily maximum construction-related emissions.[9]

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

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

[8] The 1108 W. 141st Street GPA & ZC Project IS/MND analyzed the potential development of a 126-room hotel and 5,000 square foot restaurant on 2.0 acres at the northeast corner of Rosecrans and Budlong Avenues.

[9] The amenity hotels would be developed based on market conditions; it is anticipated that each of the amenity hotel sites would be developed separately. Therefore, maximum daily construction-related emissions would likely be substantially lower than disclosed within this document, which assumes that each hotel would be developed at the same time.

related emissions beyond what is shown in Table 4.3-3. Project emissions would not worsen ambient air quality, create additional violations of federal and state standards, or delay SCAB's goal for meeting attainment standards. Impacts associated with construction emissions would be less than significant.

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

Construction Year	Reactive Organic Gases (ROG)	Nitrogen Oxides (NOx)	Carbon Monoxide (CO)	Sulfur Oxides (SOx)	Coarse Particulates (PM_{10})	Fine Particulates ($PM_{2.5}$)
2021	4.0	40.6	30.5	<0.1	8.2	5.2
2022	41.1	26.4	29.3	<0.1	4.6	1.8
SCAQMD Threshold	**75**	**100**	**550**	**150**	**55**	**150**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Source: CalEEMod version 2016.3.2.						
Notes: SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment; refer to Appendix A for model outputs.						

Operational Emissions

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

CalEEMod was also used to calculate pollutants emissions from vehicular trips generated from the amenity hotels. CalEEMod default inputs for vehicle mix and trip distances were unaltered for this analysis. CalEEMod estimated emissions from Project operations are summarized in Table 4.3-4, *Operational-Related Emissions (Unmitigated Maximum Pounds Per Day)* and Table 4.3-5, *Operational-Related Emissions (Mitigated Maximum Pounds Per Day*. Operational-related mitigation incorporates the reduction in VMT associated with the mitigation designed to reduce VMT per employee from 15.12 to 14.65 VMT per employee, as described in the transportation memorandum prepared by Kittelson & Associates. Note that emissions rates differ from summer to winter because weather factors are dependent on the season and these factors affect pollutant mixing, dispersion, ozone formation, and other factors.

As shown in Table 4.3-4 and Table 4.3-5, emission calculations generated from CalEEMod demonstrate that Project operations would not exceed the SCAQMD thresholds for any criteria air pollutants. Therefore, Project operational impacts would be less than significant.

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

Source	Reactive Organic Gases (ROG)	Nitrogen Oxides (NOx)	Carbon Monoxide (CO)	Sulfur Oxides (SOx)	Coarse Particulates (PM_{10})	Fine Particulates ($PM_{2.5}$)
Summer Emissions						
Area Source	14.7	<0.1	<0.1	0	<0.1	<0.1
Energy	0.7	6.4	5.3	<0.1	0.5	0.5
Mobile	8.8	38.8	91.8	0.3	24.6	6.8
Total	**24.2**	**45.2**	**97.2**	**0.4**	**25.1**	**7.2**
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Winter Emissions						
Area Source	14.7	<0.1	<0.1	0	<0.1	<0.1
Energy	0.7	6.4	5.3	<0.1	0.5	0.5
Mobile	8.5	39.3	89.4	0.3	24.6	6.8
Total	**23.9**	**45.7**	**94.8**	**0.3**	**25.1**	**7.2**
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Source: CalEEMod Version 2016.3.2; refer to Appendix A for model outputs.						

Table 4.3-5
Operational-Related Emissions (Mitigated Maximum Pounds Per Day)

Source	Reactive Organic Gases (ROG)	Nitrogen Oxides (NOx)	Carbon Monoxide (CO)	Sulfur Oxides (SOx)	Coarse Particulates (PM_{10})	Fine Particulates ($PM_{2.5}$)
Summer Emissions						
Area Source	14.7	<0.1	<0.1	0	<0.1	<0.1
Energy	0.7	6.4	5.3	<0.1	0.5	0.5
Mobile	8.7	38.3	89.5	0.3	23.8	6.5
Total	**24.1**	**44.6**	**94.9**	**0.3**	**24.3**	**7.0**
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Winter Emissions						
Area Source	14.7	<0.1	<0.1	0	<0.1	<0.1
Energy	0.7	6.4	5.3	<0.1	0.5	0.5
Mobile	8.4	38.7	87.3	0.3	23.8	6.5
Total	**23.8**	**45.1**	**92.7**	**0.3**	**24.3**	**7.0**
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Source: CalEEMod Version 2016.3.2; refer to Appendix A for model outputs.						

Area Source Emissions

Area source emissions would be generated due to consumer products, architectural coating, and landscaping associated with the sites. As shown in Table 4.3-5, the Project's area source emissions would not exceed SCAQMD thresholds for either the winter or summer seasons. Therefore, impacts would be less than significant and mitigation measures would not be required.

Energy Source Emissions

Energy source emissions would be generated due to the Project's electricity and natural gas usage. The Project's primary uses of electricity and natural gas would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. As shown in Table 4.3-5, the Project's energy source emissions would not exceed SCAQMD thresholds for criteria pollutants. As such, the Project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. Therefore, the Project's operational air quality impacts would be less than significant.

Mobile Source

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

Project-generated vehicle emissions have been estimated using CalEEMod, as recommended by the SCAQMD. As shown in Table 4.3-5, mobile source emissions would not exceed SCAQMD thresholds for criteria pollutants. Therefore, the Project's air quality impacts associated with mobile source emissions would be less than significant.

Cumulative Short-Term Emissions

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

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

Cumulative Long-Term Impacts

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

As shown in Table 4.3-5, the Project's operational emissions would not exceed SCAQMD thresholds. As a result, the Project's operational emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. This is a less than significant impact.

Mitigation Measures: No mitigation measures are required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Localized Construction Significance Analysis

To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific emissions.

The maximum daily disturbed acreage is estimated to be 4.44 acres[10]. The appropriate SRA for the LSTs is the Southwest Coastal LA County area (SRA 3), since SRA 3 includes the City of Gardena. LSTs apply to CO, NO_2, PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5.0 acres. As stated, Project construction is anticipated to disturb a maximum of 4.44 acres in a single day, which is a conservative assumption.

Amenity hotels could be developed on sites of a minimum of 0.5-acre on arterials and major collector streets within with the C-3, C-4, M-1 and M-2 zones. Although it is anticipated that one of the sites for a potential amenity hotel would be located at 1108 W. 141st Street, the exact location of development of the other three amenity hotels is unknown at this time. For purposes of the analysis, the worst-case assumption for the location of the nearest sensitive receptor (i.e., within 25 meters of a project site) was utilized.

[10] This assumes each site is approximately 1.11 acres, which is the approximate acreage associated with the hotel component of the 1108 W. 141st GPA & ZC Project. This is a conservative assumption since amenity hotels could be developed on a 0.50-acre site and would involve less site disturbance when compared to a 1.11-acre site and it is not likely that four amenity hotels would be developed at the same time.

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, as recommended by the SCAQMD, LSTs for receptors located at 25 meters were utilized in this analysis for receptors closer than 25 meters. Table 4.3-6, *Localized Significance of Construction Emissions (Maximum Pounds per Day)*, presents the results of localized emissions during construction.

As shown in Table 4.3-6, the emissions of these pollutants on the peak day of construction would not result in significant concentrations of pollutants at nearby sensitive receptors. In addition, specific development projects would be subject to compliance with SCAQMD Rules 402, 403, and 1113, which would further reduce specific construction-related emissions. Therefore, the proposed Project would result in a less than significant impact concerning LSTs during construction activities.

Table 4.3-6
Localized Significance of Construction Emissions (Maximum Pounds Per Day)[1]

Construction Activity	Nitrogen Oxides (NO_x)	Carbon Monoxide (CO)	Coarse Particulates (PM_{10})	Fine Particulates ($PM_{2.5}$)
Site Preparation (2021)	40.5	21.2	8.0	5.2
Grading (2021)	24.7	15.9	3.3	2.2
Building Construction (2021)	17.4	16.6	1.0	0.9
Building Construction (2022)	15.6	16.4	0.8	0.8
Paving (2022)	11.1	14.6	0.6	0.5
Architectural Coating (2022)	1.4	1.8	0.1	0.1
SCAQMD Localized Screening Thresholds (5 acres at 25 meters)	197	1,796	15	8
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Source: CalEEMod Version 2016.3.2; refer to Appendix A for model outputs.				
Notes: 1. Emissions reflect on-site construction emissions only, per SCAQMD guidance.				

Localized Operational Significance Analysis

The on-site operational emissions are compared to the LST thresholds in Table 4.3-7, *Localized Significance of Operational Emissions (Maximum Pounds per Day)*. Table 4.3-7 shows that the maximum daily emissions of these pollutants during operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, the proposed Project would result in a less than significant impact concerning LSTs during operational activities.

Table 4.3-7
Localized Significance of Operational Emissions (Maximum Pounds Per Day)

Emission Sources	Nitrogen Oxides (NO_x)	Carbon Monoxide (CO)	Coarse Particulates (PM_{10})	Fine Particulates ($PM_{2.5}$)
On-Site Emissions (Area Sources)	<0.1	<0.1	<0.1	<0.1
SCAQMD Localized Screening Threshold (5 acres at 25 meters)	197	1,796	4	2
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Source: CalEEMod version 2016.3.2; refer to Appendix A for model outputs.				

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

Criteria Pollutant Health Impacts

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

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

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

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

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

As previously discussed, Project emissions would be less than significant and would not exceed SCAQMD thresholds; refer to Table 4.3-3, Table 4.3-4, and Table 4.3-5. Localized effects of on-site Project emissions on nearby receptors were also found to be less than significant; refer to Table 4.3-6 and Table 4.3-7. The LSTs represent the maximum emissions from a Project that are not expected to cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations such as asthmatics, children, and the elderly. As shown above, Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels more than the health-based ambient air quality standards.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service of an intersection resulting from the proposed Project would have the potential to result in exceedances of the

CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. The 2016 AQMP is the most recent version that addresses CO concentrations. As part of the SCAQMD CO Hotspot Analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with approximately 100,000 average daily traffic trips (ADT), was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm Federal standard. The potential development of up to four amenity hotels with 450 rooms would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's CO Hotspot Analysis. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 ADT, it can be reasonably inferred that CO hotspots would not be experienced at any Project area intersections from the net new ADT attributable to the proposed Project. Therefore, impacts would be less than significant.

Construction-Related Diesel Particulate Matter

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

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment would dissipate rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities.

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

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact.

Construction

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

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

During construction, emissions from construction equipment, such as diesel exhaust, and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be temporary, are not expected to affect a substantial number of people and would disperse rapidly. Therefore, impacts related to odors associated with potential construction-related activities would be less than significant.

Operational

The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project does not propose or allow for land uses with the potential to generate significant sources of odors beyond existing conditions. Amenity hotels would involve the types of uses that would emit objectionable odors affecting substantial numbers of people. Therefore, the proposed Project would not create objectionable odors and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.4 Biological Resources

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

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

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

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

Less Than Significant Impact. According to the Gardena General Plan EIR, the City of Gardena is highly urbanized and is not known to support any significant wildlife or native planning communities or species. There is an approximately eight-acre site located north of the commercial development at the northwest corner of Artesia Boulevard and Vermont Avenue, known as the Gardena Willows Wetland Preserve. The area is designated as Open Space by the Gardena General Plan land use map. In April 1999 the City of Gardena adopted *A Plan for the Gardena Willows Wetland* (Plan). According to a biological assessment conducted to prepare the Plan, the vegetation of the Willows consists of herbaceous annual and perennial herbs and grasses, annual aquatic herbs, long-lived perennial herbs and shrubs, and trees. The wildlife of the Willows consists of resident, migratory and visitor birds, mammals, reptiles, amphibians, and terrestrial and aquatic invertebrates. The Plan identifies four principal vegetative communities and wildlife habitats of the Willows and indicates special-status wildlife species were observed in the area. The Plan provides a comprehensive guide for preserving and enhancing the Willows Wetland's environmental integrity and quality.

The proposed amendments to the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code would not result in any changes to the Open Space land use designation, the Willows Wetland Preserve, or to the Plan adopted for preservation of the Willows Wetland.

As stated, the proposed General Plan and Zoning Code amendments do not involve site-specific development. The intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. More specifically, the environmental analysis addresses the potential development of up to four amenity hotels with up to 450 rooms along arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City. Thus, development of an amenity hotel would not occur within Open Space-designated land. Further, development would not directly impact the Willow Wetland Preserve.

Although development of an amenity hotel would not occur within the Willows Wetland Preserve, there are parcels on Artesia Boulevard zoned C-3 that are adjacent to the Preserve, which could be developed with an amenity hotel; refer to Exhibit 4.4-1, *Willows Wetland Preserve*. These parcels are currently developed with commercial uses and are in active use. Further, the parcels are adjacent to Artesia Boulevard and Vermont Avenue, which are highly traveled corridors within the City. Development of an amenity hotel would not significantly alter the existing conditions at the parcels, nor would it introduce significant new noise or lighting to the area with the potential to impact the preserve. Any future development near the Willows Wetland Preserve would be required to comply with the General Plan goal and policies to preserve and enhance the Willows Wetlands and to protect its natural resources. Thus, the Project would not have a substantial adverse effect, either directly or through habitat modifications, on

any special status plant or wildlife species, any riparian habitat or other sensitive natural community, or on any state or federally protected wetlands.

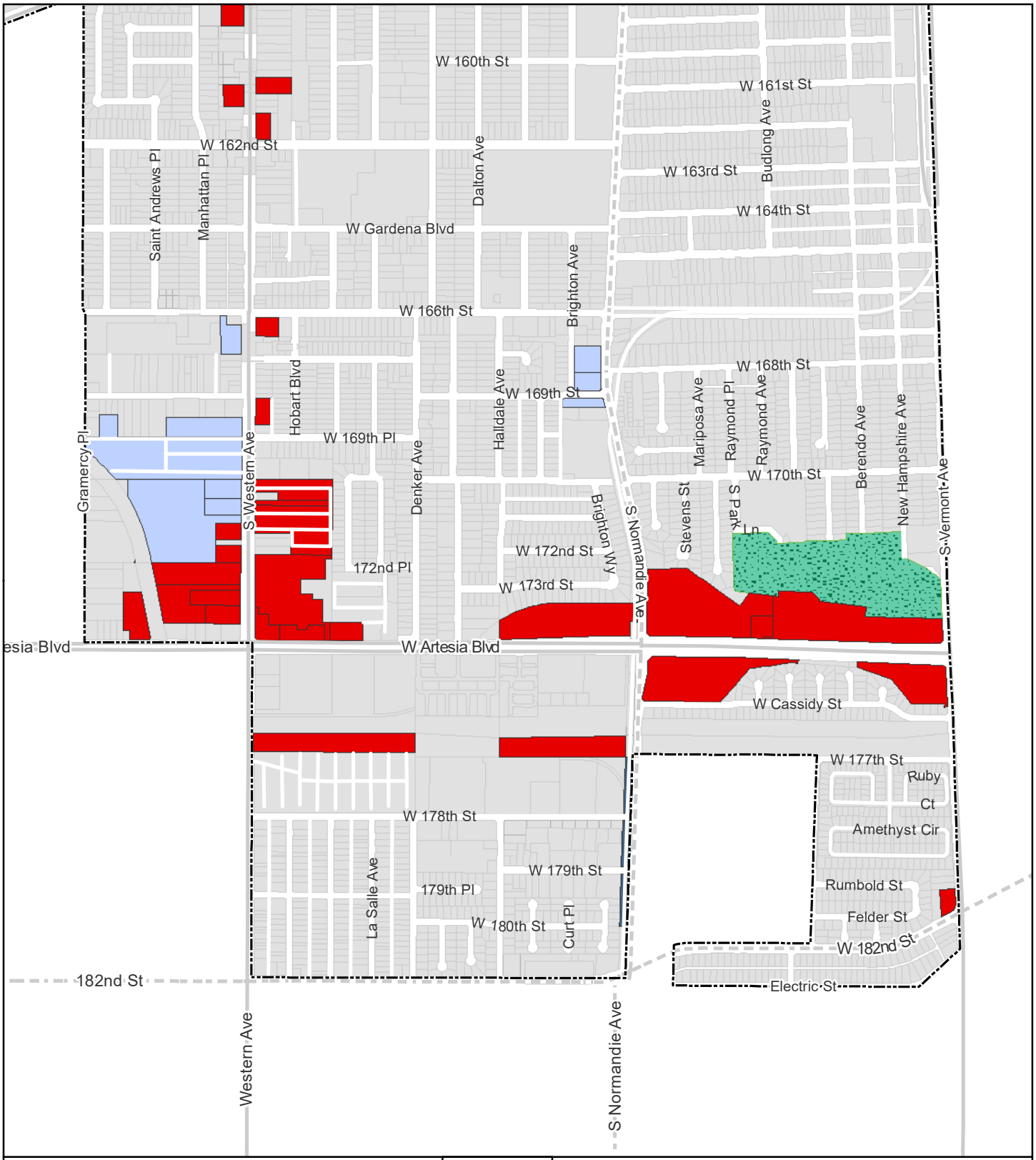
Mitigation Measures: No mitigation measures are required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact With Mitigation Incorporated. As stated, although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. It is possible that specific properties proposed for development of an amenity hotel could include trees with the potential to support nesting migratory birds that are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC). Construction activities or removal of the trees could potentially impact nesting migratory birds. Under MBTA provisions, it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any migratory birds except as permitted by regulations issued by the USFWS. The term "take" is defined by USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture or collect" any migratory bird or any part, nest or egg of any migratory bird covered by the conventions, or to attempt those activities. In addition, the CFGC extends protection to nonmigratory birds identified as resident game birds (CFGC Section 3500) and any birds in the orders Falconiformes or Strigiformes (birds-of-prey) (CFGC Section 3503). To address potential impacts to migratory birds, future development that would result in construction activities or removal of trees with the potential to support nesting migratory birds would be subject to compliance with Mitigation Measure BIO-1, which would require construction outside of the nesting season for migratory birds, or a pre-construction survey be conducted prior to initiating construction activities. If active nests are found, a Nesting Bird Plan would be required to be prepared and implemented. Implementation of Mitigation Measure BIO-1 would reduce potential impacts to nesting migratory birds to a less than significant level.

Mitigation Measures:

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



Legend

- Gardena City Limits
- Gardena Parcels
- Arterial Roads
- Major Collector Roads
- Gardena Willows Wetland Preserve

Possible Amenity Hotel Site by Zoning Designation

C3 M1 M2

Sources: Los Angeles County GIS; Gardena Zoning Map, January 2018. Date: October 20, 2020. Revised: January 11, 2021.

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CITY OF GARDENA
HOTEL DEVELOPMENT STANDARDS GENERAL PLAN AND ZONING CODE AMENDMENT PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Exhibit 4.4-1. Gardena Willows Wetland Preserve

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

Less Than Significant Impact. Refer to Response 4.4 (a-c) regarding the Plan adopted for preservation of the Gardena Willows Wetland.

Gardena Municipal Code Chapter 13.60, *Trees, Shrubs, and Plants*, regulates the placement and provides for the proper selection of new trees to minimize problems in public facilities, and establishes requirements for the preservation and proper maintenance of existing trees located on public property, as well as certain trees located on private property, that are deemed important to the general welfare and the benefit of the community. Section 13.60.080, *Permit*, requires a Trimming Permit, Tree Removal Permit, and/or a Tree Planting Permit for cutting, trimming, pruning, planting, removing, injuring or interfering with any tree, shrub or plant upon any Street or Public Place of the City. At this time, a specific development project is not proposed. If any development within the City, including an amenity hotel, proposes to remove a tree on public property, the request would be reviewed pursuant to Gardena Municipal Code Section 13.60.110, *Tree removal criteria*. Thus, the Project would not conflict with any local policies or ordinances protection biological resources.

Mitigation Measures: No mitigation measures are required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant Impact. Refer to Response 4.4 (a-c) regarding the Plan adopted for preservation of the Gardena Willows Wetland. The Project would not conflict with *A Plan for the Gardena Willows Wetland.* The City of Gardena is not located within the boundaries of an adopted Habitat Conservation Plan or Natural Community Conservation Plan. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.5 Cultural Resources

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

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

Less Than Significant Impact with Mitigation Incorporated. According to the General Plan EIR, the City conducted a citywide historical resources survey and identified 111 sites that would give a balance of the history and culture of the City. The report recommended that six sites be nominated to the National Register of Historic Places; however, the survey was never adopted and many of the sites have since been demolished.

The proposed amendments to the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code would not cause a substantial change in the significance of a historical resource.

As stated, the proposed General Plan and Zoning Code amendments do not involve site-specific development. The intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. The environmental analysis addresses the potential development of up to four amenity hotels with up to 450 rooms along arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City. It is possible that future development of an amenity hotel could be proposed on or adjacent to a site that is developed with a potential historic resource. Development within the City is required to comply with the General Plan policies, including Policy LU 4.5, which encourages the preservation of historical and cultural locations and monuments that highlight the heritage of the City.

As site-specific development is not currently proposed, future development of an amenity hotel would be required to comply with Mitigation Measure CUL-1 to ensure that potential historical resources are properly identified and that the proposed development would not cause a substantial change in the significance of a historical resource. With implementation of Mitigation Measure CUL-1, potential impacts to historical resources would be reduced to a less than significant level.

Mitigation Measures:

CUL-1 Future development of an amenity hotel on a property with a potential historical resource, shall require a Historic Resources Assessment prepared by a qualified professional, which shall be submitted to the City of Gardena Community Development Department for review and approval. The Historic Resource Assessment shall determine whether the resource(s) is potentially historic and if the proposed project would potentially cause a substantial adverse change to the historical resource. Feasible measures shall be identified in order to mitigate the known and potential significant effects of the subject development project, if any.

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

Less Than Significant Impact. According to the General Plan EIR, recovery of significant archaeological resources is unlikely due to the extensive grading and development that has occurred within the City. In addition, the records searches conducted specific to the 1108 W. 141st Street site indicated that no archaeological or tribal cultural resources have been previously recorded within the area and the potential for prehistoric or historic resource deposits within the site is considered to be low.[11]

The proposed amendments to the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code would not cause a substantial change in the significance of an archaeological resource.

As stated, site-specific development is not currently proposed. The environmental analysis addresses the potential development of up to four amenity hotels with up to 450 rooms along arterials and major collector streets within the C-3, C-4, M-1, and M-2 zones of the City. Most of the parcels meeting the requirements for amenity hotels are currently developed or have been developed in the past and therefore are not anticipated to contain archaeological resources.

However, there is the potential for future development of an amenity hotel to affect previously unidentified cultural or tribal cultural resources. In the event future development of an amenity hotel results in the accidental discovery of archaeological resources during ground-disturbing activities, Condition of Approval (COA) CUL-1 would require construction work to halt until a qualified archaeologist can evaluate the find and if determined to be a "historical resource" or "unique archaeological resource", implementation of avoidance measures or appropriate mitigation would be required. With implementation of COA CUL-1, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 and impacts would be less than significant.

COA CUL-1 If previously unidentified cultural resources are encountered during ground disturbing activities, construction activities shall cease in the immediate vicinity and construction activities shall be diverted away from the find (50-foot buffer around the find) and a qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, shall be contacted immediately to evaluate the

[11] Cogstone, *Cultural and Paleontological Resources Assessment for the 1108 West 141st Street Project, City of Gardena, Los Angeles County, California,* August 2020.

find. If the discovery proves to be significant under CEQA, the treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. In the event that an identified cultural resource is of Native American origin, the qualified archaeologist shall consult with the Project owner and City of Gardena to implement Native American consultation procedures.

Mitigation Measures: No mitigation measures are required.

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

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

If human remains are found, the remains would require proper treatment in accordance with applicable laws, including State of California Health and Safety Code Sections 7050.5-7055 and Public Resources Code Section 5097.98 and Section 5097.99. Health and Safety Code Sections 7050.5-7055 describe the general provisions for treatment of human remains. Specifically, Health and Safety Code Section 7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during excavation of a site. Health and Safety Code Section 7050.5 also requires that all activities cease immediately, and a qualified archaeologist and Native American monitor be contacted immediately. As required by State law, the procedures set forth in Public Resources Code Section 5087.98 would be implemented, including evaluation by the County Coroner and notification of the NAHC. The NAHC would designate the “Most Likely Descendent” of the unearthed human remains. If human remains are found during excavation, excavation would be halted near the find and any area that is reasonably suspected to overlay adjacent remains shall remain undisturbed until the County Coroner has investigated, and appropriate recommendations have been made for treatment and disposition of the remains. Following compliance with the established regulatory framework (Health and Safety Code Sections 7050.5-7055 and Public Resources Code Section 5097.98 and Section 5097.99), the Project’s potential impacts concerning human remains would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.6 Energy

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

REGULATORY FRAMEWORK

California Building Energy Efficiency Standards (Title 24)

The 2019 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2020. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Title 24 standards require installation of energy efficient windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

California Green Building Standards (CALGreen)

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

Senate Bill 100

Senate Bill (SB) 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy

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

City of Gardena Climate Action Plan

The City of Gardena, in cooperation with the South Bay Cities Council of Governments (SBCCOG), developed the City of Gardena Climate Action Plan (CAP) (December 2017) to reduce GHG emissions within the City. The CAP serves as a guide for action by setting GHG emission reduction goals and establishing strategies and policy to achieve desired outcomes over the next 20 years. The CAP includes a GHG emissions inventory as well as the following reduction targets for community-wide emissions: 15 percent of 2005 levels by 2020 and 49 percent of 2005 levels by 2035. The CAP outlines GHG reduction measures for various sectors, including Land Use and Transportation (LUT), Energy Efficiency (EE), Solid Waste (SW), Urban Greening (UG), and Energy Generation and Storage (EGS). Reduction measures include accelerating the market for electric vehicles, encouraging alternative transportation choices, increasing energy efficiency in existing buildings, reducing energy consumption, increasing solid waste diversion, and supporting energy generation in the community.

The Project proposes to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. Thus, the energy analysis addresses the potential development of up to four amenity hotels with up to 450 rooms along arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

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

The amount of energy used at the site of an amenity hotel would directly correlate to the size of the structures, the energy consumption of appliances, and outdoor lighting. Other major sources of Project

energy consumption include fuel used by vehicle trips generated during Project construction and operation, and fuel used by off-road construction vehicles during construction.

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

Electricity and Natural Gas

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

Table 4.6-1
Project Operational Natural Gas and Electricity Usage

Emissions	Project Annual Consumption	Los Angeles County Annual Consumption	Percent Increase
Natural Gas Consumption (therms)	236,756	2,921,000,000	0.0081%
Electricity Consumption (MWh/year)	6,089	68,486,000	0.0089%
Sources: CalEEMod version 2016.3.2; California Energy Commission, Electricity Consumption by County; Natural Gas Consumption by County.			

CalEEMod uses the California Commercial End Use Survey (CEUS) database to develop energy intensity value for non-residential buildings. As shown in Table 4.6-1, Project operational natural gas usage would be a 0.0089 percent increase above the County's typical annual electricity consumption, and an approximate 0.0081 percent increase above the county's typical natural gas consumption. These increases are minimal in the context of the county as a whole.

On-Road Vehicles (Operation)

Amenity hotels would generate vehicle trips during their operational phase. In order to calculate operational on-road vehicle energy usage and emissions, default trip lengths generated by CalEEMod (version 2016.3.2) were used, which are based on the Project location and urbanization level parameters selected within CalEEMod; refer to Appendix A. Based on fleet mix data provided by CalEEMod and Year 2022 gasoline and diesel miles per gallon (MPG) factors for individual vehicle classes as provided by EMFAC2017, a weighted MPG factor for operational on-road vehicles of approximately 25.5 MPG for gasoline vehicles were derived. Therefore, the Project would generate vehicle trips that would use approximately 1,192 gallons of gasoline per day or 434,944 gallons of gasoline per year; refer to Appendix A.

On-Road Vehicles (Construction)

The Project would also generate on-road vehicle trips during Project construction (from construction workers and vendors). Estimates of vehicle fuel consumed were derived based on the assumed construction schedule, vehicle trip lengths and number of workers per construction phase as provided by CalEEMod, and Year 2020 gasoline MPG factors provided by EMFAC2017. It was assumed that all vehicles

would use gasoline as a fuel source (as opposed to diesel fuel or alternative sources). Table 4.6-2, *On-Road Mobile Fuel Generated by Project Construction Activities – By Phase*, describes gasoline and diesel fuel used by on-road mobile sources during each phase of the construction schedule. As shown, the vast majority of on-road mobile vehicle fuel used during the construction of amenity hotels would occur during the building construction phase.

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

Construction Phase	# of Days	Total Daily Worker Trips[1]	Total Daily Vendor Trips[1]	Total Hauler Trips[1]	Gallons of Gasoline Fuel[2]	Gallons of Diesel Fuel[2]
Site Preparation	10	18	0	0	98	0
Grading	20	15	0	0	163	0
Building Construction	230	277	108	0	34,710	27,410
Paving	20	15	0	0	163	0
Architectural Coating	150	55	0	0	4,495	0
			Total	**0**	**39,629**	**27,410**

Sources: CalEEMod Version 2016.3.2; EMFAC2017.

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

Off-Road Vehicles (Construction)

Off-road construction vehicles would use diesel fuel during the construction phase of development. Off-road construction vehicles expected to be used during the construction phase include, but are not limited to, cranes, forklifts, generator sets, tractors, excavators, and dozers. Based on the total amount of CO_2 emissions expected to be generated by the proposed Project (as provided by the CalEEMod output), and a CO_2 to diesel fuel conversion factor (provided by the U.S. Energy Information Administration), the Project would use up to approximately 4,247 gallons of diesel fuel for off-road construction vehicles during the site preparation and grading phases; refer to Appendix A for detailed calculations.

Conclusion

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

Potential amenity hotel development would be in compliance with all applicable federal, State, and local regulations regulating energy usage. For example, Southern California Edison (SCE) is responsible for the mix of energy resources used to provide electricity for its customers, and it is in the process of

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

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

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. Table 4.6-3, *Gardena Climate Action Plan Project Consistency Analysis*, provides an analysis of the Project's consistency with applicable policies in the *City of Gardena Climate Action Plan* (CAP), 2017. Future development of amenity hotels would be required to comply with the most recent version of CALGreen, which requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g., lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. As indicated in Table 4.6-3, the Project would be consistent with the measures identified in the City's CAP and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; impacts would be less than significant.

Table 4.6-3
Gardena Climate Action Plan Project Consistency Analysis

Gardena Climate Action Plan Measure	Consistency Analysis
Measure LUT: G1 – Increase Density	Consistent. The Project would encourage infill development of developed and/or underutilized sites with amenity hotel uses. The proposed Development Standards for amenity hotels would allow for increased intensity by allowing a minimal lot size of 0.5-acre and a FAR of up to 2.0.
Measure EE: B1 – Encourage or Require Energy Efficiency Standards Exceeding Title 24	Consistent. Future development of amenity hotels would be required to comply with the 2019 (or more current) version of the Title 24 CALGreen standards, which provide higher energy efficiency requirements as compared to the earlier version of Title 24 standards.
Measure EE: E1 – Promote or Require Water Efficiency Through SB X7-7	Consistent. Future development of amenity hotels would be required to comply with the 2019 (or more current) version of the Title 24 CALGreen standards, which include water efficiency standards the exceed the water efficiency requirements contained in previous versions of the Title 24 standards.
Source: City of Gardena Climate Action Plan, December 2017.	

Mitigation Measures: No mitigation measures are required.

4.7 Geology and Soils

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

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

1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). According to the General Plan EIR (Figure 6) and California Department of Conservation Data Viewer, an Alquist-Priolo Fault Zone, as defined by the State of California in the Earthquake Fault Zoning Act, traverses the northeastern-most corner of the City, near El Segundo Boulevard and Vermont Avenue.[12]

The Project proposes to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. There is a parcel zoned C-3 that could potentially be developed with an amenity hotel located within or near the Alquist Priolo Fault Zone. The General Plan and General Plan EIR includes General Plan Policy PS 2.4 and Mitigation Measure GEO-1, respectively, requiring that any development proposed within an Alquist-Priolo Fault Zone would be required to prepare site-specific geotechnical studies before any construction can occur. The intent of the mitigation measure from the 2006 EIR (and adopted Mitigation Monitoring and Reporting Program), which requires development projects, including those located within an Alquist-Priolo Fault Zone, to prepare a geotechnical investigation that evaluates soils, groundwater, geological and seismic conditions, and requires construction to be in compliance with the findings and recommendations of the required investigations, is now a standard requirement by the City. If an active fault is found on a property, structures generally would not be allowed to be constructed within 50 feet of the fault trace. Pursuant to Gardena Municipal Code Chapter 15.04, *General Building Provisions*, the City has adopted the 2019 California Building Standards Code (CBSC), subject to certain amendments and changes, including amendments specific to seismic conditions. Future development would be required to comply with all applicable regulations in the most recent CBSC as amended by the Gardena Municipal Code, which includes design requirements to mitigate the effects of potential hazards associated with seismic activity. The Gardena Building Services Division would review construction plans for compliance with the CBSC and Gardena Municipal Code, as well as the site-specific geotechnical study's recommendations. Thus, compliance with the City's established regulatory framework, Condition of Approval GEO-1, and standard engineering practices and design criteria, which would be verified through the City's construction plan review process, would ensure potential impacts associated with potential

[12] California Department of Conservation, *Data Viewer*, Department of Conservation Map Server (ca.gov), accessed December 4, 2020.

rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map would be reduced to a less than significant impact.

COA GEO-1: Prior to the submission of any new building permit application, as required by the City Building Official, the applicant shall provide for the City's review and consent, a comprehensive geotechnical investigation that explores and evaluates soil, groundwater, geological and seismic conditions; provides soil engineering criteria, and documents the potential for seismically induced ground shaking on the building site. Such investigations shall be conducted by a licensed civil engineer specializing in the practice of soil mechanics, and by a certified engineering geologist. Construction shall be in compliance with the findings and recommendations of the required investigations.

Mitigation Measures: No mitigation measures are required.

2) Strong seismic ground shaking?

Less Than Significant Impact. The City of Gardena is located in a seismically active area that has historically been affected by moderate to occasionally high levels of ground motion. As a result, during the life of any potential site development, it is likely the site would experience moderate to occasionally high ground shaking from nearby fault zones, as well as some background shaking from other seismically active areas of the southern California region. Therefore, development within the City could expose people or structures to potential adverse effects as a result of strong seismic ground shaking. The intensity of ground shaking would depend upon the earthquake's magnitude, distance to the epicenter, and geology of the area between the specific site and epicenter.

As stated, although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. Prior to development of an amenity hotel, the applicant would be required to conduct a site-specific geotechnical study to determine the geotechnical feasibility of the specific development being proposed at that time. Any recommendations presented in the geotechnical study would be required to be incorporated into the design and construction of the future development. The geotechnical study would include specific recommendations based on seismic design parameters for foundation design, retaining and screening walls, exterior flatwork, concrete mix design, corrosion, pavement design, and general earthwork and grading, among other factors. Further, design of any proposed structures in accordance with the current California Building Code is anticipated to adequately mitigate concerns with ground shaking.

As discussed above, the City has adopted the 2019 CBSC (Gardena Municipal Code Chapter 15.04), subject to certain amendments and changes, including amendments specific to seismic conditions. Future development would be required to comply with all applicable regulations in the most recent CBSC as amended by the Gardena Municipal Code, which includes design requirements to mitigate the effects of potential hazards associated with seismic ground shaking. The Gardena Building Services Division would review construction plans for compliance with the CBSC and Gardena Municipal Code, as well as the geotechnical study's recommendations. Thus, compliance with the City's established regulatory framework, COA GEO-1, and standard engineering practices and design criteria, which would be verified through the City's construction plan review process, would ensure potential impacts associated with strong seismic ground shaking would be reduced to a less than significant impact.

Mitigation Measures: No mitigation measures are required.

3) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. Engineering research of soil liquefaction potential indicates that generally three basic factors must exist concurrently in order for liquefaction to occur. These factors include:

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

According to the General Plan EIR (Figure 6) and California Department of Conservation Data Viewer, the area located along Artesia Boulevard and the Dominguez Flood Control Channel in the southern portion of the City is located within a liquefaction zone.

There are parcels within this area that could potentially be developed with an amenity hotel. Any development proposed within a liquefaction zone would be required to prepare site-specific geotechnical studies before any construction can occur. The City has adopted the 2019 CBSC (Gardena Municipal Code Chapter 15.04), subject to certain amendments and changes, including amendments specific to seismic conditions. Future development would be required to comply with all applicable regulations in the most recent CBSC as amended by the Gardena Municipal Code, which includes design requirements to mitigate the effects of potential hazards associated with seismic activity and seismic-related ground failure, including the potential for liquefaction. As discussed above, the Gardena Building Services Division would review construction plans for compliance with the CBSC and Gardena Municipal Code, as well as the site-specific geotechnical study's recommendations. Thus, compliance with the City's established regulatory framework, COA GEO-1, and standard engineering practices and design criteria, which would be verified through the City's construction plan review process, would ensure potential impacts associated with seismic-related ground failure, including liquefaction would be reduced to a less than significant impact.

Mitigation Measures: No mitigation measures are required.

4) Landslides?

No Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. Geologic hazards associated with landsliding are not anticipated within the City of Gardena, as the City is not located within an area identified by the California Geologic Survey as having potential for seismic slope instability.[13] The City and surrounding area are relatively flat and do not contain any landforms capable of experiencing landslides.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The City of Gardena and surrounding area are relatively flat. Grading and earthwork activities associated with future development of amenity hotels could expose soils to potential short-term erosion by wind and water. Gardena Municipal Code Chapter 8.70, *Stormwater and Runoff*

[13] Ibid.

Pollution Control, requires the reduction of pollutants being discharged to the waters of the U.S. through the elimination of non-stormwater discharges to the municipal stormwater system; elimination of the discharge of pollutants into the municipal storm drain system; reduction of pollutants in stormwater discharges to the maximum extent practicable; and protection and enhancement of the quality of the waters of the U.S. consistent with the provisions of the Clean Water Act. Gardena Municipal Code Section 8.70.110, *Pollutant source reduction*, requires construction projects that disturb one or more acres of soil by grading, clearing, and/or excavating or other activities to obtain a general construction activity stormwater permit (GCAWSP) from the State Water Resources Control Board prior to issuance of a grading permit. Projects that disturb less than one acre of soil are required to comply with the minimum BMPs to reduce the discharge of construction-related pollutants to the municipal separate storm sewer system (MS4). The type of BMPs required shall be based on such factors as the amount of soil disturbed, the types of pollutants used or stored at the site, and proximity to water bodies. Erosion control plans may be required at the discretion of the City. If required, the project applicant must submit an erosion control plan to the City for approval as a condition for grading permit issuance. Therefore, construction activities would be required to comply with the erosion and siltation control measures of the GCAWSP, reducing potential impacts associated with soil erosion or the loss of topsoil during construction activities to a less than significant level.

Additionally, in accordance with the Gardena Municipal Code Section 8.70.110, *Pollutant source reduction*, new development and redevelopment projects would be required to comply with post-construction runoff pollution reduction Best Management Practices (BMPs) implemented through the Standard Urban Water Management Plan (SUSMP). SUSMP conditions assigned by the City include low impact development (LID) BMPs; source control BMPs; and structural and nonstructural BMPs for specific types of uses. Development would be required to implement BMPs to ensure proposed improvements, including ensuring any proposed landscaped areas would be maintained and properly irrigated to reduce the amount of potential soil erosion or the loss of top soil. Following compliance with the established regulatory framework identified in the Gardena Municipal Code regarding stormwater and runoff pollution control, potential impacts associated with soil erosion and the loss of topsoil would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

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

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

As stated, prior to development of any site with an amenity hotel, the applicant would be required to prepare a geotechnical study to determine the geotechnical feasibility of the specific development being proposed at that time. Any recommendations presented in the geotechnical study would be required to be incorporated into the design and construction of the proposed development. The geotechnical study would include specific recommendations based on seismic design parameters for foundation design, retaining and screening walls, exterior flatwork, concrete mix design, corrosion, pavement design, and general earthwork and grading, among other factors.

Development of an amenity hotel would be required to comply with all applicable regulations in the most recent CBSC as amended by the Gardena Municipal Code. The Gardena Building Services Division would review construction plans for compliance with the CBSC and Gardena Municipal Code, as well as the geotechnical study's recommendations. Thus, compliance with the City's established regulatory framework, CAO GEO-1, and standard engineering practices and design criteria, which would be verified through the City's construction plan review process, would ensure potential impacts associated with a geologic unit or soil that is unstable or would become unstable, including expansive soil conditions would be reduced to a less than significant impact.

Mitigation Measures: No mitigation measures are required.

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

No Impact. Development of an amenity hotel within the City would be required to connect to the City's existing sewer system and would not involve the use of septic tanks or alternative wastewater disposal systems.

Mitigation Measures: No mitigation measures are required.

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

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

Areas within the City, including the 1108 W. 141st Street GPA & ZC site, have been mapped entirely as middle to late Pleistocene older alluvium which was deposited between 500,000 and 11,700 years ago. These fluvial and flood plain deposits consist of layered poorly sorted, moderately well-indurated, slightly dissected, gravels to clays. The sediments were deposited by streams and rivers on canyon floors and in the flat flood plains of the area. Additionally, according to the Cultural and Paleontological Resources Assessment for the 1108 W. 141st Street Project, records searches have recorded paleontological localities producing vertebrate fossils within proximity to the Project area. Extinct megafauna from these sites include ground sloth (†Paramylodon sp.), mastodon (†Mammut sp.) mammoth (†Mammuthus sp.), dire wolf (†Canis dirus), horse (†Equus sp.), two types of pronghorn antelope (†Capromeryx sp., †Breameryx sp.), camel (†Camelidae), and bison (†Bison sp.; Table 2). All of the fossils were a minimum of five feet deep in deposits mapped as late Pleistocene at the surface, while sediments with a Holocene component produced fossils starting at 11 feet deep.[14]

A multilevel ranking system was developed by professional resource managers within the Bureau of Land Management (BLM) as a practical tool to assess the sensitivity of sediments for fossils. The Potential Fossil

[14] Cogstone, *Cultural and Paleontological Resources Assessment for the 1108 West 141st Street Project, City of Gardena, Los Angeles County, California,* August 2020.

Yield Classification (PFYC) system has a multi-level scale based on demonstrated yield of fossils. The PFYC system provides additional guidance regarding assessment and management for different fossil yield rankings. Fossil resources occur in geologic units (e.g., formations or members). The probability for finding significant fossils in a project area can be broadly predicted from previous records of fossils recovered from the geologic units present in and/or adjacent to the study area. The geological setting and the number of known fossil localities help determine the paleontological sensitivity according to PFYC criteria.

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

Fossils previously recovered within a 10-mile radius were a minimum of five feet deep in deposits mapped as late Pleistocene at the surface. Sediments with a Holocene component produced fossils starting at five feet deep. As such sediments less than five feet below the modern surface are assigned a low potential for fossils (PFYC 2) due to the lack of fossils in these deposits. Sediments more than five feet below the modern surface are assigned a moderate potential for fossils (PFYC 3) due to similar deposits producing fossils at that depth near to the area.

As stated, although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. Therefore, the environmental analysis assumes that one amenity hotel with up to 126 rooms would be developed at the northeast corner of Rosecrans and Budlong Avenues (1108 W. 141st Street GPA & ZC Project) and the remaining three amenity hotels would occur on arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City in accordance with the proposed amenity hotel development standards. The exact location and specific development characteristics of each of the amenity hotels are not known, as site-specific development proposals are not currently proposed.

Because areas of the City have been mapped as middle to late Pleistocene older alluvium, and fossils have been recovered within a 10-mile radius in deposits mapped as late Pleistocene at the surface, it is reasonable to infer that sites within the City that could be developed with amenity hotels may contain middle to late Pleistocene older alluvium sediments with the potential for fossils. If development of an amenity hotel would occur on a site mapped as late Pleistocene at the surface and excavation activities would occur at a depth greater than five feet into native sediments, Mitigation Measures GEO-1 would require a paleontological monitor to be at the site during ground disturbances occurring greater than 5.0 feet below the historic surface elevation in native sediments. Additionally, Condition of Approval (COA) GEO-2 would require Working Awareness and Environmental Program (WEAP) Training by a qualified vertebrate paleontologist for construction personnel involved in ground disturbing activities and COA GEO-3 would address potential impacts to paleontological resources that may be discovered during ground disturbing activities. COA GEO-3 details the appropriate steps in the event paleontological resources are encountered during ground disturbing activities, including the requirement for all work within a 25-foot radius of a find to be halted and a professional vertebrate paleontologist be contacted to evaluate the find. The significance of the find would be evaluated and if determined to be significant, the paleontologist would determine any additional work, such as data recovery excavation, that would be

warranted, prior to construction activities resuming. With the implementation of Mitigation Measure GEO-1 and COA GEO-2 and GEO-3, the potential for the future development of an amenity hotel to directly or indirectly destroy a unique paleontological resource or site of unique geologic feature would be reduced to less than significant.

COA GEO-2: If excavation activities associated with the development of an amenity hotel would occur on any site mapped as middle to late Pleistocene older alluvium at the surface, prior to commencement of ground-disturbing activities a qualified vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall develop Worker Awareness and Environmental Program (WEAP) Training for construction personnel. This training shall be presented to construction personnel and include what fossil remains may be found within the Project area and policies and procedures that must be followed in case of a discovery. Verification of the WEAP Training shall be provided to the Gardena Community Development Department.

COA GEO-3: If fossils or fossil bearing deposits are encountered during ground-disturbing activities, work within a 25-foot radius of the find shall halt and the professional vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall be contacted immediately to evaluate the find. The paleontologist shall have the authority to stop or divert construction, as necessary. Documentation and treatment of the discovery shall occur in accordance with Society of Vertebrate Paleontology standards. The significance of the find shall be evaluated pursuant to the State CEQA Guidelines. If the discovery proves to be significant, before construction activities resume at the location of the find, additional work such as data recovery excavation may be warranted, as deemed necessary by the paleontologist.

Mitigation Measures:

GEO-1: If excavation activities associated with the development of an amenity hotel would occur at a depth of greater than five feet on any site mapped as middle to late Pleistocene older alluvium at the surface, paleontological resources monitoring by a qualified vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall be required during ground disturbances greater than 5.0 below the historic surface elevation in native sediments. Auguring, potholing, and pile driving activities do not need to be monitored as these activities are unlikely to produce significant fossil because information about formation, depth, or context is impossible to discern. Should similar activities be planned, the qualified paleontologist shall be consulted prior to commencement so they may determine if that activity requires monitoring.

4.8 Greenhouse Gas Emissions

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

Existing Setting

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

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

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

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

As the name implies, global climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern, respectively. California produced 424 million gross metric tons of carbon dioxide equivalents ($MMTCO_2e$) in 2019 (California Energy Commission, 2019). Given that the U.S. EPA estimates that worldwide emissions from human activities totaled nearly 46 billion gross metric tons of carbon dioxide equivalents ($BMTCO_2e$) in 2010, California's incremental contribution to global GHGs is approximately 2% (U.S. EPA, 2014).

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

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

Regulatory Setting

U.S. Environmental Protection Agency Endangerment Finding

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

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

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

Senate Bill 375

Senate Bill (SB) 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable communities' strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPOs regional transportation plan. CARB, in consultation with MPOs, is required to provide each affected region with GHG reduction targets emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets are to be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects may not be eligible for funding.

Executive Order S-3-05

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

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

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

Title 24, Part 6

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

Title 24, Part 11

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

Senate Bill 3

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

CARB Scoping Plan

On December 11, 2008, CARB adopted its Climate Change Scoping Plan (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted

regulations. The Scoping Plan contains the main strategies California will implement to reduce CO_2eq emissions by 174 million metric tons (MT), or approximately 30 percent, from the State's projected 2020 emissions levels of 596 million $MTCO_2$eq under a business as usual (BAU) scenario. This is a reduction of 42 million $MTCO_2$eq, or almost ten percent, from 2002 to 2004 average emissions, and requires the reductions in the face of population and economic growth through 2020.

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

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

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

- More Clean Cars and Trucks: The 2017 Scoping Plan establishes far-reaching programs to incentivize the sale of zero-emission vehicles, drive the deployment of zero-emission trucks, and shift to a cleaner system of handling freight Statewide.
- Increased Renewable Energy: California's electric utilities are ahead of schedule meeting the requirement that 33 percent of electricity come from renewable sources by 2020. The 2017 Scoping Plan guides utility providers to 50 percent renewables, as required under SB 350.
- Slashing Super-Pollutants: The 2017 Scoping Plan calls for a significant cut in super-pollutants, such as CH_4 and HFC refrigerants, which are responsible for as much as 40 percent of global warming.
- Cleaner Industry and Electricity: California's renewed cap-and-trade program extends the declining cap on emissions from utilities and industries and the carbon allowance auctions. The auctions will continue to fund investments in clean energy and efficiency, particularly in disadvantaged communities.
- Cleaner Fuels: The Low Carbon Fuel Standard will drive further development of cleaner, renewable transportation fuels to replace fossil fuels.
- Smart Community Planning: Local communities will continue developing plans which will further link transportation and housing policies to create sustainable communities.

- Improved Agriculture and Forests: The 2017 Scoping Plan also outlines innovative programs to account for and reduce emissions from agriculture, as well as forests and other natural lands.

SCAG Connect SoCal: 2020-2045 RTP/SCS

SB 375 requires SCAG to incorporate an SCS into its Regional Transportation Plan (RTP) that achieves the GHG emission reduction targets set by CARB. As required by SB 375, CARB adopted year 2020 and 2035 GHG reduction targets for each metropolitan region. The SB 375 targets for the Southern California region under SCAG's jurisdiction in 2020 and 2035 are reductions in per capita GHG emissions of 8 percent and 19 percent, respectively as compared to 2005.[15]

Pursuant to Government Code §65080(b)(2)(K), an SCS does not: (i) regulate the use of land; (ii) supersede the land use authority of cities and counties; or (iii) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it.

SCAG adopted the 2020-2045 RTP/SCS on September 3, 2020.[16] This update to the 2016-2040 RTP/SCS is also expected to meet the State's goal of 19 percent reductions per capital transportation emissions in 2035 as compared to 2005. Additionally, it calls for reducing VMT per capita by five percent and Vehicle Hours Traveled (VHT) per capita by nine percent (for automobiles and light/medium duty trucks).

Gardena Climate Action Plan

The City of Gardena, along with the South Bay Cities Council of Governments (SBCCOG), developed a Climate Action Plan (CAP) to reduce GHG emissions within the City. The City of Gardena CAP (December 2017) serves as a guide for action by setting GHG emission reduction goals and establishing strategies and policy to achieve desired outcomes over the next 20 years. The CAP includes a GHG emissions inventory as well as the following reduction targets for community-wide emissions: 15 percent of 2005 levels by 2020 and 49 percent of 2005 levels by 2035. The CAP outlines GHG reduction measures for various sectors, including transportation, land use, energy efficiency, solid waste, urban greening, and energy generation and storage. Reduction measures include accelerating the market for electric vehicles, encouraging alternative transportation choices, increasing energy efficiency in existing buildings, reducing energy consumption, increasing solid waste diversion, and supporting energy generation in the community.

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

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

[15] California Air Resources Board, 2020 *SB 375 Regional Plan Climate Targets*, https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets, accessed January 10, 2021.

[16] Southern California Association of Governments, *Connect SoCal*, https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx, accessed January 10, 2021.

align with the Statewide goal for 2020 (i.e., achieving 1990 levels), the CAP is consistent with AB 32. Through 2035, the CAP is a qualifying plan under CEQA Guidelines Section 15183.5.

Thresholds of Significance

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions and gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. This section recommends certain factors to be considered in the determination of significance (i.e., the extent to which a project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHGs). The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (CEQA Guidelines Section 15064.7(c)). The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analyses (CEQA Guidelines Section 15064(h)(3)).[17,18] A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project. Since the City of Gardena has a CAP that qualifies under CEQA Guidelines Section 15183.5, a project's incremental contribution to GHG emissions and climate change would be "less than significant", if the project complies with the requirements contained within the CAP.

The Project proposes to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. Thus, the greenhouse gas emissions analysis addresses the potential development of up to four amenity hotels with up to 450 rooms along arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1) and General Industrial (M-2) zones of the City.

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

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

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

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

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

Year	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_2O	CO_2e
2021	0	878.7	878.7	0.1	0	881.2
2022	0	133.2	133.2	<0.1	0	133.5
Total	**0**	**1011.9**	**1011.9**	**0.1**	**0**	**1014.7**
Source: CalEEMod version 2016.3.2						

As shown in Table 4.8-1, Project construction-related activities would generate a maximum of approximately 881 $MTCO_2e$ of GHG emissions in a single year, or approximately 1,015 $MTCO_2e$ over the course of construction. Construction GHG emissions are typically summed and amortized over the Project's lifetime (assumed to be 30 years), then added to the operational emissions.[19] The amortized Project emissions would be approximately 34 $MTCO_2e$ per year. Once construction is complete, the generation of construction-related GHG emissions would cease.

The operational phase of the Project would generate GHGs primarily from the Project's operational vehicle trips and building energy (electricity and natural gas) usage; refer to Table 4.8-2, *Operational GHG Emissions 2022 (Unmitigated Metric Tons/Year)* and Table 4.8-3, *Operational GHG Emissions 2022 (Mitigated Metric Tons/Year)*. Other sources of GHG emissions would be minimal.

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

Table 4.8-2
Operational GHG Emissions 2022 (Unmitigated Metric Tons/Year)

Category	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_2O	CO_2e
Area	0	<0.1	<0.1	<0.1	0	<0.1
Energy	0	2,855.3	2,855.3	0.1	<0.1	2,869.8
Mobile	0	5,072.4	5,072.4	0.3	0	5,079.4
Waste	61.7	0	0	3.6	0	152.9
Water	4.1	48.0	48.0	0.4	<0.1	65.8
Total	**65.8**	**7,975.7**	**7,975.7**	**4.5**	**0.1**	**8,167.8**
Source: CalEEMod version 2016.3.2						

Table 4.8-3
Operational GHG Emissions 2022 (Mitigated Metric Tons/Year)

Category	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_2O	CO_2e
Area	0	<0.1	<0.1	<0.1	0	<0.1
Energy	0	2,855.3	2,855.3	0.1	<0.1	2,869.8
Mobile	0	4,926.1	4,926.1	0.3	0	4,933.0
Waste	61.7	0	0	3.6	0	152.9
Water	4.1	48.0	48.0	0.4	<0.1	65.8
Total	**65.8**	**7,829.4**	**7,895.2**	**4.5**	**0.1**	**8,021.4**
Source: CalEEMod version 2016.3.2						

As shown in Table 4.8-3, Project mitigated operational GHG emissions would total approximately 8,021 $MTCO_2e$ annually, and combined with construction-related GHG emissions, would total approximately 8,055 $MTCO_2e$ annually. In addition, with continued implementation of various statewide measures, the Project's operational energy and mobile source emissions would continue to decline in the future.

Consistency with Applicable GHG Plans, Policies, or Regulations

Gardena Climate Action Plan Consistency

As stated, the CAP's 2020 and 2035 reduction targets (i.e., below baseline emission levels) parallel the State's commitment to reducing GHG emissions under AB 32. Through 2035, the CAP is a qualifying plan under CEQA Guidelines Section 15183.5. In the coming years, as the CAP is reviewed and revised, measures will be implemented to achieve the 2035 target. The CAP includes monitoring and a target for tracking progress with re-inventorying at later dates. As demonstrated in Table 4.6-3, the Project would be consistent with the City's CAP.

2017 Scoping Plan Consistency

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the California Legislature as AB 32. In 2008, CARB approved a Scoping Plan as required by AB 32. The Scoping Plan has a range of GHG reduction actions which include direct regulations, alternative compliance

mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The 2017 Scoping Plan identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the Scoping Plan (2013 Scoping Plan). Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted subsequently as required to achieve Statewide GHG emissions targets.

Table 4.8-4, *Project Consistency with the 2017 Scoping Plan*, summarizes the Project's consistency with applicable policies and measures of the 2017 Scoping Plan. As indicated in Table 4.8-4, the Project would not conflict with any of the provisions of the 2017 Scoping Plan and would support four of the action categories through energy efficiency, water conservation, recycling, and landscaping.

Table 4.8-4
Project Consistency with the 2017 Scoping Plan

Sector/Source	Category/Description	Consistency Analysis
Area		
SCAQMD Rule 445 (Wood Burning Devices)	Restricts the installation of wood-burning devices in new development.	Mandatory Compliance. Approximately 15 percent of California's major anthropogenic sources of black carbon include fireplaces and woodstoves.[1] The Project would not include hearths (woodstove and fireplaces) as mandated by this rule.
Energy		
California Renewables Portfolio Standard, Senate Bill 350 (SB 350) and Senate Bill 100 (SB 100)	Increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020. SB 350 requires 50 percent by 2030. SB 100 requires 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.	No Conflict. The Project would utilize electricity provided by Southern California Edison (SCE), which is required to meet the 2020, 2030, 2045, and 2050 performance standards. In 2018, 31 percent of SCE's electricity came from renewable resources.[2] By 2030 SCE plans to achieve 80 percent carbon-free energy.[3]
California Code of Regulations, Title 24, Building Standards Code	Requires compliance with energy efficiency standards for residential and nonresidential buildings.	Mandatory Compliance. Future development of amenity hotels would be required to meet the applicable requirements of the 2019 (or more current) Title 24 Building Energy Efficiency Standards. Gardena Municipal Code, Chapter 15.04, *General Building Provisions*, adopts by reference California Building Standards Code Title 24 in their entirety, subject to amendments and changes.

Table 4.8-4 (continued)
Project Consistency with the 2017 Scoping Plan

Sector/Source	Category/Description	Consistency Analysis
California Green Building Standards (CALGreen) Code Requirements	All bathroom exhaust fans are required to be ENERGY STAR compliant.	Mandatory Compliance. Amenity hotel construction plans would be required to demonstrate that energy efficiency appliances, including bathroom exhaust fans, and equipment are ENERGY STAR compliant.
	HVAC system designs are required to meet American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) standards.	Mandatory Compliance. Amenity hotel construction plans would be required to demonstrate that the HVAC system meets the ASHRAE standards.
	Air filtration systems are required to meet a minimum efficiency reporting value (MERV) 8 or higher.	Mandatory Compliance. Amenity hotel developments would be required to install air filtration systems (MERV 8 or higher) as part of its compliance with 2019 (or more current) Title 24 Section 401.2, Filters.
	Refrigerants used in newly installed HVAC systems shall not contain any chlorofluorocarbons.	Mandatory Compliance. Future amenity hotel development must meet this requirement as part of its compliance with the CALGreen Code.
	Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces is required for such vehicles.	Mandatory Compliance. Amenity hotel developments would meet this requirement as part of its compliance the CALGreen Code. Further, Gardena Municipal Code Section 15.04.060, *Amendment of Part 11, California Building Standards Code*, requires new hotels and motels to provide electric vehicle (EV) spaces capable of supporting future installation of electric vehicle supply equipment (EVSE) and electric vehicle charging stations (EVCS) and requires a greater number of EV spaces and EVCS.
Mobile Sources		
Mobile Source Strategy (Cleaner Technology and Fuels)	Reduce GHGs and other pollutants from the transportation sector through transition to zero-emission and low-emission vehicles, cleaner transit systems, and reduction of vehicle miles traveled.	Consistent. Future development of amenity hotels would be consistent with this strategy by supporting the use of zero-emission and low-emission vehicles; refer to CALGreen Code discussion above.

Table 4.8-4 (continued)
Project Consistency with the 2017 Scoping Plan

Sector/Source	Category/Description	Consistency Analysis
Senate Bill (SB) 375	SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the state's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035.	Consistent. As demonstrated in Table 4.8-5, the Project would comply with the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), and therefore, the Project would be consistent with SB 375.
Water		
CCR, Title 24, Building Standards Code	Title 24 includes water efficiency requirements for new residential and non- residential uses.	Mandatory Compliance. Refer to the discussion under 2019 Title 24 Building Standards Code and CALGreen Code, above.
Water Conservation Act of 2009 (Senate Bill X7-7)	The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment.	Consistent. Refer to the discussion under 2019 Title 24 Building Standards Code and CALGreen Code, above. Also, refer to Section 4.10, Hydrology and Water Quality.

Table 4.8-4 (continued)
Project Consistency with the 2017 Scoping Plan

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

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

SoCal Connect 2020-2045 RTP/SCS Consistency

The RTP/SCS is a long-range transportation plan that is developed and updated by SCAG every four years. The RTP provides a vision for transportation investments throughout the region. The SCS would integrate land use and transportation strategies that would achieve GHG emissions reduction targets that are forecasted to achieve reduction in GHG emissions to achieve the State's 2035 and 2040 GHG reduction goals.

The 2020-2045 RTP/SCS growth forecasts project an increase of 334,000 jobs by 2035 and 544,000 jobs in 2045 in Los Angeles County, which is approximately the period in which the Project assumes development of up to four amenity hotels would occur.[20] As discussed in Section 4.14, Population and Housing, potential development of four amenity hotels could provide approximately 360 new jobs within the City. This growth would represent less than 0.07 percent of the projected employment growth for Los Angeles County.

[20] This is a conservative assumption based on the historic development of hotels within the City (one hotel has been built in the City since 1990; a Best Western was approved in 2013).

The Gardena General Plan anticipated an increase in jobs within the City associated with the development of employment-generating land uses. More specifically, the Gardena General Plan anticipates an increase of approximately 4,700 jobs in the City between 2005 and 2025, resulting in approximately 39,400 jobs by 2025. SCAG's 2020-2045 RTP/SCS growth forecasts anticipate 32,100 jobs in Gardena by 2045.[21] According to the Profile of the City of Gardena (2019), prepared by SCAG, in 2017 there were 29,405 jobs within the City.[22] The potential addition of 360 jobs would be within the growth projections anticipated by the Gardena General Plan (39,400 jobs by 2025) and SCAG's 2020-2045 RTP/SCS (32,100 jobs by 2045). Thus, the Project is not anticipated to induce substantial unplanned population growth to the area and impacts would be less than significant. Therefore, the Project would be consistent with SCAG's 2020-2045 RTP/SCS and the SCAQMD 2016 AQMP.

As indicated above, the Project would not generate GHG emissions that would have a significant impact on the environment or conflict with any applicable plans, policies, or regulations, including GHG reduction actions/strategies in the City's CAP, the 2017 Scoping Plan and the 2020-2045 RTP/SCS. Since the City's CAP qualifies under CEQA Guidelines Section 15183.5, and the Project complies with the requirements contained with the CAP, the Project's incremental contribution to GHG emissions and climate change would be less than significant. Thus, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

[21] Southern California Association of Governments, *Adopted Final Connect SoCal*, Read the Plan Adopted Final Plan - Southern California Association of Governments, accessed January 10, 2021.

[22] Southern California Association of Governments, *Profile of the City of Gardena, Local Profiles Report 2019*, May 2019, http://www.scag.ca.gov/Documents/Gardena.pdf, accessed August 27, 2020.

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4.9 Hazards and Hazardous Materials

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

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

Less Than Significant Impact. The proposed General Plan and Zoning Code amendments do not involve site-specific development. The intent of the proposed modifications, specific to amenity hotels, is to

encourage future development of amenity hotels within the City. More specifically, the Project anticipates the potential development of up to four amenity hotels with up to 450 rooms along arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City.

Generally, the exposure of persons to hazardous materials could occur in the following manners: 1) improper handling or use of hazardous materials or hazardous wastes during construction or operation of future development, particularly by untrained personnel; 2) an accident during transport; 3) environmentally unsound disposal methods; or 4) fire, explosion or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

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

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

Mitigation Measures: No mitigation measures are required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact With Mitigation Incorporated. One of the means through which human exposure to hazardous substance could occur is through accidental release. Incidents that result in an accidental release of hazardous substance into the environment can cause contamination of soil, surface water, and groundwater, in addition to any toxic fumes that might be generated. Human exposure of contaminated soil, soil vapor, or water can have potential health effects on a variety of factors, including the nature of the contaminant and the degree of exposure.

During construction, there is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluids used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and

minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and Federal law.

Construction activities could also result in accidental conditions involving existing on-site contamination. The proposed Project would allow for the development of amenity hotels along arterials and major collector streets within the C-3, C-4, M-1, and M-2 zones of the City. Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, one site, located at the northeast corner of Rosecrans and Budlong Avenues, has been identified as having the potential to accommodate an amenity hotel. This site is currently a surface parking lot and does not contain any on-site conditions with the potential for contamination. However, development of future amenity hotels could occur on properties with conditions for the potential to have on-site contamination, including structures with the potential for lead-based paint (LBP) and asbestos-containing materials (ACMs). Redevelopment of these sites could expose construction workers and the public to hazardous materials in the future. Future development of amenity hotels would be required to comply with the Gardena General Plan, which includes policies relating to hazardous conditions. Policy LU 3.7 requires mitigation or remediation of potentially hazardous conditions in the City and Policy PS 3.3 requires the City maintain an updated inventory of businesses that handle, store, process, and transport hazardous materials/waste within the City. The General Plan EIR also identifies mitigation (identified as Mitigation Measure HAZ-1, below) that for construction requiring soil excavation and soil filling in areas of known commercial and industrial uses, proper sampling shall be required prior to the disposal of the excavated soil.

Further, Federal and State regulations govern the renovation and demolition of structures where ACMs and LBPs are present. As a Condition of Approval (COA), all demolition that could result in the release of ACM or LBPs must be conducted according to Federal and State standards, including but not limited to, California *Health and Safety Code* Sections 17920.10 and 105256. The National Emission Standards for Hazardous Air Pollutants mandates that building owners conduct an asbestos survey to determine the presence of ACMs prior to the commencement of any remedial work, including demolition. If ACM material is found, abatement of asbestos would be required prior to any demolition activities. If paint is separated from building materials (chemically or physically) during demolition of structures, the paint waste would be required to be evaluated independently from the building material by a qualified Environmental Professional. If LBP is found, abatement would be required to be completed by a qualified Lead Specialist prior to any demolition activities. Development of an amenity hotel that would involve demolition of a structure with the potential for LBP or ACBs would be required to comply with COA HAZ-1 and COA HAZ-2, as well as SCAQMD Rule 1403, regarding the potential for LBP and ACMs.

Compliance with the General Plan goals and policies, COA HAZ-1 and HAZ-2, and SCAQMD Rule 1403, and implementation of General Plan EIR mitigation (Mitigation Measure HAZ-1), would reduce impacts associated with the potential release of hazardous materials into the environment to a less than significant level.

Due to the nature of amenity hotel uses, substantial use of hazardous materials as part of long-term operations are not anticipated. As discussed above, the use of hazardous materials and substances would involve minimal amounts of cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in the regular maintenance of buildings and landscaping. Additionally, an amenity hotel would not result in significant transport, use or disposal of hazardous materials. The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident

conditions involving the release of hazardous materials into the environment and impacts would be less than significant.

COA HAZ-1 Prior to demolition activities, an asbestos survey shall be conducted by an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified building inspector to determine the presence or absence of asbestos containing-materials (ACMs). The sampling method to be used shall be based on the statistical probability that construction materials similar in color and texture contain similar amounts of asbestos. In areas where the material appears to be homogeneous in color and texture over a wide area, bulk samples shall be collected at discrete locations from within these areas. In unique or nonhomogeneous areas, discrete samples of potential ACMs shall be collected. The survey shall identify the likelihood that asbestos is present in concentrations greater than 1 percent in construction materials. The asbestos survey shall be provided to the City of Gardena Building Division. If ACMs are located, abatement of asbestos shall be completed prior to any activities that would disturb ACMs or create an airborne asbestos hazard.

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

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

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

Mitigation Measures: The Mitigation Measures related to hazards and hazardous materials that were specified in the 2006 Certified EIR and adopted in the Mitigation Monitoring and Reporting Program are identified below. These mitigation measures would also be incorporated into the proposed Project.

HAZ-1 Prior to the sale or development of a property where the City is involved with the financing or acquisition of the property, the City shall require a full Phase I Environmental Assessment of the site. In addition, an environmental consultant, familiar with the handling of hazardous wastes, should be either on-site or on call to property remove and dispose of any hazardous wastes encountered during the excavation and/or grading of the site.

Construction requiring soil excavation and soil filling in areas of known commercial and industrial uses, proper sampling shall be required prior to the disposal of excavated soil.

All development and businesses operating within the City shall obtain, prior to receiving a use permit, all relevant licenses and permits from the appropriate agencies charged with regulation of hazardous materials.

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

Less Than Significant Impact. As stated, the Project would allow for development of amenity hotels on arterials and major collector streets within the C-3, C-4, M-1, and M-2 zones of the City. An amenity hotel could be located within 0.25-mile of a school. However, as discussed above, due to the nature and operating characteristics of an amenity hotel, the use or storage of hazardous substances other than limited quantities of hazardous materials such as solvents, fertilizers, pesticides, and other materials used for regular maintenance of buildings and landscaping are not anticipated. Adherence to existing regulations would ensure compliance with safety standards related to the use and storage of hazardous materials, and the safety procedures mandated by applicable Federal, State, and local laws and regulations would reduce potential impacts to schools within the area. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact with Mitigation Incorporated. Government Code Section 65962.5, commonly referred to as the "Cortese List", requires the DTSC and the State Water Resources Control Board (SWRCB) to compile and update a regulatory sites list (pursuant to the criteria of the Section). The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Health and Safety Code Section 116395. Government Code Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste. The proposed Project would allow for the development of amenity hotels along arterials and major collector streets within the C-3, C-4, M-1, and M-2 zones of the City. Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, one site, located at the northeast corner of Rosecrans and Budlong Avenues, has been identified as having the potential to accommodate an amenity hotel. However, there are no sites within the City currently identified on the Cortese List that meet the site criteria for development of an

amenity hotel, including the site located at 1108 W. 141st Street.[23] However, there is the potential that future development of an amenity hotel within the City could occur on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 at that time. Development would be required to comply with the Gardena General Plan, which includes policies specific to hazards and hazardous materials. As stated, Policy LU 3.7 requires mitigation or remediation of potentially hazardous conditions in the City and Policy PS 3.3 requires the City maintain an updated inventory of businesses that handle, store, process, and transport hazardous materials/waste within the City. The General Plan EIR also identifies mitigation that for construction requiring soil excavation and soil filling in areas of known commercial and industrial uses, proper sampling shall be required prior to the disposal of the excavated soil. Compliance with General Plan goals and policies and the implementation of General Plan EIR mitigation (Mitigation Measure HAZ-1) would reduce potential impacts associated with potential development of a site located on a list of hazardous materials sites to a less than significant level.

Mitigation Measures: Refer to Mitigation Measure HAZ-1.

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?

Less Than Significant Impact. Hawthorne Municipal Airport, also known as Jack Northrop Field, is an FAA-designated general aviation reliever airport owned by the City of Hawthorne. The airport is located approximately 0.5-mile north of the northwestern-most boundary of the City of Gardena. The City of Hawthorne General Plan Noise Element provides noise contours (Figures 5A and 5B) for the City of Hawthorne, which includes the airport. The noise contours associated with the airport do not extend beyond the municipal boundaries of the City of Hawthorne. Thus, development of an amenity hotel within the City of Gardena would not result in excessive noise associated with the Hawthorne Municipal Airport.

Due to the proximity of the airport to the City, development within the City is subject to potential hazards associated with airport operations. However, hotels and motels are currently allowed within the C-3, C-4, M-1, and M-2 zones with approval of a CUP; therefore, the proposed Project would not introduce a new use to these zones. Thus, the Project would not introduce a new use that would result in a safety hazard for people working in the area associated with the airport. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The City of Gardena Emergency Operations Plan (EOP) addresses the City's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The City's EOP establishes the emergency organization, assigns tasks, and specifies policies and general procedures. The EOP is designed to include Gardena in the overall California Standardized Emergency Management System (SEMS), which provides a framework

[23] California Department of Toxic Substances Control, *Hazardous Waste and Substances Site List (CORTESE)*, EnviroStor (ca.gov), accessed December 14, 2020.

for coordinating multi-agency responses in the case of emergencies. In the event of an emergency, first responders would coordinate any emergency response or emergency evacuation activities within the City.

The proposed Project would allow for the development of amenity hotels along arterials and major collector streets within the C-3, C-4, M-1, and M-2 zones of the City. Most Arterials and Major Collectors serve as a primary evacuation and emergency access routes within and out of the City. Future development of amenity hotels is not anticipated to result in the modification of roadways surrounding the specific development site or the placement of any permanent physical barriers on adjacent roadways. There is the potential that traffic lanes located immediately adjacent to a development site may be temporarily closed or controlled by construction personnel during construction activities. Any temporary closure would be required to receive permission from the traffic authority in accordance with Gardena Municipal Code Section 13.56.430, *Road closure or interference with highway use*. However, this would be temporary and emergency access to the site and surrounding area would be required to be maintained at all times. Additionally, all construction staging would be required to occur within the boundaries of the development site and would not interfere with circulation along adjacent or any other nearby roadways.

As site-specific development is not currently proposed, it is unknown if development of an amenity hotel would involve the removal of existing driveways or the construction of new driveways or any associated improvements, such as curb, gutter, and sidewalks. The applicant of any proposed development would be required to submit appropriate plans for plan review to ensure compliance with zoning, building, and fire codes prior to the issuance of a building permit. The Los Angeles County Fire Department (LACFD) would review the proposed development for access requirements, minimum driveway widths, fire apparatus access roads, fire lanes, signage, access devices and gates, access walkways, among other requirements to ensure adequate emergency access would be provided to and within the site. The proposed development would be required to comply with all applicable Building and Fire Code requirements and would submit construction plans to the Fire Department's Engineering Building Plan Check Unit for review and approval prior to issuance of any building permit. Approval by the Fire Department would ensure that construction and operation would not impair implementation of or physically interfere with the City's EOP or emergency evacuation plan and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The City of Gardena is urbanized and is not within or located adjacent to any wildlands or areas identified as being at risk of wildland fires. Therefore, the proposed amendments to the General Plan and Zoning Code and potential development of an amenity hotel along arterials and major collector streets within the C-3, C-4, M-1, and M-2 zones would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Mitigation Measures: No mitigation measures are required.

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4.10 Hydrology and Water Quality

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

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

Less Than Significant Impact. The proposed General Plan and Zoning Code amendments do not involve site-specific development. The intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. More specifically, the environmental analysis addressed the potential development of up to four amenity hotels with up to 450 rooms along arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City.

Short-Term Construction

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

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

Construction-related erosion effects would be addressed through compliance with the NPDES program's Construction General Permit. Construction activity subject to this General Permit includes any construction or demolition activity, including, but not limited to, clearing, grading, grubbing, or excavation, or any other activity that results in a land disturbance of equal to or greater than 1.0 acre. Development of a site with an amenity hotel 1.0-acre or greater would be subject to the General Permit. To obtain coverage under the General Permit, dischargers are required to file with the State Water Resources Control Board (SWRCB) the Permit Registration Documents (PRDs), which include a Notice of Intent (NOI) and other compliance-related documents. The General Permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion-control and sediment-control Best Management Practices (BMPs) that would meet or exceed measures required by the General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized.

Site development would also be subject to Gardena Municipal Code Chapter 8.70, *Stormwater and Runoff Pollution Control*. Chapter 8.70 is intended to reduce the quality of pollutants being discharged to the waters of the United States through: the elimination of non-stormwater discharges to the municipal stormwater system; the elimination of discharge of pollutants into the municipal storm drain system; the reduction of pollutants in stormwater discharges to the maximum extent practicable; the protection and enhancement of the quality of the waters of the United States in a manner consistent with the provisions of the Clean Water Act. Section 8.70.110*, Pollutant Source Reduction*, states that no grading permit shall be issued to construction projects disturbing one or more acres of soil without obtaining a General Construction Activity Stormwater Permit (GCASP) from the SWRCB. Projects that disturb less than one acre of soil are required to comply with the minimum BMPs to reduce the discharge of construction-related pollutants to the municipal separate storm sewer system (MS4). The type of BMPs required shall be based on such factors as the amount of soil disturbed, the types of pollutants used or stored at the site, and proximity to water bodies. Erosion control plans may be required at the discretion of the City. If required, the project applicant must submit an erosion control plan to the City for approval as a condition for grading permit issuance.

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

Long-Term Operations

The City of Gardena discharges pollutants from its municipal separate storm sewer (drain) systems (MS4s). Stormwater and non-stormwater are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge requirements contained in Order No. R4-2012-0175 as amended by State Water Board Order WQ 2015-0075 (NPDES Permit No. CAS004001, *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, Except Discharges Originating from the City of Long Beach MS4*.[24]

The MS4 Permit Order requires development and implementation of a Planning and Land Development Program for all "New Development" and "Redevelopment" projects subject to the Order. New development and redevelopment projects/activities subject to Los Angeles County's LID Ordinance include all development projects equal to 1.0 acre or greater of disturbed area. Development of an amenity hotel could occur on a site 1.0-acre or greater and therefore would be required to comply with the Los Angeles's County LID Ordinance.

As stated, Gardena Municipal Code Chapter 8.70, *Stormwater and Runoff Pollution Control*, establishes the requirements to protect water quality. Section 8.70.110, *Pollutant Source Reduction*, requires new development and redevelopment projects subject to the MS4 permit to comply with post-construction runoff pollution reduction BMPs implemented through the Standard Urban Stormwater Mitigation Plan (SUSMP). The SUSMP requires low impact development (LID) BMPs; source control BMPs and structural and nonstructural BMPs for specific types of uses. LID controls effectively reduce the amount of impervious area of a completed project site and promote the use of infiltration and other controls that

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

reduce runoff. Source control BMPs prevent runoff contact with pollutant materials that would otherwise be discharged to the MS4. Specific structural controls are also required to address pollutant discharges from certain uses including but not limited to restaurants, industrial and commercial facilities, and parking lots. The SUSMP would be required to be submitted to the City for review and approval and incorporated into future site plans.

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

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The City of Gardena receives water from Golden State Water Company (GSWC). The City is located within GSWC's Southwest Customer Service Area, which serves approximately 55,000 customers. Water delivered to the Southwest System is a blend of groundwater pumped from the West and Central Coast Groundwater Basins and imported water from the Colorado River Aqueduct and State Water Project (imported and distributed by Metropolitan Water District of Southern California).[25]

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

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

The City of Gardena is proposing to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. The City anticipates that up to four amenity hotels with up to 450 hotel rooms in total could be accommodated on arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4),

[25] Golden State Water Company, *Southwest*, https://www.gswater.com/southwest, accessed December 14, 2020.

Industrial (M-1) and General Industrial (M-2) zones of the City. The Project's water demand would total approximately 43.9 acre-feet per year (AFY). As stated, the Southwest area receives its water from imported water, groundwater and recycled water. Thus, the Project would not rely entirely on groundwater supplies. According to the UWMP, GSWC maintains an allocation of 16,439 AFY from the Central Basin and 7,502 AFY from the West Basin. The adjudicated basins would continue to be subject to the maximum allowed pumping allocation for groundwater extraction. Continued diligence by the pumpers is expected to ensure the reliability of the Central and West Coast Basins groundwater supplies. Therefore, the Project would not substantially deplete groundwater supplies.

It is likely that future development of amenity hotels would occur as infill development or redevelopment of sites that are currently developed and do not provide for significant groundwater recharge. The amount of impervious area is not anticipated to significantly increase when compared to existing conditions. Therefore, the Project would not interfere substantially with groundwater recharge and impacts would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

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

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

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

4) Impede or redirect flood flows?

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

According to the General Plan EIR, the City of Gardena is highly developed and development within the City in accordance with the General Plan would not result in substantial alteration of existing drainage patterns that would result in flooding on- or off-site. Although site-specific development is not currently proposed, it is anticipated that development of amenity hotels would occur as infill development or redevelopment of currently developed sites. Therefore, development would not significantly increase impervious surfaces and runoff would continue to be collected and directed toward the City's existing storm drain system. Any potential development would be required to comply with all Gardena Municipal Code requirements for site drainage and water quality; refer to Response 4.10 (a), as well as General Plan policies. Land Use Policy 3.10 requires that all new development provide adequate improvements, dedications, and fees to the City to fully cover the cost of the City services and facilities. Site-specific development would be required to demonstrate that adequate capacity exists within the City's storm drain system to serve the proposed development or implement on-site improvements. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding, create or contribute runoff that would exceed the capacity of the existing drainage system, or impede or redirect flood flows. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. According to the Federal Emergency Management Agency, Flood Insurance Rate Map, the City of Gardena, with exception of the Gardena Willows Wetland Preserve, is located within an area of minimal flood hazard.[26] The proposed Project would not allow for development within the Gardena Willows Wetland Preserve. Tsunamis are sea waves that are generated in response to large-magnitude earthquakes, which can result in coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. At its closest point, the City of Gardena is approximately 5.0 miles inland of the Pacific Ocean and there are no large bodies of standing water within or near the City. As a result, tsunamis and seiches do not pose hazards due to the City's inland location and lack of nearby bodies of standing water. Potential sites for development of amenity hotels are not located within a flood hazard, tsunami, or seiche zones; therefore, the Project would not potentially result in a release of pollutants due to inundation and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. Refer to Responses 4.10 (a), above regarding water quality. As discussed above, the Southwest System is supplied by two active, GSWC-owned wells in the Central Subbasin, and 10 active, GSWC-owned wells in the West Coast Subbasin. GSWC monitors well capacity, status, and water quality. In 2014, the California Sustainable Groundwater Management Act (SGMA) was passed. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans (GSPs) for crucial groundwater basins in California.[27] 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.[28]

According to the UWMP, the Central Basin adjudication limit (total of the allowed pumping allocations [APA] of each party) for groundwater extraction across the entire basin is 217,367 AFY. GSWC maintains an APA of 16,439 AFY. GSWC's APA is shared between all of their systems that extract groundwater from the Central Basin. GSWC reports total groundwater extractions (on a per-well basis) to the Watermaster. Three agencies, Los Angeles County Department of Public Works (LACDPW), Water Replenishment District of Southern California (WRDSC), and CBMWD, work with the water producers to ensure that the APA is available to the pumpers in the Central Basin. The West Coast Basin adjudication limit for groundwater extraction across the entire basin is 64,468 AFY. GSWC maintains legal rights to 7,502 AFY. GSWC reports monthly groundwater extractions (on a per-well basis) to the Watermaster.

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

[26] Federal Emergency Management Agency, Flood Insurance Rate Map 06037C1795F, effective September 26, 2008, FEMA's National Flood Hazard Layer (NFHL) Viewer (arcgis.com), accessed December 14, 2020.
[27] California Department of Water Resources, *SGMA Groundwater Management*, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed July 10, 2020.
[28] Golden State Water Company, *2015 Urban Water Management Plan – Southwest*, September 2016.

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

In 2015, actual water demand for commercial uses equaled 4,133 AFY. The UWMP utilizes Southern California Association of Governments (SCAG) growth projections to project population, household, and employment for the Southwest System. The UWMP anticipates employment growth of six percent from 2008 to 2035, which equates to an annual employment growth rate of 0.2 percent. UWMP Table 4-2 projects water demand for commercial uses within the Southwest System to be 4,724 AFY in 2020 and 4,882 AFY by 2035 and total water demand of 32,271 AFY in 2020 and 33,545 by 2035.

As stated, the proposed General Plan and Zoning Code amendments do not involve site-specific development. However, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels on arterials and major collector streets within the C-3, C-4, M-1, and M-2 zones of the City. The potential development of up to four amenity hotels with up to 450 hotel rooms would generate a water demand of approximately 43.9 AFY, which would be within the commercial water demand growth projections for the Southwest System. It should be noted that the UWMP uses SCAG growth projections to determine water demand and needed supplies. Because SCAG growth projections are based in part on growth identified in local General Plans, growth associated with buildout of the General Plan land use designations has been anticipated by the growth forecasts and therefore has been anticipated in the UWMP. Hotels and motels are currently allowed uses within the C-3, C-4, M-1, and M-2 zones with approval of a Conditional Use Permit (CUP); a CUP would no longer be needed for an amenity hotel. Thus, amenity hotels would be consistent with uses allowed by the General Plan land use and zoning designations for the potential development sites. The estimated water demand for the amenity hotels is also a conservative estimate as it does not take into account any existing water demand that may be offset by redevelopment of a site that is currently developed and generating water demand. Further, as discussed in Section 4.14, Population and Housing, the Project is not anticipated to generate significant population growth within the City.

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

The Project's water demand, if solely taken from groundwater resources, would represent 0.27 percent of the Southwest Systems total 2015 groundwater supply and 0.74 percent of the total groundwater pumped by the Southwest System in 2015. Furthermore, the City would continue to comply with SBx7-7 requirements, which aim to reduce urban water usage. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.11 Land Use and Planning

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

a) Physically divide an established community?

Less Than Significant Impact. The City of Gardena is proposing to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. The proposed General Plan Amendment would amend the Land Use Plan for the General Commercial designation to allow for an increased FAR under the Zoning Code for specific uses or zones (self-storage facilities are already authorized to have a FAR of 2.75) and up to 2.00 FAR in the Industrial area under the Zoning Code for specific uses or zones; however, amenity hotels would only be allowed to develop under a maximum FAR of 2.0 and only when located on an arterial or major collector street. The clean-up language to the Zoning Code involves permitted uses in the C-3 zone to accurately reflect uses that occur and are permitted within the City and to increase the height limit for the C-3 zone which was inadvertently omitted during earlier code changes that increased the height limit for the C-2 and C-4 zones. These modifications would not alter existing zoning within the City or allow for development that would physically divide an established community.

Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. The City anticipates that up to four amenity hotels with up to 450 hotel rooms in total could be accommodated on arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City. Hotels and motels are currently allowed within these zones with approval of a Conditional Use Permit (CUP); a CUP would no longer be needed for an amenity hotel. Since development of amenity hotels would occur along arterials and major collector streets it is not anticipated that any new roadways or significant infrastructure systems that would physically divide or separate a site from surrounding uses would occur. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The proposed General Plan and Zoning Code language amendments would reflect current conditions that are allowed within the City and would provide consistency between these conditions and the General Plan Land Use and Zoning Code.

The proposed amendments specific to amenity hotels would not conflict with any land use plan, policy, or regulation adopted for purposes of avoiding or mitigating an environmental effect. The proposed amendments would provide specific development standards and conditions for which an amenity hotel can be developed. Hotels and motels are currently allowed within the C-3, C-4, M-1, and M-2 zones with approval of a CUP. Although amenity hotels would not require a CUP, they would be required to comply with the property development standards established by the Gardena Municipal Code specific to the zone in which the site is located. Property development standards include, but are not limited to, lot area and dimensions, building height, setbacks, landscaping, signs, and off-street parking and loading and have been established to ensure the development is consistent and compatible with surrounding uses and also takes into consideration the site's specific location, such as its proximity to residentially-zoned properties. Further, development would be required to comply with Gardena Municipal Code Chapter 18.42, *General Provisions*, which addresses landscape regulations, refuse enclosures, enclosure of mechanical equipment, and security and lighting plans, amongst others. Development of an amenity hotel would be reviewed for consistency with the City's General Plan and Zoning to ensure the proposed development would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mitigation Measures: No mitigation measures are required.

4.12 Mineral Resources

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

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

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

No Impact. The Surface Mining and Reclamation Act of 1975 (SMARA) requires classification of land into mineral resource zones (MRZs) according to the area's known or inferred mineral potential. According to the Gardena General Plan, the State Division of Mines and Geology has not designated any lands within the City as a State classified mineral resources deposit area. In addition, no areas within the City are designated for mineral resources extraction.

Mitigation Measures: No mitigation measures are required.

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4.13 Noise

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

FUNDAMENTALS OF NOISE

Sound, Noise, Acoustics

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

Frequency and Hertz

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

Sound Pressure Levels and Decibels

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

Addition of Decibels

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

Human Response to Changes in Noise Levels

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

Noise Descriptors

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

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

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

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

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

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

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

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

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

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

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

Percent Noise Levels: See L(n).

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

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

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

Traffic Noise Prediction

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

Sound Propagation

As sound propagates from a source it spreads geometrically. Sound from a small, localized source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates at a rate of 6 dB per doubling of distance. The movement of vehicles down a roadway makes the source of the sound appear to propagate from a line (i.e., line source) rather than a point source. This line source results in the noise propagating from a roadway in a cylindrical spreading versus a spherical spreading that results from a point source. The sound level attenuates for a line source at a rate of 3 dB per doubling of distance.

As noise propagates from the source, it is affected by the ground and atmosphere. Noise models use hard site (reflective surfaces) and soft site (absorptive surfaces) to help calculate predicted noise levels. Hard

site conditions assume no excessive ground absorption between the noise source and the receiver. Soft site conditions such as grass, soft dirt or landscaping attenuate noise at a rate of 1.5 dB per doubling of distance. When added to the geometric spreading, the excess ground attenuation results in an overall noise attenuation of 4.5 dB per doubling of distance for a line source and 7.5 dB per doubling of distance for a point source.

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

GROUND-BOURNE VIBRATION FUNDAMENTALS

Vibration Descriptors

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

Several different methods are used to quantify vibration amplitude.

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

Vibration Perception

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

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

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

EXISTING NOISE ENVIRONMENT

Noise Sources

The City of Gardena experiences noise typical of urbanized environments, including noise from motor vehicles traveling on roadways, railroad operations, aircraft overflights, industrial and commercial uses, and other stationary noise sources typical of a built environment. According to the General Plan, the most significant noise-producing activity within the City involves transportation elements.

Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Residences, hospitals, schools, guest lodging, libraries, and churches are treated as the most sensitive to noise intrusion and therefore have more stringent noise exposure targets than do other uses, such as manufacturing or agricultural uses that are not subject to impacts such as sleep disturbance. Sensitive receptors are located throughout the City.

REGULATORY FRAMEWORK

City of Gardena General Plan

Applicable policies and standards governing environmental noise in the City are set forth in the General Plan Noise Element. Figure N-1 of the Gardena Noise Element outlines the interior and exterior noise standards for community noise environments. In addition to the noise standards, the City has outlined goals, policies and implementation measures to reduce potential noise impacts.

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

City of Gardena Municipal Code

Gardena Municipal Code Section 8.36.040, *Exterior noise standards*, and 8.36.050, *Interior noise standards*, state the exterior and interior noise standards for the City in terms of Leq(15) and Lmax. The allowable noise levels at land uses receiving noise are summarized in Table 4.13-1, *Allowable Exterior and Interior Noise Levels*. The Gardena Municipal Code states that if the ambient noise level exceeds the noise standard, then the ambient noise level shall become the noise standards. Gardena Municipal Code Section 8.36.070, *Prohibited acts*, prohibits the operation of a device that generates vibration which is above the perception threshold of an individual at or beyond the property line if the source is on private property.

Table 4.13-1
Allowable Exterior and Interior Noise Levels

Type of Land Use	15-Minute Average Noise Level (Leq(15))		Maximum Noise Level (Lmax)	
	7 am – 10 pm	10 pm to 7 am	7 am – 10 pm	10 pm to 7 am
Exterior Noise Levels				
Residential	55 dB(A)	50 dB(A)	75 dB(A)	70 dB(A)
Residential portions of mixed-use	60 dB(A)	50 dB(A)	80 dB(A)	70 dB(A)
Commercial	65 dB(A)	60 dB(A)	85 dB(A)	80 dB(A)
Industrial and manufacturing	70 dB(A)	70 dB(A)	90 dB(A)	90 dB(A)
Interior Noise Levels				
Residential	45 dB(A)	40 dB(A)	65 dB(A)	60 dB(A)
Residential portions of mixed-use	45 dB(A)	40 dB(A)	70 dB(A)	60 dB(A)
Source: City of Gardena, Municipal Code, Sections 8.36.040 and 8.36.050				

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

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

Less Than Significant Impact. The City of Gardena is proposing to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. The proposed General Plan Amendment would amend the Land Use Plan for the General Commercial designation to allow for an increased FAR under the Zoning Code for specific uses or zones (self-storage facilities are already authorized to have a FAR of 2.75) and up to 2.00 FAR in the Industrial area under the Zoning Code for specific uses or zones; however, amenity hotels would only be allowed to develop under a maximum FAR of 2.0 and only when located on an arterial or major collector street. The clean-up language to the Zoning Code involves permitted uses in the C-3 zone to accurately reflect uses that occur and are permitted within the City and to increase the height limit for the C-3 zone which was inadvertently omitted during earlier code changes that increased the height limit for the C-2 and C-4 zones. These modifications would not alter any development standards or requirements specific to noise.

Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. The City anticipates that up to four amenity hotels with up to 450 hotel rooms in total could be accommodated on arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City. Hotels and motels are currently allowed within these zones with approval of a Conditional Use Permit (CUP); a CUP would no longer be needed for an amenity hotel. Therefore, development of an amenity hotel within the specific zones would be consistent with the General Plan land use and zoning.

CONSTRUCTION NOISE

The degree of construction noise may vary for different areas of a construction site and also vary depending on the specific construction activities. Noise levels associated with the construction of an amenity hotel would vary with the different phases of construction. Typical noise levels associated with construction equipment anticipated to be used for construction activities are shown in Table 4.13-2, *Typical Construction Equipment Noise Levels*.

Table 4.13-2
Typical Construction Equipment Noise Levels

Type of Equipment	Range of Maximum Sound Levels Measures (dBA at 50 feet)	Suggested Maximum Sound Levels for Analysis (dBA at 50 feet)
Rock Drills	83-99	96
Jack Hammers	75-85	82
Pneumatic Tools	78-88	85
Pumps	74-84	80
Dozers	77-90	85
Scrappers	83-91	87
Haul Trucks	83-94	88
Cranes	79-86	82
Portable Generators	71-87	80
Rollers	75-82	80
Tractors	77-82	80
Front-End Loaders	77-90	86
Hydraulic Excavators	81-90	86
Graders	79-89	86
Air Compressors	76-89	86
Trucks	81-87	86

Construction activities associated with amenity hotels would likely include site preparation, grading, building construction, and architectural coating. Such activities would require graders, scrapers, and tractors during site preparation; graders, dozers, and tractors during grading; cranes, forklifts, generators, tractors, and welders during building construction; and air compressors during architectural coating. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Noise levels would be loudest during the grading phase.

With the exception of the site located at 1108 W. 141st Street, specific sites have not been identified for future amenity hotel development. The 1108 W. 141st Street Project site is located adjacent to residential uses. The IS/MND noise analysis determined that construction noise impacts would be less than significant, as construction activities would be required to comply with the Gardena General Plan and Municipal Code requirements regarding permissible hours for construction activities. As stated, amenity hotels could be located along Major Arterials and Collectors within the C-3, C-4, M-1, and M-2 zones of the City. The types of uses within the surrounding area and distance to those uses are not currently known. It is anticipated that construction activities would result in a temporary or periodic increase in the ambient noise level above existing noise levels within the vicinity of the development site. Construction noise is

considered a short-term impact and would be considered significant if construction activities occur outside the allowable times as described in the City's General Plan and Municipal Code. However, construction activities would be required to occur during the permissible hours in accordance with the City's General Plan and Municipal Code. Thus, construction impacts would not be considered significant. With implementation of recommended conditions of approval, construction-related noise would be further reduced. The specification of equipment noise limits forces the use of modern equipment having improved engine insulation and mufflers. Implementation of recommended conditions of approval would also require orientation of stationary construction equipment away from nearby sensitive receptors, among other requirements.

OPERATIONAL NOISE

Stationary Noise Sources

As stated, the Project anticipates the potential development of up to four amenity hotels along Major Arterials and Collectors. Noise typical of commercial uses, such as hotels include parking lot activities (e.g., vehicle start-up, slamming car doors, occasional alarms, etc.), mechanical equipment (e.g., heating ventilation and air conditioning [HVAC] equipment), general maintenance activities, and conversations.

The 1108 W. 141st Street GPA & ZC Project IS/MND calculated the noise levels at the nearest sensitive receptors to the north, south, and west of the site and concluded noise levels are not expected to exceed the City's 55 dBA residential limit or the 65 dBA commercial limit established by the City's noise ordinance at that site. Further, the potential development's contribution to existing noise levels were determined to be within the "not perceptible" acoustic characteristic and impacts would be less than significant. As the other three potential sites for development of amenity hotels are unknown, stationary noise levels at the nearest sensitive receptors (if any) cannot be calculated at this time. Future development of amenity hotels would be required to comply with Gardena General Plan policies, including Policy N-2.4 which requires mitigation of all significant noise impacts as a condition of project approval, Policy N-2.5 which requires new commercial/industrial operations located in proximity to existing or proposed residential areas to incorporate noise mitigation into the project design, and Policy N-3.2, which requires compliance with noise regulations, and compliance with Gardena Municipal Code Section 8.36.040 exterior and interior noise standards. Applicants of future amenity hotel projects would be required to demonstrate compliance with the City's noise ordinance. Following conformance with the existing regulatory framework, impacts would be less than significant in this regard.

Off-Site Traffic Noise

The proposed Project would generate traffic volumes along roadways within the vicinity of the specific development sites. The development of up to four amenity hotels could result in 3,762 average daily trips (ADT). In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Traffic volumes on area roadways would have to approximately double for the resulting traffic noise levels to generate a 3-dBA increase. As stated, amenity hotels would be allowed along arterials and major collector streets. Arterials typically carry between 40,000 and 60,000 vehicles per day and Collectors typically carry between 15,000 and 25,000 vehicles per day.[29] The Gardena General Plan EIR identified 2006 traffic volumes on Arterials and Collectors (which include both Collectors and Major Collectors) within the City. Volumes for Arterials and Major Collectors ranged from 10,800 (Manhattan Beach Boulevard, Crenshaw to Van Ness) to 47,900 (Artesia Boulevard, Normandie Avenue

[29] City of Gardena, *Gardena General Plan 2006*, Circulation Element.

to Vermont Avenue) vehicles per day and forecast traffic volumes along the same roadway segments to be 11,660 and 51,730 vehicles per day by 2025, respectively.[30] Assuming as a worst-case scenario that all potential trips that could be generated by the development of up to four amenity hotels occurred in the same location along or in vicinity to these roadway segments, an additional 3,762 vehicles per day would be added to these roadway segments. However, the Project's ADTs would not result in a doubling of trips along either of these roadway segments. Further, the 1108 W. 141st Street GPA & ZC Project IS/MND determined that development of that site with a 126-room hotel and restaurant use would not result in off-site traffic noise impacts. Future development of amenity hotels would be required to comply with Gardena General Plan policies, including Policy N-2.4 which requires mitigation of all significant noise impacts as a condition of project approval and Policy N-3.2, which requires compliance with noise regulations, and compliance with Gardena Municipal Code exterior and interior noise standards.

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

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

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

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. Construction activities can produce vibration that may be felt by adjacent land uses. The Caltrans Transportation and Construction Induced Vibration Guidance Manual provides general thresholds and guidelines as to the vibration damage potential from vibration impacts. Table 4.13-3, *Guideline Vibration Damage Potential Threshold Criteria*, identifies the thresholds and Table 4.13-4, *Vibration Source Levels for Construction Equipment*, identifies the approximate vibration levels for particular construction activities at a distance of 25 feet.

[30] City of Gardena, *Gardena General Plan 2006 Final Environmental Impact Report*, SCH# 2005021125, April 2006.

Table 4.13-3
Guideline Vibration Damage Potential Threshold Criteria

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

Table 4.13-4
Vibration Source Levels for Construction Equipment

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

The construction of amenity hotel uses are not anticipated to require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. The primary vibration source during construction may be from a bull dozer. A large bulldozer would yield a worst-case 0.5 PPV (in/sec) which is perceptible but sustainably below any risk of damage (0.5 in/sec PPV is the threshold of residential structures). It is also acknowledged that construction activities would occur throughout a construction site and would not typically be concentrated at the point closest to the nearest structures. Potential vibration impacts would be less than significant, and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. Hawthorne Municipal Airport, also known as Jack Northrop Field, is an FAA-designated general aviation reliever airport owned by the City of Hawthorne. The airport is located approximately 0.5-mile north of the northwestern-most portion of the City of Gardena. The City of Hawthorne General Plan Noise Element provides noise contours (Figures 5A and 5B) for the City, which include the airport. The noise contours associated with the airport do not extend beyond the municipal boundaries of the City of Hawthorne. Thus, development of an amenity hotel within the City of Gardena would not expose people to excessive noise associated with the Hawthorne Municipal Airport.

Mitigation Measures: No mitigation measures are required.

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4.14 Population and Housing

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

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

Less Than Significant Impact. The City of Gardena is proposing to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. The proposed General Plan Amendment would amend the Land Use Plan for the General Commercial designation to allow for an increased FAR under the Zoning Code for specific uses or zones (self-storage facilities are already authorized to have a FAR of 2.75) and up to 2.00 FAR in the Industrial area under the Zoning Code for specific uses or zones; however, amenity hotels would only be allowed to develop under a maximum FAR of 2.0 and only when located on an arterial or major collector street. The clean-up language to the Zoning Code involves permitted uses in the C-3 zone to accurately reflect uses that occur and are permitted within the City and to increase the height limit for the C-3 zone which was inadvertently omitted during earlier code changes that increased the height limit for the C-2 and C-4 zones. These modifications would not induce substantial unplanned population growth directly through new homes or indirectly through the extension of roads or other infrastructure.

Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. The City anticipates that up to four amenity hotels with up to 450 hotel rooms in total could be accommodated on arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City. The development of amenity hotels would not induce substantial unplanned population growth directly through new homes or indirectly through the extension of roads or other infrastructure.

Development of an amenity hotel would provide for employment opportunities during construction and operation. Although unlikely, potential employment opportunities could directly increase the City's population, as employees (and their families) may choose to relocate to the City. Four amenity hotels with

up to 450 rooms are anticipated to generate approximately 360 employees.[31] It should be noted that estimating the number of future employees who would choose to relocate to the City would be highly speculative since many factors influence personal housing location decisions (i.e., family income levels and the cost and availability of suitable housing in the local area). Further, amenity hotels do not typically provide employment opportunities that involve substantial numbers of people needing to permanently relocate to fill the positions, but rather would provide employment opportunities to people within the local community and surrounding areas. Assuming 360 new employees (and their families) relocate to Gardena, Project implementation would result in a potential population increase of approximately 1,019 persons.[32] This is a conservative assumption, as it assumes all employees would relocate to the City along with their families instead of the more likely scenario of existing Gardena or other nearby residents to fill some of the new employment opportunities.

The forecast population growth would increase the City's existing (2020) population of 60,937 persons by approximately 1.7 percent to 61,956 persons.[33] The Gardena General Plan anticipates a population of 63,799 persons at buildout. Thus, the Project would be within the population projections anticipated and planned for by the City's General Plan and would not induce substantial unplanned population growth in the area.

The Gardena General Plan anticipated an increase of approximately 4,700 jobs in the City between 2005 and 2025, resulting in approximately 39,400 jobs by 2025. SCAG's 2020-2045 RTP/SCS growth forecasts anticipate 32,100 jobs by 2045.[34] According to the Profile of the City of Gardena (2019), prepared by SCAG, in 2017 there were 29,405 jobs within the City.[35] As stated, potential development of four amenity hotels could provide approximately 360 new jobs within the City. The potential addition of 360 jobs would be within the growth projections anticipated by the Gardena General Plan (39,400 jobs by 2025) and SCAG's 2020-2045 RTP/SCS (32,100 jobs by 2045). Thus, the Project is not anticipated to induce substantial unplanned population growth to the area and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The Project would not change the zoning of any parcels within the City currently zoned for residential uses. Further, the Project would not alter any zones where residential development is currently allowed by the Gardena Municipal Code. The Project would allow for the development of amenity hotels within the C-3, C-4, M-1, and M-2 zones on arterials and major collector streets. It is not anticipated that future development of parcels within these zones with an amenity hotel

[31] Based on the World Tourist Organization recommended staffing rate of 8 persons per 10 rooms for similar type hotels.

[32] Based upon an average household size of 2.83 persons per household per the State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State – January 1, 2011-2020*, Sacramento, California, May 2020.

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

[34] Southern California Association of Governments, *Adopted Final Connect SoCal*, Read the Plan Adopted Final Plan - Southern California Association of Governments, accessed January 10, 2021.

[35] Southern California Association of Governments, *Profile of the City of Gardena, Local Profiles Report 2019*, May 2019, http://www.scag.ca.gov/Documents/Gardena.pdf, accessed August 27, 2020.

would displace substantial numbers of existing people or housing, as residential uses are prohibited within these zones. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.15 Public Services

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

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

1) Fire protection?

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

The City of Gardena is proposing to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. The clean-up language to the General Plan and Zoning Code would not involve or allow for new development that is not currently allowed by the City's General Plan and Zoning.

Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. The City anticipates that up to four amenity hotels with

up to 450 hotel rooms in total could be accommodated on arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City. The development of amenity hotels could increase the demand for fire protection and emergency medical services when compared to existing conditions; however, this would be dependent upon the specific parcel and whether it is currently developed and receiving services. Hotels and motels are allowed uses within the C-3, C-4, M-1, and M-2 zones with approval of a Conditional Use Permit (CUP). Although the Project would not require a CUP for the development of amenity hotels, the Gardena General Plan anticipates development within the City under buildout conditions, which includes development of all sites within the City. Development of up to four amenity hotels would not significantly impact fire protection services resulting in the need for new or physically altered facilities.

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

Mitigation Measures: No mitigation measures are required.

2) Police protection?

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

As stated, the clean-up language to the General Plan and Zoning Code would not involve or allow for new development that is not currently allowed by the City's General Plan and Zoning. Similar to fire protection services, the potential development of up to four amenity hotels could increase the demand for police protection services when compared to existing conditions; however, this would be dependent upon the specific parcel and whether it is currently developed and receiving services. Hotels and motels are currently allowed uses within the C-3, C-4, M-1, and M-2 zones with approval of a Conditional Use Permit (CUP). Although the Project would not require a CUP for the development of amenity hotels, the Gardena General Plan anticipates development within the City under buildout conditions, which includes development of all sites within the City. Development of up to four amenity hotels would not significantly impact police protection services resulting in the need for new or physically altered facilities.

As part of the development review process, the Gardena Police Department would review site-specific development plans and the applicant would be required to comply with any specific conditions related to safety and security specified by the Gardena Police Department. The Project would not require the need for new or physically altered police facilities in order to maintain acceptable service ratios, response times or other performance objectives and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

3) Schools?

Less Than Significant Impact. The Project does not propose the development of residential uses; therefore, the Project would not result in new students to the Los Angeles Unified School District. Development within the City would be subject to payment of school impact fees in accordance with Senate Bill 50 (SB 50). Pursuant to Government Code §65995(3)(h), payment of statutory fees is deemed to be full and complete mitigation of impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property…" Developer fees collected by LAUSD pursuant to SB 50 are used for the provision of additional and reconstructed or modernized school facilities. The Project applicants would be required to pay all statutory fees in place at the time and demonstrate proof of payment to the City. With payment of the fees, impacts to schools would be less than significant.

Mitigation Measures: No mitigation measures are required.

4) Parks?

Less Than Significant Impact. The proposed General Plan and Zoning Code amendments do not involve site-specific development; however, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. Although the use of City parks and recreational facilities by hotel patrons may occur, it likely would be limited. The use of these City facilities would not result in the need for new or physically altered park or recreation facilities and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

5) Other public facilities?

Less Than Significant Impact. Los Angeles County provides library, cultural resource centers and bookmobile services to over 3.4 million residents living in unincorporated areas and to residents in 49 of the 88 incorporated cities of Los Angeles County. LA County Library has a 7.5 million volume book collection and also provides magazines, newspapers, government publications and specialized materials including online databases. There is one library located within the City of Gardena: Gardena Mayme Dear Library. The Masao W. Satow Library (currently closed for refurbishment) is located just outside of the City's jurisdictional boundaries to the west, within unincorporated Los Angeles County. As stated, the Project does not propose the development of residential uses and the number of employees that may choose to relocate to the site would not result in a significant increase in the population that has not already been considered in the General Plan. Therefore, the Project would not provide for increased population growth resulting in an increased demand for public facilities or the need for new or physically altered library facilities to adequately serve the community. Impacts to library services would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.16 Recreation

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

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

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

Mitigation Measures: Less Than Significant Impact.

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

Less Than Significant Impact. Refer to Response to 4.15 (a)(4). The Project does not propose any recreational facilities. The development of recreational facilities, separate from hotel amenities, are not anticipated to occur as part of the Project. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.17 Transportation

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

This section is based in part on the *Hotel Development Standards General Plan & Zoning Code Amendment Project Transportation Memorandum* (Transportation Memorandum), prepared by Kittelson & Associates, dated December 9, 2020 and included in its entirety as Appendix C, Transportation Memorandum.

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

Less Than Significant Impact.

Transit Facilities

The City is served by GTrans and LA Metro. GTrans provides public transportation services in the South Bay, including the cities of Gardena, Hawthorne, Compton, Carson, Harbor City, Lawndale, and Los Angeles. GTrans currently operates four service lines:

Line 1X. GTrans Line 1X connects riders from Hawthorne, Lawndale, and Gardena to downtown Los Angeles. Popular destinations on this bus route include Peary Middle School, Serra High School, Lawndale High School, Gardena City Hall, Hustler Casino, Lucky Lady Casino and Harbor Gateway Transit Center. Popular Downtown destinations include Little Tokyo, LA City Hall, the Fashion District, and connections to the Metro Red and Purple Lines.

Line 2. GTrans Line 2 circles Western, Imperial Highway, Vermont, Normandie and PCH. Popular destinations on this bus route include Gardena High School, Narbonne High School, Henry Clay Middle School, Fleming Middle School, LASC, Gardena Memorial Hospital, Kaiser Permanente, Harbor UCLA Medical Center, Gardena City Hall, and Harbor Gateway Transit Center.

Line 3. GTrans Line 3 connects riders to shopping in Redondo Beach and Compton, while traveling through the center of Gardena. Popular destinations on this bus route include Alondra Park, El Camino College, Compton High School, Bishop Montgomery High School, Hustler Casino, South Bay Galleria, Gardena Memorial Hospital, Compton Towne Center and Compton MLK Transit Center.

Line 5. GTrans Line 5 runs parallel to the 105 Freeway in Hawthorne, Gardena and Compton, providing riders connections to Metro buses on El Segundo Boulevard and to Metro Rail at the Imperial and Aviation Stations. Popular destinations on this bus route include Centennial High School, Hawthorne High School, Hawthorne Memorial Center, Hawthorne Sports Center, MLK Community Hospital and Magic Johnson Park.

LA Metro operates several lines within and through the City, connecting Gardena to other transit systems, such as Metrolink.

As amenity hotels would occur on arterials and major collector streets, it is anticipated that they would be served by the existing transit system. Potential patrons and employees associated with an amenity hotel could incrementally increase the demand for public transit services. However, the Project would not conflict with a program plan, ordinance, or policy addressing transit and impacts would be less than significant.

Roadway Facilities

As stated, amenity hotels would be allowed on arterials and major collector streets. According to the Gardena General Plan, an arterial roadway connects traffic from smaller roadways to freeway interchanges and regional roadway corridors. They serve as the principal urban thoroughfares, provide a linkage between activity centers in the City to adjacent communities and other parts of the region, and provide intra-city mobility. A major collector serves as an immediate route to carry traffic between collector roadways and arterial roadways. Access to adjacent land uses is generally unrestricted. Traffic controls typically consist of signalization at intersections with arterials; however, left-turn lanes and/or left-turn signalization are generally not provided. On street parking is generally acceptable, although it might be prohibited during certain hours, or it may be based on a maximum time limit. Although the Project anticipates the potential development of up to four amenity hotels, the Project does not propose site-specific development. Thus, no modifications to roadways within the City are proposed. Potential development of parcels along arterials and major collector streets with an amenity hotel is not anticipated to involve modifications to the adjacent roadways.

There is the potential that traffic lanes located immediately adjacent to a development site may be temporarily closed or controlled by construction personnel during construction activities. Any temporary closure would be required to receive permission from the traffic authority in accordance with Gardena Municipal Code Section 13.56.430, *Road closure or interference with highway use*. However, this would be temporary and emergency access to the site and surrounding area would be required to be maintained at all times. Additionally, all construction staging would be required to occur within the boundaries of the development site and would not interfere with circulation along adjacent or any other nearby roadways.

Bicycle Facilities

The City adopted the South Bay Bicycle Master Plan (Bicycle Master Plan), which is a multi-jurisdictional bicycle master plan intended to guide the development and maintenance of a comprehensive bicycle network and set of programs throughout the cities in the South Bay, including Gardena. The Bicycle

Master Plan (Figure 4-3) identifies proposed bicycle facilities within Gardena, including facilities along arterials and major collector streets. It is not anticipated that development of amenity hotels would conflict with implementation of the Bicycle Master Plan. As site-specific development is proposed, opportunities to implement the Bicycle Master Plan would be considered. Potential patrons and employees of an amenity hotel could incrementally increase the use of bicycle facilities within the City; however, the Project would not conflict with a program plan, ordinance, or policy addressing bicycle facilities and impacts would be less than significant.

Pedestrian Facilities

Sidewalks are currently provided along arterials and major collector streets within the City. As stated, the Project does not propose site specific development. Thus, no modifications to existing pedestrian facilities within are proposed. Development of specific parcels with an amenity hotel would be required to maintain or provide improved sidewalks and pedestrian access to the proposed development in accordance with City requirements. The Project would not conflict with a program, plan, ordinance or policy addressing pedestrian facilities and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact With Mitigation Incorporated. The Project proposes to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. The City anticipates that up to four amenity hotels with up to 450 hotel rooms in total could be accommodated on arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City.

As previously noted, one site, located at the northeast corner of Rosecrans and Budlong Avenues, has been identified as having the potential to accommodate a 126-room amenity hotel. A VMT analysis was conducted for the 1108 W. 141st Street GPA & ZC Project IS/MND, for the potential development of a 126-room hotel and determined a project VMT impact and a cumulative VMT impact would occur for a hotel at this site. The IS/MND documented that a mitigation measure of a $3.67 per day per employee transit subsidy (with a minimum of 27% hotel employee eligibility) would reduce a significant project impact and significant cumulative impact at this site to a less than significant level.

For purposes of this analysis, it is assumed that up to 450 rooms would be developed, consisting of one amenity hotel with up to 126 rooms at the northeast corner of Rosecrans and Budlong Avenues (1108 W. 141st Street) and the remaining three amenity hotels with up to 324 rooms on arterials and major collector streets within the four previously identified zones in accordance with the proposed amenity hotel development standards.

The City's *SB 743 Implementation Transportation Analysis Updates* (Transportation Analysis Guidelines), includes criteria for individual project screening, which can be used to screen projects that are expected

to generate low vehicles miles traveled (VMT) out of a detailed VMT analysis. The City's three VMT screening criteria and determinations include:

- Project Type Screening: Projects that generate less than 110 daily trips, local-serving retail projects less than 50,000 square feet, and affordable housing projects may be screened from conducting a VMT analysis. None of these conditions would apply to this Project. It should be noted that a 100-room hotel would generate 836 daily trips, based on Institute of Transportation Engineers (ITE) trip generation rates.

- Transit Proximity Screening: Projects located within a High Quality Transit Area (HQTA) would be screened from a detailed VMT analysis if the project does not have certain characteristics. This screening criteria cannot be applied if the project:
    - Has a Floor Area Ratio (FAR) of less than 0.75 (for office, retail, hotel, and industrial projects) or less than 20 units per acre (for residential projects).
    - Includes more parking for use by residents, customers, or employees than required by the City (unless additional parking is being provided for design feasibility, such as completing the floor of a subterranean or structured parking facility, or if additional parking is located within the project site to serve adjacent uses).
    - Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the City).
    - Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

  According to Figure 3 in the City's guidelines, the majority of potential amenity hotel sites are located in a frequent transit area (within a half-mile radius of an existing or planned major transit stop, or an existing stop along a high-quality transit corridor, which has fixed route bus service with service intervals no longer than 15 minutes during peak commute hours). In addition, this Project would meet the other criteria necessary to screen out due to transit proximity:

    - Amenity hotels would have FARs of at least 0.75.
    - The City has indicated that supplying parking in excess of minimum requirements would be prohibited.
    - The Project is consistent with the Southern California Association of Governments (SCAG) Sustainable Communities Strategy (SCS) since no land use changes are proposed and the number of residential units in the City would not be affected.
    - Amenity hotels would not replace residential units.

  Under the transit proximity screening criteria, 260 of the 268 potential hotel site parcels would screen out of a VMT analysis. The following areas and parcels would not screen out; refer to Exhibit 4.17-1, *VMT Screening Results*:

    - North side of Marine Avenue between Van Ness Avenue and Wadkins Avenue
        - APN 4064-015-020
        - APN 4064-023-018
        - APN 4064-023-034
        - APN 4064-030-019
    - West side of Normandie Avenue between 166th Street and W. 170th Street
        - APN 6106-027-039

        - APN 6106-027-028
        - APN 6106-030-011
    - The 1108 W. 141st Street site (as documented in the 1108 W. 141st Street GPA & ZC Project MND)[36]

- Low VMT Area Screening: Projects that are assessed using home-based work VMT per employee (such as hotels) in a low-VMT generating area may be screened from a VMT analysis. According to Figure 1 in the City's guidelines, several potential sites are located in areas with a daily home-based work VMT per employee that is below 85% of the regional average. However, most of these sites are already covered under the areas screened out under the transit proximity screening criteria, as shown in Exhibit 4.17-1. However, parcel 4064-015-020 (north side of Marine Avenue between Wadkins Avenue and Miller Avenue) was not screened out under the transit proximity criteria but is screened out under the low VMT area screening criteria, as shown in Exhibit 4.17-1.

Based on the VMT screening, 261 of the 268 potential hotel site parcels would screen out of a VMT analysis; hotels located at these sites would result in a less-than-significant VMT impact and would not require mitigation measures.

The following areas and parcels are not screened out and would require a VMT analysis, refer to Exhibit 4.17-1:

- North side of Marine Avenue between Van Ness Avenue and Wadkins Avenue
    - APN 4064-023-018
    - APN 4064-023-034
    - APN 4064-030-019
- West side of Normandie Avenue between 166th Street and W. 170th Street
    - APN 6106-027-039
    - APN 6106-027-028
    - APN 6106-030-011
- The 1108 W. 141st Street site (A VMT analysis was conducted for this site in the 1108 W. 141st Street GPA & ZC Project MND and is therefore not reanalyzed within this document)

A VMT impact analysis was conducted for projects that may be located on the six parcels that were not screened out (as described above).

According to the City's guidelines, the following VMT impact thresholds are applicable to hotel projects:

- **Project Threshold**: A significant impact will occur if the project generates daily home-based work VMT per employee in excess of the impact threshold of 14.65 VMT per employee.

- **Cumulative Threshold**: A significant impact will occur if the project threshold is exceeded or if the project is determined to be inconsistent with the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

[36] Although the proposed amendments to the City's development standards would include an increase in FAR to 2.0, discussion with hotel developers and an examination of other hotels in the area determined that a hotel at a FAR of 2.0 on the site would not be a viable option.

Legend

- Gardena City Limits
- 1108 W. 141st Street Project
- Arterial Roads
- Major Collector Roads

Possible Amenity Hotel Sites

- Not Screened Out (VMT Impact)
- Screened Out (Transit Proximity)
- Screened Out (Low VMT Area)
- Screened Out (Transit + Low VMT)

0 600 1,200
Feet

Sources: Los Angeles County GIS; Gardena Zoning Map, January 2018. Date: October 20, 2020. Revised: January 11, 2021.

CITY OF GARDENA
HOTEL DEVELOPMENT STANDARDS GENERAL PLAN AND ZONING CODE AMENDMENT PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Exhibit 4.17-1. VMT Screening Results

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

To determine project-related VMT impacts resulting from projects located in the non-screened areas in the City, existing home-based work VMT per employee for the sites were extracted from the City's spreadsheet-based VMT estimating tool. This tool provides existing (2020) residential and employment VMT estimates for the region, the City, and the City's transportation analysis zones (TAZs) interpolated from the base year and cumulative year SCAG regional travel demand models.

APN 4064-023-018/4064-023-034/4064-030-019 (North side of Marine Avenue)

These parcels are located in Transportation Analysis Zone (TAZ) 21221100. According to the City's tool, an amenity hotel project at any of these sites is expected to generate 15.12 VMT per employee. The sites' expected home-based work VMT per employee would exceed the threshold of 14.65 VMT per employee. Since an amenity hotel at these sites is estimated to generate daily home-based work VMT per employee higher than the threshold, it would result in a significant VMT impact.

Since the project threshold is exceeded, an amenity hotel at these sites would also result in a significant cumulative VMT impact.

APN 6106-027-039/6106-027-028/6106-030-011 (West side of Normandie Avenue)

These parcels are located in TAZ 21229100. According to the City's tool, an amenity hotel project at any of these sites is expected to generate 15.72 VMT per employee. The sites' expected home-based work VMT per employee would exceed the threshold of 14.65 VMT per employee. Since an amenity hotel at these sites is estimated to generate daily home-based work VMT per employee higher than the threshold, it would result in a significant VMT impact.

Since the project threshold is exceeded, an amenity hotel at these sites would also result in a significant cumulative VMT impact.

Given that the expected home-based work VMT per employee that would be generated by an amenity hotel at these parcels is higher than the threshold of 14.65 VMT per employee, amenity hotel projects located at these parcels would result in a significant project impact and significant cumulative impact. Project VMT must be reduced to 14.65 VMT per employee with mitigation in the following areas:

- **APN 4064-023-018/4064-023-034/4064-030-019**: Project VMT must be reduced from 15.12 VMT per employee to 14.65 VMT per employee, representing a 3.1% decrease.
- **APN 6106-027-039/6106-027-028/6106-030-011**: Project VMT must be reduced from 15.72 VMT per employee to 14.65 VMT per employee, representing a 6.8% decrease.

The City of Gardena's guidelines recommend mitigating VMT impacts by reducing the number of single-occupant vehicles generated by a site. This can be accomplished by changing the proposed land use or by implementing Transportation Demand Management (TDM) strategies. The guidelines include recommended mitigation measures for residential, office, retail, and mixed-use developments based on research documented in the California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* (2010).

Given that amenity hotels are employment projects with home-based work VMT as the metric, the commute-focused mitigation measures provided in Table 4.17-1, *Applicable Mitigation Measures*, were selected from the City's list of recommended measures. Note, more recent research published by the San Diego Association of Governments (SANDAG) in June 2019 in the *Mobility Management VMT Reduction*

Calculator Tool – Design Document[37] provides updates to the maximum VMT reductions for an employer transit pass subsidy based on information that has been made available since the publication of the 2010 CAPCOA documentation and also accounts for inflation. Therefore, SANDAG's transit subsidy VMT reduction methodology has been substituted for CAPCOA's.

Table 4.17-1
Applicable Mitigation Measures

Measure	Description	Source
Price Workplace Parking	Pricing workplace parking may include charging for parking, implementing above market rate pricing, validating parking only for invited guests, not providing employee parking and transportation allowances, and educating employees about available alternatives. This strategy focuses on implementing market rate and above market rate pricing to provide a price signal for employees to consider alternative modes for their work commute.	CAPCOA Measure 3.4.14
Rideshare Program	A rideshare program includes TDM strategies designed to increase average vehicle occupancy by encouraging carpooling and vanpooling. Carpooling and vanpooling can be encouraged through programmatic features, such as a platform or database that matches potential riders (e.g., Zimride), and through incentives, such as payments to individuals who participate in each mode.	CAPCOA Measure 3.4.3
Employee Transit Subsidies	Transit subsidies are direct payments to individuals for use of public transit.	SANDAG Measure 1D
Promotions and Marketing	Commute trip reduction marketing programs are part of a traditional TDM program and often focus on advertising non-driving options to individuals. This may include direct outreach, help with trip planning, and development of promotional materials. This strategy can include the deployment of products, such as TransitScreen, that provide real-time transit and other transportation information in common spaces of a development. This strategy's efficacy is affected by the level of investment in the program, the staff involved, and the other measures implemented.	CAPCOA Measure 3.4.7

Source: Kittelson & Associates, *Hotel Development Standards General Plan & Zoning Code Amendment Project Transportation Memorandum* (Transportation Memorandum), dated December 9, 2020; refer to Appendix C, Transportation Memorandum.

These select measures were compared to the VMT reductions necessary for amenity hotel projects in each of the two areas. A menu of mitigation measures (or a combination of measures) that could be applied at each location are detailed below, along with the assumptions necessary to reduce VMT per employee below the threshold of 14.65 VMT per employee; refer to Appendix C for detailed calculations.

Note, the CAPCOA and SANDAG methodologies provide reductions which are sensitive to an area's land use and transportation context (urban, suburban-center, or suburban). For calculation purposes, the City's land use and transportation context were characterized as suburban-center. Definitions for each setting type are provided in Appendix C.

[37] This document can be found online at: https://www.icommutesd.com/docs/default-source/planning/tool-design-document_final_7-17-19.pdf?sfvrsn=ec39eb3b_2

APN 4064-023-018/4064-023-034/4064-030-019

Project VMT must be reduced from 15.12 VMT per employee to 14.65 VMT per employee, representing a 3.1% decrease. Individual TDM measures are sufficient to achieve this reduction, as provided below:

- Implement Price Workplace Parking for a reduction of 3.7%. This assumes 100% of employees would be subject to a $2 per day parking charge.
    - To achieve the necessary 3.1% reduction, a minimum of 84% of employees must be subject to a $2 per day parking charge.
- Implement Rideshare Program for a reduction of 10%. This assumes 100% of employees would be eligible for this program.
    - To achieve the necessary 3.1% reduction, the program must be made available to a minimum of 31% of employees.
- Implement Employee Transit Subsidies for a reduction of 5.2%. This assumes 100% of employees would be eligible for this program.
    - To achieve the necessary 3.1% reduction, the program must be made available to a minimum of 60% of employees.
    - This assumes an LA Metro EZ Pass subsidy of approximately $3.67 per day per employee.
- Implement Promotions and Marketing for a reduction of 4.0%. This assumes 100% of employees would be eligible for this program.
    - To achieve the necessary 3.1% reduction, the program must be made available to a minimum of 78% of employees.

It should be noted that the Price Workplace Parking measure should be complemented by other measures to prevent employee parking spillover onto adjacent streets or residential areas.

Based on the available mitigation measures outlined above, VMT mitigation measures could be applied to amenity hotels at these sites to reduce the significant Project impact and significant cumulative impact to a less than significant level.

APN 6106-027-039/6106-027-028/6106-030-011

Project VMT must be reduced from 15.72 VMT per employee to 14.65 VMT per employee, representing a 6.8% decrease. The following individual TDM measures are sufficient to achieve this reduction:

- Implement Price Workplace Parking for a reduction of 6.8%. This assumes 100% of employees would be subject to a $6 per day parking charge.
    - To achieve the necessary 6.8% reduction, a minimum of 100% of employees must be subject to a $6 per day parking charge.
- Implement Rideshare Program for a reduction of 10%. This assumes 100% of employees would be eligible for this program.

- To achieve the necessary 3.1% reduction, the program must be made available to a minimum of 68% of employees.

It should be noted that the Price Workplace Parking measure should be complemented by other measures to prevent employee parking spillover onto adjacent streets or residential areas.

The following combination of measures can also achieve the necessary 6.8% VMT reduction:

- Implement Employee Transit Subsidies and Promotions and Marketing for a reduction of 9%. This requires 100% of employees being eligible for both programs. This assumes an LA Metro EZ Pass subsidy of approximately $3.67 per day per employee.

Based on the available mitigation measures outlined above, VMT mitigation measures could be applied to amenity hotels at these sites to reduce the significant Project impact and significant cumulative impact to a less than significant level. Therefore, with implementation of Mitigation Measures TRA-1 and TRA-2, which would require implementation of TDM measures, Project and cumulative impacts would be reduced to a less than significant level.

In addition, all amenity hotel developments would be required to comply with Gardena Municipal Code Section 18.68.020, *Transportation demand and trip reduction measures*, which requires a non-residential development of 25,000 square feet or more to provide a bulletin board, display case, or kiosk displaying transportation information located where the greatest number of employees are likely to see it. The information would include, but not be limited to, current maps, routes and schedules for public transit routes serving the site.

Implementation of Mitigation Measures TRA-1 and TRA-2 and compliance with the City of Gardena Municipal Code, would reduce potential VMT impacts associated with the Project to less than significant.

Mitigation Measures:

TRA-1 The hotel operator of an amenity hotel on APN 4064-023-018, APN 4064-023-034, or APN 4064-030-019 shall implement at least one of the following VMT reduction measures:

- Implement Price Workplace Parking for a reduction of 3.7%. This assumes 100% of employees would be subject to a $2 per day parking charge.
  - To achieve the necessary 3.1% reduction, a minimum of 84% of employees shall be subject to a $2 per day parking charge.
- Implement Rideshare Program for a reduction of 10%. This assumes 100% of employees would be eligible for this program.
  - To achieve the necessary 3.1% reduction, this program shall be made available to a minimum of 31% of employees.
- Implement Employee Transit Subsidies for a reduction of 5.2%. This assumes 100% of employees would be eligible for this program.
  - To achieve the necessary 3.1% reduction, this program shall be made available to a minimum of 60% of employees.

- This assumes an LA Metro EZ Pass subsidy of approximately $3.67 per day per employee.

- Implement Promotions and Marketing for a reduction of 4.0%. This assumes 100% of employees would be eligible for this program.
  - To achieve the necessary 3.1% reduction, this program shall be made available to a minimum of 78% of employees.

New employees shall be informed of any rideshare and transit subsidy programs and subsidy program information shall be displayed within areas where the greatest number of employees are likely to see it (consistent with Gardena Municipal Code Section 18.68.020). Verification of the provision of one of the VMT reduction measures shall be provided annually to the City of Gardena Community Development Department.

TRA-2 The hotel operator of an amenity hotel on APN 6106-027-039, 6106-027-028, or 6106-030-011 shall implement at least one of the following VMT reduction measures or combination of measures:

- Implement Price Workplace Parking for a reduction of 6.8%. This assumes 100% of employees would be subject to a $6 per day parking charge.
  - To achieve the necessary 6.8% reduction, a minimum of 100% of employees shall be subject to a $6 per day parking charge.
- Implement Rideshare Program for a reduction of 10%. This assumes 100% of employees would be eligible for this program.
  - To achieve the necessary 3.1% reduction, this program shall be made available to a minimum of 68% of employees.

The following combination of measures can also achieve the necessary 6.8% VMT reduction:

- Implement Employee Transit Subsidies and Promotions and Marketing for a reduction of 9%. This requires 100% of employees being eligible for both programs. This assumes an LA Metro EZ Pass subsidy of approximately $3.67 per day per employee.

New employees shall be informed of any rideshare and transit subsidy programs and subsidy program information shall be displayed within areas where the greatest number of employees are likely to see it (consistent with Gardena Municipal Code Section 18.68.020). Verification of the provision of at least one of the VMT reduction measures or combination of measures specifically identified shall be provided annually to the City of Gardena Community Development Department.

TRA-3 If an amenity hotel is proposed on a site meeting the conditions for an amenity hotel that was not analyzed by the *Hotel Development Standards General Plan & Zoning Code Amendment Project Transportation Memorandum*, prepared by Kittelson & Associates, dated December 9, 2020, the applicant of the proposed development shall prepare a Vehicle Miles of Travel (VMT) analysis in compliance with the City of Gardena SB 743 Implementation Transportation Analysis Updates in effect at that time for review and approval by the City of Gardena Community Development

Department. The applicant shall be required to implement mitigation measures required to reduce potential VMT impacts.

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

Less Than Significant Impact. The proposed amendments to the General Plan and Zoning Code would not change development standards or requirements that would substantially increase hazards due to a geometric design feature. The clean-up language to the Zoning Code involves permitted uses in the C-3 zone to accurately reflect uses that occur and are permitted within the City; the proposed revisions would not introduce new or incompatible uses within the C-3 zone.

As stated, the proposed General Plan and Zoning Code amendments do not involve site-specific development; however, the City anticipates up to four amenity hotels could be accommodated on arterials and major collector streets within the C-2, C-4, M-1, and M-2 zones. Development of parcels with amenity hotels are not anticipated to involve significant modifications to roadways or intersections. Development of a site with an amenity hotel would be reviewed by the City to ensure adequate ingress and egress would be provided and site distance standards would be implemented. Further, development within one of the four identified zones would not introduce incompatible uses. Hotels and motels are currently allowed within these zones with approval of a Conditional Use Permit (CUP). Although amenity hotels would not require a CUP, they would be required to comply with the property development standards established by the Gardena Municipal Code specific to the zone in which the site is located. Property development standards have been established to ensure the development is consistent and compatible with surrounding uses and also takes into consideration the site's specific location, such as its proximity to residentially-zoned properties. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d) Result in inadequate emergency access?

Less Than Significant Impact. The proposed Project would allow for the development of amenity hotels along arterials and major collector streets within the C-3, C-4, M-1, and M-2 zones of the City. Most arterials and major collector streets serve as a primary evacuation and emergency access routes within and out of the City. Future development of amenity hotels is not anticipated to result in the modification of roadways surrounding the specific development site or the placement of any permanent physical barriers on adjacent roadways. There is the potential that traffic lanes located immediately adjacent to a development site may be temporarily closed or controlled by construction personnel during construction activities. Any temporary closure would be required to receive permission from the traffic authority in accordance with Gardena Municipal Code Section 13.56.430, *Road closure or interference with highway use*. However, this would be temporary and emergency access to the site and surrounding area would be required to be maintained at all times. Additionally, all construction staging would be required to occur within the boundaries of the development site and would not interfere with circulation along adjacent or any other nearby roadways.

As site-specific development is not currently proposed, it is unknown if development of an amenity hotel would involve the removal of existing driveways or the construction of new driveways or any associated improvements, such as curb, gutter, and sidewalks. The applicant of any proposed development would be required to submit appropriate plans for plan review to ensure compliance with zoning, building, and fire codes prior to the issuance of a building permit. The Los Angeles County Fire Department (LACFD) would

review the proposed development for access requirements, minimum driveway widths, fire apparatus access roads, fire lanes, signage, access devices and gates, access walkways, among other requirements to ensure adequate emergency access would be provided to and within the site. The proposed development would be required to comply with all applicable Building and Fire Code requirements and would submit construction plans to the Fire Department's Engineering Building Plan Check Unit for review and approval prior to issuance of any building permit. Approval by the Fire Department would ensure that construction and operation would not result in inadequate emergency access and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.18 Tribal Cultural Resources

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

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

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

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

In compliance with both AB 52 and SB 18, the City provided formal notification to those California Native American Tribal representatives requesting notification in accordance with AB 52 and those on the NAHC's list for Tribal Consultation under SB 18; refer to Appendix B. At the time this Initial Study was made available for public review, the City had not received any request for formal consultation. However, the Gabrieleno Band of Mission Indians – Kizh Nation requested consultation for any and all future projects. Mitigation Measure TCR-1 has been included to ensure the Tribe is notified of any future amenity hotel developments and provided the opportunity for consultation at that time.

Site-specific development is not currently proposed. As previously stated, the Project proposes to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City.

As discussed in Response 4.5 (b), recovery of significant archaeological resources is unlikely due to the extensive grading and development that has occurred within the City. In addition, the records searches conducted specific to the 1108 W. 141st Street site indicated that no archaeological or tribal cultural resources have been previously recorded within the area and the potential for prehistoric or historic resource deposits within the site is considered to be low. However, there is the potential for future development of an amenity hotel to affect previously unidentified cultural or tribal cultural resources.

If as part of future development activities, evidence of potential subsurface cultural or tribal cultural resources is found during ground disturbing activities, Condition of Approval (COA) CUL-1 would require construction work to halt until a qualified archaeologist can evaluate the find and if determined to be a "historical resource" or "unique archaeological resource", implementation of avoidance measures or

appropriate mitigation would be required. With implementation of COA CUL-1 and Mitigation Measure TCR-1, potential impacts to tribal cultural resources would be less than significant.

Mitigation Measures:

TCR-1 Within 14 days of determining that an application for an amenity hotel project is complete, the City of Gardena Community Development Department shall provide notification to the designated contact for the Gabrieleno Band of Mission Indians – Kizh Nation, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the Tribe has 30 days to request consultation.

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4.19 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

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

Less Than Significant Impact. As previously stated, the Project proposes to amend the General Plan and Zoning Code to provide for new and revised development standards specific to amenity hotels, provide language to the General Plan Land Use Plan regarding increased FARs allowed under the Zoning Code for specific uses or zones, and to provide other minor clean-up language to the Zoning Code. Although the proposed General Plan and Zoning Code amendments do not involve site-specific development, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. The City anticipates that up to four amenity hotels with up to 450 hotel rooms in total could be accommodated on arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones of the City.

Water

The City is within the service area of Golden State Water Company (GSWC). Potential development of amenity hotels may require installation of new or upgraded water lines within the specific site and connections to existing water mains within the surrounding roadways. The environmental analysis within this IS/MND accounts for likely construction activities for potential amenity hotel developments. The extension of on-site water lines to connect to existing mainlines would not cause a significant environmental effect that cannot be mitigated to a less than significant impact. Development would be required to comply with regulatory requirements and mitigation measures identified within this Initial Study. Impacts would be less than significant.

Refer to Response 4.19 (b) regarding water supply.

Wastewater and Wastewater Treatment

Potential development of amenity hotels may require the installation of new or upgraded sewer lines within the specific site and connections to existing sewer mains within the surrounding roadways. The environmental analysis within this IS/MND accounts for likely construction activities for potential amenity hotel developments. The extension of on-site wastewater lines to connect to existing mainlines would not cause a significant environmental effect. Impacts would be less than significant.

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

Stormwater Drainage

Development of amenity hotels would be allowed on parcels on arterials and major collector streets within the C-3, C-4, M-1, and M-2 zones of the City. As discussed in Response 4.10 (c)(4), most of these sites are paved and it is not anticipated that development of the sites would increase stormwater runoff beyond existing conditions. However, site-specific development would be required to comply with all Gardena Municipal Code requirements for site drainage and water quality; refer to Response 4.10 (a). The applicant of a specific amenity hotel development would be required to demonstrate that the amount of stormwater runoff associated with the proposed development would not be increased beyond existing conditions and that adequate capacity would be available within the City's existing storm drain system. The environmental analysis within this IS/MND accounts for likely construction activities for potential amenity hotel developments. The potential on-site storm drain and water quality facilities would not cause a significant environmental effect. Impacts would be less than significant.

Electricity, Natural Gas, and Telecommunications

The City is within the service area of Southern California Edison (SCE) and Southern California Gas (SoCalGas). Telecommunication services are provided by a variety of companies and are typically selected by the individual customer. Transmission lines/infrastructure for these services are provided throughout the City and serve existing uses.

The Project's anticipated electricity demand would be approximately 6,089 MWh per year. The Project's anticipated natural gas demand would be approximately 236,756 therms per year; refer to Section 4.6, Energy, regarding an analysis of the Project's energy use. The Project would connect to existing electrical, natural gas, and telecommunications infrastructure, and no off-site improvements are proposed. The potential environmental effects associated with the Project's energy demand are analyzed within this Initial Study and impacts have been determined to be less than significant. Thus, the proposed Project

would not require or result in relocation or construction of electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Mitigation Measures: No mitigation measures are required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. Golden State Water Company (GSWC) supplies water to the City of Gardena. GSWC's 2015 Urban Water Management Plan - Southwest (UWMP) Tables 7-2, 7-3, and 7-4 indicate water supplies would meet the service area's water demands for normal, single-dry, and multiple dry-year conditions through 2040. UWMP water demand forecasts are based on adopted General Plans.

As stated, the proposed General Plan and Zoning Code amendments do not involve site-specific development; however, the intent of the proposed modifications, specific to amenity hotels, is to encourage future development of amenity hotels within the City. The City anticipates that up to four amenity hotels with up to 450 hotel rooms in total could be accommodated within the C-3, C-4, M-1, and M-2 zones of the City. Development of sites within the C-3, C-4, M-1, and M-2 zones has been anticipated by the General Plan. Development of up to four amenity hotels would not result in a substantial direct increase in the City's population, as residential uses would not occur. Further, as discussed in Section 4.14, Population and Housing, the jobs that are forecast to be generated by the potential amenity hotels would be within the growth projections associated with the development of non-residential uses anticipated by the General Plan and SCAG's 2016-2040 RTP/SCS. Thus, the Project would not increase growth beyond what was anticipated in the UWMP.

As discussed in Response 4.10 (e), the Project's water demand would total approximately 43.9 acre-feet per year (AFY), which would be within the growth anticipated by the UWMP. Project impacts concerning water demand would be less than significant. Further, GSWC provides conservation programs along with incentives to conserve water in the City. Although the GSWC service area population is expected to increase, according to the UWMP, the overall baseline potable demand in acre-feet per year (AFY) is expected to decrease due to further water use efficiency and recycled water programs.

Mitigation Measures: Less Than Significant Impact.

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

Less Than Significant Impact.

WASTEWATER GENERATION

The environmental analysis anticipates that up to four amenity hotels with up to 450 hotel rooms in total could be accommodated within the C-3, C-4, M-1, and M-2 zones of the City. Some of the potential sites currently generate wastewater requiring conveyance and treatment. Potential development of amenity hotels may require the installation of new or expanded wastewater lines within the specific site and connections to existing sewer mains within the surrounding roadways. Gardena Municipal Code Chapter 13.24, *Sewer Connection Charges*, requires new buildings to pay a fee and obtain a sewer connection

permit to connect to a public sewer. Section 13.24.050, *Determination of capacity*, states that the City Engineer will determine the necessary capacity required by each public sewer to efficiently provide proper sewage collection throughout the City and a building permit will not be issued for a proposed development if it is determined that the anticipated sewage discharge generated by the proposed development would exceed the capacity in the existing sewer system. Building plans would be required to be submitted to the City Engineer to calculate the peak flow sewage discharged to the sanitary sewers. Thus, development of an amenity hotel would not be allowed if adequate capacity was not available or provided as part of the proposed development to serve the wastewater generation. Compliance with the City's established regulatory framework, would ensure adequate capacity would be available to serve the potential development and impacts would be less than significant.

WASTEWATER TREATMENT

Wastewater generated by amenity hotel uses would be treated at LACSD's Joint Water Pollution Control Plant located in the City of Carson. The Plant has a capacity of 400 million gallons per day (mgd) and treats approximately 260 mgd of wastewater.[38] The design capacities of LACSD's facilities are based on the regional growth forecast adopted by SCAG. Expansion of LACSD's facilities must be sized and their service phased in a manner that is consistent with the SCAG regional growth forecast. Because SCAG growth projections are based in part on growth identified in local General Plans, growth associated with development in accordance with the General Plan land use designations and has been anticipated by the growth forecasts. The Project would not amend the City's current land use map.

Hotels and motels are allowed uses within the C-3, C-4, M-1, and M-2 zones with approval of a Conditional Use Permit (CUP). Although the Project would not require a CUP for the development of amenity hotels, the Gardena General Plan anticipates development within the City under buildout conditions, which includes development of all sites within the City. As discussed in Section 4.14, Population and Housing, the jobs that are forecast to be generated by the potential amenity hotels would be within the growth projections associated with the development of non-residential uses anticipated by the General Plan and SCAG's 2016-2040 RTP/SCS. Further, LACSD 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 would be required before any development would be permitted to discharge to the Districts' Sewerage System. Thus, adequate wastewater treatment would be available to serve the potential hotel and restaurant and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

[38] Los Angeles County Sanitation Districts, Facilities, Joint Water Pollution Control Plant, Facilities (lacsd.org), accessed December 8, 2020.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

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

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

State law requires a 65 percent diversion rate for construction and demolition projects. Gardena Municipal Code Chapter 8.20, *Solid Waste and Recyclable Collection and Disposal*, addresses solid waste disposal, including requirements for construction and demolition projects. In accordance with Gardena Municipal Code Section 8.20.060, *Solid waste disposal and diversion*, each construction and demolition project for which a building and/or demolition permit is applied for and approved must achieve the waste diversion performance standard or show a good faith effort to achieve that standard. Compliance with the Gardena Municipal Code would achieve compliance with State law.

Future development of amenity hotels could increase solid waste disposal demands over existing conditions. Solid waste within the City is primarily disposed of at the Chiquita Canyon Sanitary Landfill located at located at 29201 Henry Mayo Drive, Castaic. In 2019, approximately 72 percent of solid waste from Gardena was disposed of at the Chiquita Canyon Sanitary Landfill; the Sunshine Canyon City/County Landfill and the El Sobrante Landfill received approximately 5.1 and 8.5 percent of solid waste from Gardena, respectively.[39] Chiquita Canyon Sanitary Landfill has a maximum permitted throughput of 12,000 tons per day. The facility's maximum capacity is 110,366,000 cubic yards and has a remaining capacity of 60,408,000 cubic yards.[40] It is anticipated that Chiquita Canyon Sanitary Landfill would continue to receive a majority of the solid waste from the City. Solid waste generated from the Project could be accommodated at the Chiquita Canyon Sanitary Landfill or a combination of the disposal facilities currently receive solid waste for disposal from the City.

The City has a per capita disposal rate target of 8.0 pounds per person per day. Since 2012, the City has met this target through its diversion programs with the most recent disposal rate (2018) of 7.5 pounds per person per day.[41] The City would continue to implement its diversion programs and require compliance with all federal, State and local statutes and regulations for solid waste, including those identified under the most current CALGreen standards and in compliance with AB 939. Thus, the proposed Project would result in less than significant impacts concerning solid waste.

Mitigation Measures: No mitigation measures are required.

[39] CalRecycle, Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility, Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility (ca.gov), accessed December 8, 2020.
[40] CalRecycle, SWIS Facility/Site Activity Details, Chiquita Canyon Sanitary Landfill (19-AA-0052), SWIS Facility/Site Activity Details (ca.gov), accessed December 8, 2020.
[41] CalRecycle, Jurisdiction Review Reports, Jurisdiction Review Reports (ca.gov), accessed December 8, 2020.

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4.20 Wildfire

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

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

No Impact. According to the Cal Fire Hazard Severity Zone Map, the City of Gardena is not located within a State Responsibility Area (SRA), nor is the City located within a Very High Fire Hazard Severity Zone (VHFHSZ) within a Local Responsibility Area (LRA).[42] Any future development would be required to comply with all City and LACFD requirements for fire prevention and safety measures, including site access.

The proposed Project would allow for the development of amenity hotels along arterials and major collector streets within the General Commercial (C-3), Heavy Commercial (C-4), Industrial (M-1), and General Industrial (M-2) zones. Most arterials and major collector streets serve as a primary evacuation and emergency access routes within and out of the City. Future development of amenity hotels is not anticipated to result in the modification of roadways surrounding the specific development site or the placement of any permanent physical barriers on adjacent roadways. There is the potential that traffic lanes located immediately adjacent to a development site may be temporarily closed or controlled by construction personnel during construction activities. Any temporary closure would be required to receive permission from the traffic authority in accordance with Gardena Municipal Code Section 13.56.430, *Road closure or interference with highway use*. However, this would be temporary and emergency access to the

[42] Cal Fire, *Fire Hazard Severity Zones Maps*, Welcome to Fire Hazard Severity Zones Maps (ca.gov) accessed December 4, 2020.

site and surrounding area would be required to be maintained at all times. Additionally, all construction staging would be required to occur within the boundaries of the development site and would not interfere with circulation along adjacent or any other nearby roadways. Thus, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan and no impact would occur.

Mitigation Measures: No mitigation measures are required.

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

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

Mitigation Measures: No mitigation measures are required.

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

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

Mitigation Measures: No mitigation measures are required.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

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

Mitigation Measures: No mitigation measures are required.

4.21 Mandatory Findings of Significance

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

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

Less Than Significant Impact With Mitigation Incorporated. As discussed throughout this Initial Study, the Project does not have the potential to substantially degrade the quality of the environmental or result in significant environmental impacts that cannot be reduced to a less than significant level with compliance with the established regulatory framework and implementation of mitigation measures and standard conditions of approval.

As discussed in Section 4.4, Biological Resources, the Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. Future amenity hotel developments would be required to implement Mitigation Measure BIO-1, as applicable, to address the potential for nesting migratory birds within the

trees proposed to be removed as part of the specific site development, which would reduce potential impacts to a less than significant level.

As discussed in Section 4.5, Cultural Resources, the Project would not eliminate important examples of the major periods of California history or prehistory. As also concluded in Section 4.5 and Section 4.18, Tribal Cultural Resources, the Project is not anticipated to result in impacts to known cultural or tribal cultural resources. However, in the unlikely event that buried resources are encountered during ground disturbance activities, Condition of Approval (COA) CUL-1 would ensure activities in the vicinity of the find are halted and appropriate evaluation and treatment of any potential resources occurs.

The Project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant with the implementation of mitigation.

Mitigation Measures: No additional mitigation measures are required.

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

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

Mitigation Measures: No additional mitigation measures are required.

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

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

Mitigation Measures: No additional mitigation measures are required.

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