DRAFT

Initial Study/Mitigated Negative Declaration

Gardena Industrial Center Project

Prepared for:

City of Gardena
1700 West 162nd Street
Gardena, California 90247
Contact: Amanda Acuna, Senior Planner

Prepared by:

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October 2022

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Figures

Tables

Appendices

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°F	degrees Fahrenheit
µg/kg	micrograms per kilogram
µg/L	micrograms per liter
AB	Assembly Bill
ADT	average daily traffic
Alquist-Priolo	Alquist-Priolo Earthquake Fault Zoning Act
AMSL	above mean sea level
AST	aboveground storage tank
bgs	below ground surface
BMP	best management practice
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Occupational Safety and Health Administration
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CAP	climate action plan
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	chlorofluorocarbon
CFG Code	California Fish and Game Code
CFR	Code of Federal Regulations
CH_4	methane
CNDDB	California Rare Plant Rank
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
cy	cubic yard
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
EIR	environmental impact report
FEMA	Federal Emergency Management Agency
FESA	federal Endangered Species Act

GHG	greenhouse gas
GIS	geographic information system
gpm	gallons per minute
GPS	Global Positioning System
GSF	gross square feet
GWP	global warming potential
HFC	hydrofluorocarbon
HRA	health risk assessment
HVAC	heating, ventilation, and air conditioning
I-	Interstate
IS	initial study
L_{dn}	day-night average sound level
L_{eq}	equivalent continuous sound level
L_{max}	maximum sound level
L_{min}	minimum sound level
LOS	level of service
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
MMRP	Mitigation Monitoring and Reporting Program
MMT	millions of metric tons
mpg	miles per gallon
mph	miles per hour
MSCP	Multiple Species Conservation Program
MT	metric ton
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NCCP	natural community conservation plan
ND	negative declaration
NO	nitric oxide
NO_2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O&M	operations and maintenance
O_3	ozone
OEHHA	California Office of Environmental Health Hazard Assessment
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PFC	perfluorocarbon
PM	particulate matter
PM_{10}	particulate matter measuring no more than 10 microns in diameter

$PM_{2.5}$	fine particulate matter measuring no more than 2.5 microns in diameter
Porter-Cologne Act	Porter-Cologne Water Quality Control Act
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	California Public Resources Code
project	Hitco Industrial
RAQS	Regional Air Quality Strategy
RCRA	Resource Conservation and Recovery Act
ROG	reactive organic gas
ROW	right-of-way
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAA	streambed alteration agreement
SB	Senate Bill
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SO_2	sulfur dioxide
SO_x	sulfur oxides
SR-	State Route
SVOC	semivolatile organic compound
SWPPP	stormwater pollutant prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	tribal cultural resource
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Services
USGS	U.S. Geological Survey
UST	underground storage tank
v/c	volume to capacity
VdB	vibration decibel
VMT	vehicle miles traveled
VOC	volatile organic compound

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Document Overview

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared in accordance with California Environmental Quality Act (CEQA) and the CEQA Guidelines for the proposed Gardena Industrial Center Project. The primary intent of this document is to determine whether project implementation would result in potentially significant impacts to the environment.

In accordance with CEQA, projects that have the potential to result in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment must undergo analysis to disclose potential significant effects. The provisions of CEQA apply to California governmental agencies at all levels, including local agencies, regional agencies, state agencies, boards, commissions, and special districts. CEQA requires preparation of an IS for a discretionary project to determine the range of potential environmental impacts of that project and to define the scope of the environment review document. As specified in Section 15064(f) of the CEQA Guidelines, the lead agency may prepare a Mitigated Negative Declaration if, in the course of the IS analysis, it is recognized that the project may have a significant impact on the environment, but that implementation of specific mitigation measures would reduce potentially significant impacts to a less than significant level. As the lead agency for the Proposed Project, the City of Gardena has the principal responsibility for conducting the CEQA environmental review to analyze the potential environmental effects associated with project implementation. During the review process, it was determined that no potentially significant impacts would occur. Therefore, an IS/MND has been prepared for the Proposed Project.

This IS/MND is organized as follows:

- **Section 1: Project Description.** This section introduces the document and discusses the project description including location, setting, and specifics of the lead agency and contacts.
- **Section 2: Initial Study Checklist.** This section discusses the CEQA environmental topics and checklist questions and identifies the potential for impacts.
- **Section 3: List of Preparers.** This section lists the organizations and individuals who were consulted and/or prepared this IS/MND.
- **Section 4: References.** This section presents a list of reference materials consulted during preparation of this IS/MND.

Public Review

The IS/MND will be circulated for a 30-day public review period from October 13, 2022 through November 14, 2022.

Comments regarding this IS/MND must be made in writing and submitted to:

City of Gardena
Community Development Department
1700 West 162nd Street
Gardena, California 90247
Attn: Amanda Acuna, Senior Planner

or by email to AAcuna@cityofgardena.org.

The City invites you to submit written comments describing your specific environmental concerns. If you are representing a public agency, please identify your specific areas of statutory responsibility if applicable. Written comments are desired at the earliest possible date, but due to the time limits mandated by State law, your response must be sent no later than 30 days after the receipt of this notice. If a responsible or trustee agency fails to respond within this time period, the Company may presume that your agency has no response to make pursuant to CEQA Guidelines Section 15082(b)(2).

Section 1 Project Description

The following Initial Study (IS) and Environmental Checklist presents information on the Project and an evaluation of the probable environmental effects anticipated by the Gardena Industrial Center Project (Proposed Project). This Initial Study has been prepared in accordance with the California Environmental Quality Act of 1970 (CEQA), as amended, the CEQA Guidelines, and the City of Gardena's City Guidelines.

1.1 Project Location

The Proposed Project is located at 1600 West 135th Street in the City of Gardena (City). The 296,630 square foot Project Site is located between the following local thoroughfares: 135th Street to the north, 139th Street to the south, Normandie Avenue to the east, and South Western Avenue to the west. The Project Site is approximately 1 mile west of Interstate 110, approximately 1.2 miles south of Interstate (I) 105, and 3.8 miles east and 0.5 miles north of I-405. Figure 1, Regional Location, shows the Project regional location, while Figure 2, Project Site, depicts the Project Site and the surrounding area.

1.2 Environmental Setting

The City of Gardena is located in the South Bay region of the County of Los Angeles (County). The Project Site is in an urban area of the southwest region of the County and is currently occupied by a silica and carbon-based products manufacturing company. Generally, the City is an urbanized community. Surrounding the Project Site is 135th Street to the north and industrial uses to the east, south, and west. The Project Site is located within 0.25 miles of bus stops at the intersection of Western Avenue and 135th Street, which provide service to GTrans Line 2 and Line 4. The City is surrounded by the unincorporated community of Athens to the north, the Los Angeles neighborhood of Harbor Gateway to the east and south, the city of Torrance to the southwest, the Los Angeles neighborhood of Alondra Park and Hawthorne to the west, and the city of Hawthorne to the northwest.

1.2.1 Surrounding Land Uses

The Proposed Project is surrounded by industrial uses on all sides, as well as commercial and residential uses in the peripheral areas. Some residences are located between industrial buildings. The closest residences are located at the intersection of West 135th Street and Halldale Avenue, approximately 350 feet northeast of the Project Site, and near the intersection of West 135th Street and Normandie Drive, approximately 800 feet west of the site. 135th Street Elementary is located further east of the Proposed Project. Purchase Avenue Elementary is located further west of the Proposed Project. Rowley Memorial Park is also located further west of the Proposed Project.

1.2.2 Existing General Plan and Zoning

The Project Site is currently designated as General Industrial by the City of Gardena General Plan Land Use Map and is zoned as General Industrial (M-2).

1.3 Project Description

1.3.1 Proposed Project Description

The Proposed Project involves the demolition of all existing on-site buildings, totaling 296,630 square feet of building space, parking lots, and associated improvements. This consists of buildings 1-13, 21, 32, 44, 46, 51, 65, 69 73 and 75 as shown on Figure 3, Previous Recognized Environmental Conditions. The Proposed Project would entail the demolition of all structures on site. The site has been used to manufacture silica and carbon-based products since original construction. The site was formerly part of a larger property that was occupied by various owners. Most recently, the site has been occupied by Avcorp Composite Fabricators, manufacturers of composite aerospace components. As shown in Figure 4, Site Plan, the Proposed Project consists of a new 190,860-square foot tilt-up concrete industrial building, constituting of 180,860 square feet of industrial uses and 10,000 square feet of office uses. The proposed building has been designed to accommodate up to two tenants with a wide variety of uses, including light assembly, manufacturing, e-commerce, and warehousing/distribution. The Proposed Project is concurrently applying for a conditional use permit (CUP) for warehousing/distribution and a site plan review (SPR).

1.3.2 Proposed Project Design

The forward-looking configuration of the proposed industrial building includes two-story lanterns of glass that accentuate the office corners of the facility creating solid and void in the massing of the 42-foot-tall facilities as shown in Figure 5a, Elevations, and Figure 5b, Elevations. Clearstories of glazing are proposed high on the concrete tilt up panels between the transparent corners providing natural light deep into the building footprint. Concrete panel elements are proposed to be used as accents and multi-colored paint compositions to break down the scale of the concrete tilt up walls. At 36 feet clear, the tall envelope of the building has been designed to accommodate a wide range of users that require efficient facilities.

1.3.3 Open Space and Landscaping

Ten foot setbacks with landscaping along the property lines are proposed for compliance with the development code. The new landscaping would have varied tree species and shrubs with plant species that are consistent with the surrounding area and meet drought tolerant requirements.

1.3.4 Lighting

The Proposed Project is required to comply with the City's requirements for outdoor lighting, which shall demonstrate an average of two footcandles with no single point less than one footcandle for all public/common areas. The Proposed Project's lighting plan would include night lighting for parking areas, walkways, and driveways. Outdoor lights would cast downward and would be shrouded to prevent glare.

1.3.5 Access, Circulation, and Parking

The circulation for the Proposed Project has been designed to ensure the safe and efficient movement of cars and trucks throughout the Project Site. Two 45-feet wide driveways would be provided on West 135th Street. Parking is proposed to be located in surface parking lots on the North side of the proposed industrial building fronting West 135th Street with additional stalls available in the rear of the proposed building. The Proposed Project does not provide more parking than what is required by the City, but includes 220 parking spaces. Parking impacts, in and of themselves, are exempt from CEQA review.

1.3.6 Grading and Drainage

The approximate earthwork numbers are 20,749 cubic yards of cut, 20,749 cubic yards of fill and 17,721 cubic yards of over-excavation as shown in Figure 6a, Grading Plan, and Figure 6b, Grading Plan. The site is expected to balance cut with fill. The Proposed Project includes the construction of low impact development (LID) stormwater management systems. Infiltration is not an option at this site so the site will use two (2) interconnected WetlandMod units (at-grade with plants) and two (2) sets of StormTech MC-3500 detention chambers sized to treat 1.5x the StormWater Quality Design Volume.

1.3.7 Demolition and Construction

The Proposed Project would result in the demolition of the existing buildings and all surface pavements on the site. See Figure 7, Building Numbers, for existing on site buildings.

1.3.8 Project Phasing

The Proposed Project would be implemented in phases upon approval of necessary discretionary actions and permits. The current tenant is set to vacate the site between December 2022 and April 2023. The demolition and construction phases of the Proposed Project are tentatively scheduled to start in 2023 and anticipated to take approximately 12-14 months.

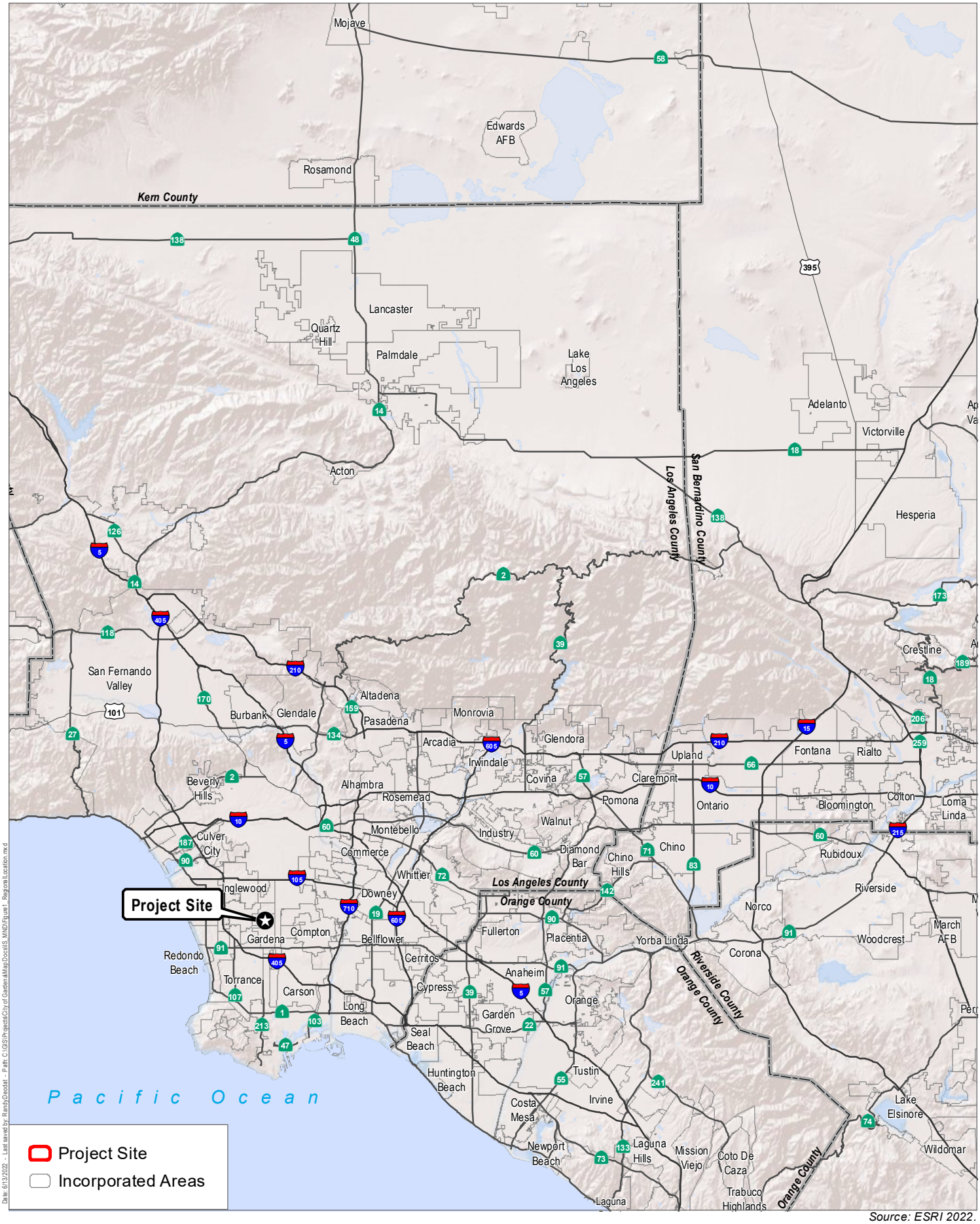
1.4 Project Approvals and Permits

The City is the lead agency under CEQA and has the principal approval authority over the Proposed Project. A responsible agency is a public agency other than the lead agency that has

responsibility for carrying out or approving a project (CEQA Guidelines, Section 15381, and California Public Resources Code, Section 21069). The following discretionary actions would be required to implement the Project (Table 1, Anticipated Discretionary Actions/Approvals).

Table 1. Anticipated Discretionary Actions/Approvals

Lead Agency	Action
City of Gardena	CUP: Conditional Use Permit
	SPR: Site Plan Review
Responsible Agencies	**Action**
Los Angeles Regional Water Quality Control Board.	Approval of a Remedial Action Plan (RAP).



Source: ESRI 2022.

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Figure 1

Regional Location

Gardena Hitco Project

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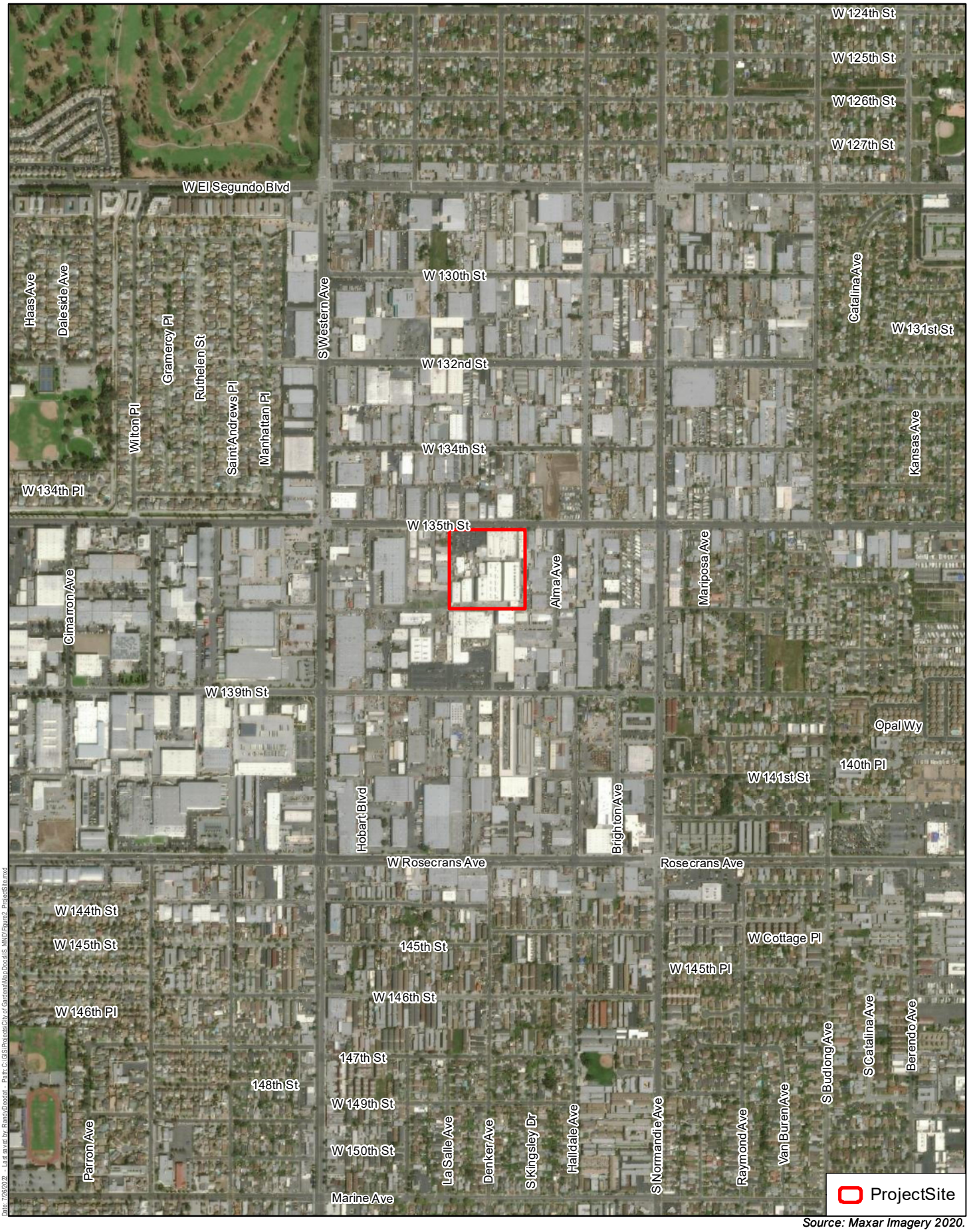

Source: Maxar Imagery 2020.

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Figure 2

Project Site

Gardena Hitco Project

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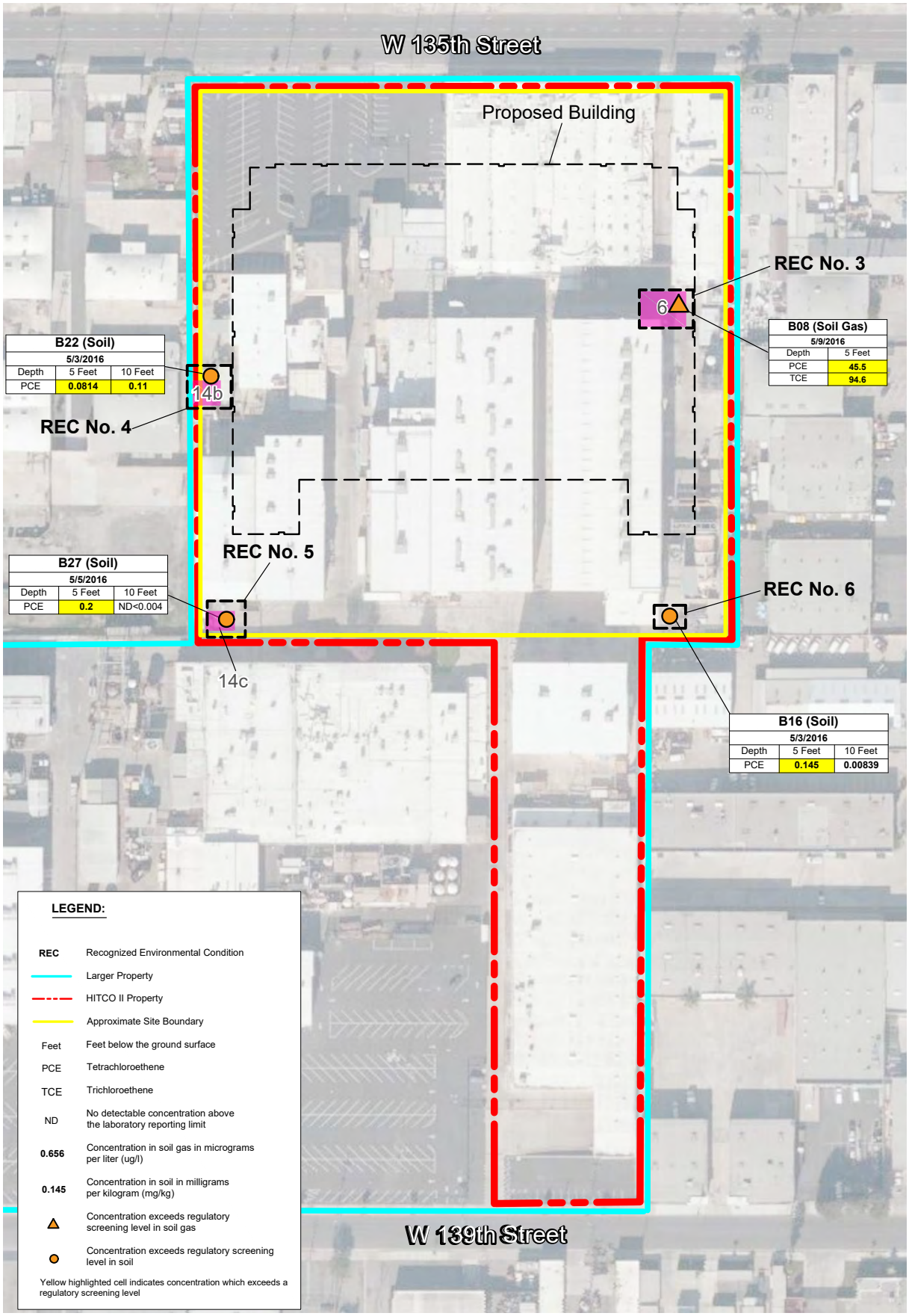

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Source: Enercon 2022.

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Figure 3

Previous Recognized Environmental Conditions

Gardena Hitco Project

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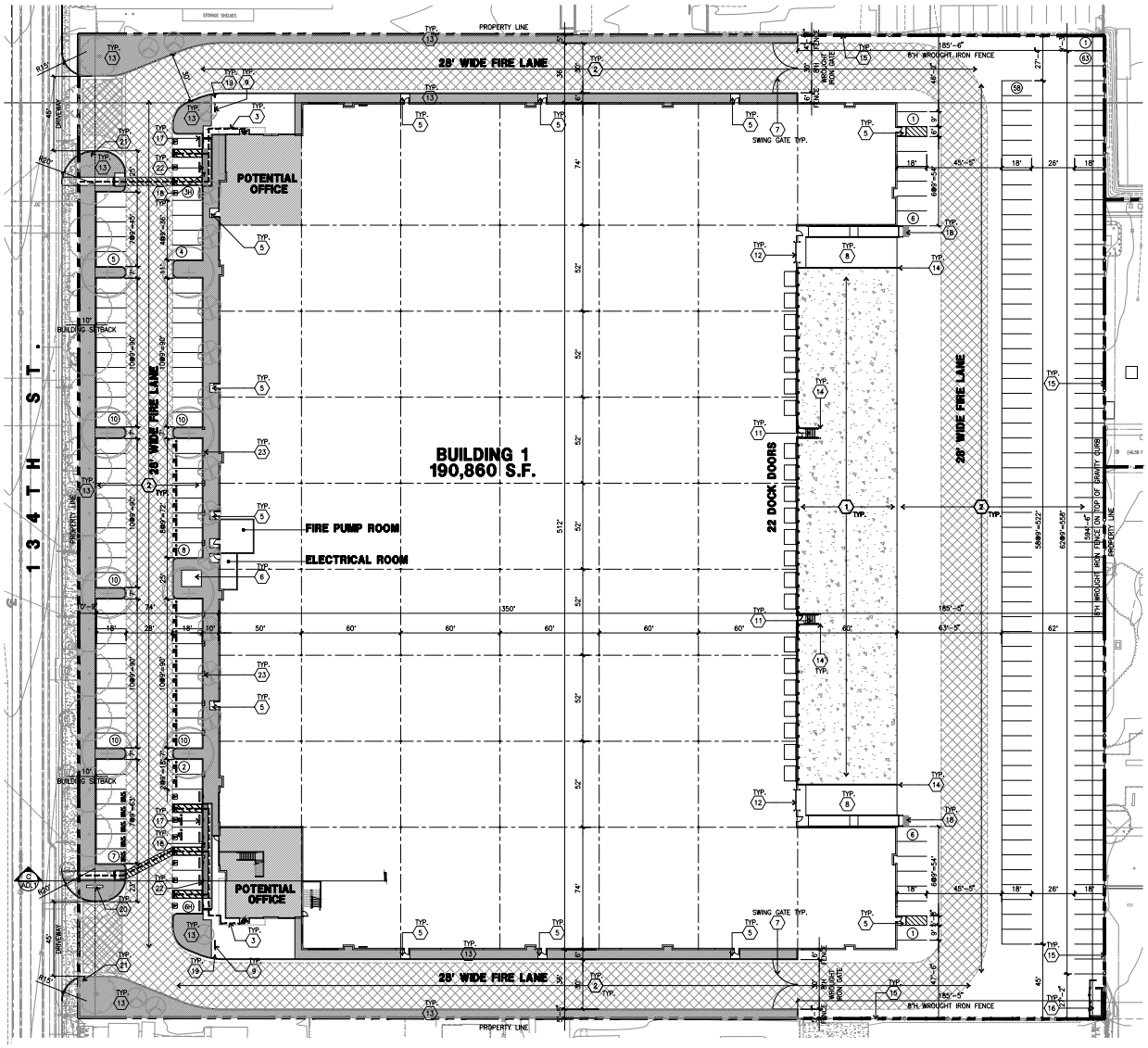

SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT
2. ASPHALT CONCRETE (AC) PAVING
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH
4. NOT USED
5. 5'-0"X5'-0"X4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY AS REQ. BY CITY INSPECTOR.
6. TRANSFORMERS PER ELECTRICAL DRAWINGS AND SERVICE PROVIDER.
7. 8'-0" HIGH METAL SWING GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY. CONTRACTOR TO DESIGN & DETAIL GATES. DRAWINGS AND CALCULATIONS PRIOR TO FABRICATION. PROVIDE CONDUIT FOR FUTURE. CONCRETE RAMP.
8. 5-SPACE BIKE RACK.
9. FIRE HYDRANT W/ CONC. FILLED STEEL GUARD POST
10. EXTERIOR CONCRETE STAIR.
11. 12'W X 14H' OVERHEAD DOOR @ DRIVE THRU.
12. ALL LANDSCAPE AREAS INDICATED BY SHADING
13. CONC. FILLED GUARD POST "6 DIA. U.N.O. 42" H,
14. 8'H WROUGHT IRON FENCE
15. TRASH ENCLOURE
16. PRE-CAST CONC. WHEEL STOP.
17. TRUNCATED DOME.
18. SMOKE POLE
19. FUTURE MONUMENT SIGN
20. ACCESSIBLE ENTRY SIGN.
21. ACCESSIBLE PARKING STALL SIGN
22. FUTURE EV CHARGER, PROVIDE ELECTRICAL CONDUIT

SITE PLAN GENERAL NOTES

1. ALL LIGHTING SHALL CONFORM WITH MUNICIPAL STANDARDS.
2. SEE CIVIL AND STRUCTURAL FOR SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. REFER TO CIVIL PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES. DETAILS ON SHEET AD.1 ARE MINIMUM STANDARDS.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. REFER TO CIVIL DWGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. REFER TO CIVIL DRAWINGS.
8. CONTRACTOR TO REFER TO CIVIL DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. REFER TO CIVIL DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. ALL SIGNAGE SHALL CONFORM WITH THE MUNICIPAL STANDARD.
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. SITE PLAN SHALL MEET ALL ENGINEERING AND NPDES REQUIREMENT.
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. WALLS SHALL BE TREATED WITH A GRAFFITI-PROOF COATING ON SURFACES THAT ARE NOT INTENDED TO BE PAINTED (E.G. SPLIT-FACE BLOCK WALL, DECORATIVE TILE, COLORED PANELING MATERIAL, ETC.).
18. ALL VERTICAL MOUNTING POLES OF CHAIN LINK FENCING SHALL BE CAPPED.
19. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB

PROPERTY OWNER

OVERTON MOORE PROPERTIES
19700 S. VERMONT AVE., SUITE 101
TORANCE, CA 90502
CONTACT: MONTANA KANEN
EMAIL: MKanen@omprop.com

ADDRESS OF THE PROPERTY

1600 & 1606 W. 135TH STREET, GARDENA, CA 90249

ASSESSOR'S PARCEL NUMBER

6102-013-026, 027, & 029

LEGAL DESCRIPTION

LOT 12 AND PORTION OF LOT 13 OF THE REPLAT OF BLOCKS "D" AND "E" OF THE STRAWBERRY PARK TRACT, IN THE CITY OF GARDENA, COUNTY OF LOS ANGLES, STATE OF CALIFORNIA, AS SHOWN ON MAP RECORDED IN BOOK 8, PAGE 138 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

ZONING

GENERAL PLAN DESIGNATION – INDUSTRIAL
ZONING DESIGNATION – M2

APPLICANT

OVERTON MOORE PROPERTIES
19700 S. VERMONT AVE., SUITE 101
TORANCE, CA 90502
CONTACT: MONTANA KANEN
EMAIL: MKanen@omprop.com

APPLICANT'S RESPRESENTATIVE

HPA INC.
18831 BARDEEN AVE., SUITE 100
IRVINE, CA 92612
CONTACT: XIAOMIN LI
TEL: 949-862-2117

SITE PLAN GENERAL NOTES

- CONCRETE PAVING – RE: CIVIL DRAWINGS THICKNESS
- STANDARD PARKING STALL 9'X18'
- ACCESSIBLE PARKING STALL, 9'X18' + 5' W ACCESSIBLE AISLE
- VAN ACCESSIBLE 12'X18' + 5' W ACCESSIBLE AISLE
- CLEAN AIR/VANPOOL/EV
- EV CHARGING STATION 9' X 18'
- LIGHTING FIXTURE
- 28' WIDE FIRE LANE. PROVIDE RED CURBS AND SIGNS PER FIRE DEPT REQUIREMENT
- LANDSCAPE
- PROPERTY LINE
- ACCESSIBILITY PATH OF TRAVEL

PROJECT DATA

	BLDG. 1
SITE AREA	
In s.f.	368,673 s.f.
In acres	8.46 ac
BUILDING AREA	
Office 1st Floor	5,000 s.f.
Office 2nd Floor	5,000 s.f.
Warehouse	180,860 s.f.
TOTAL	190,860 s.f.
COVERAGE	51.8%
AUTO PARKING REQUIRED	
Office: 1/300 sf	33 stalls
Warehouse: 1/1,000 sf	181 stalls
TOTAL	214 stalls
AUTO PARKING PROVIDED	
Standard (9 X 18')	186 stalls
Accessible Standard (9'x18')	5
Accessible Van (12'x18')	2
EVCS Standard (9'x18')	20
EVCS Accessible Standard (9'x18')	1
EVCS Accessible Van (12'x18')	1
Clean Air/Vanpool/EV (9'x18')	5
TOTAL	220
ZONING ORDINANCE FOR CITY	
Zoning Designation - M2	
SETBACKS	
Building	Landscape
Front -10'	10' min on streetfront
Side / Rear - none	5% min of paved area and open parking area
MAXIMUM BUILDING HEIGHT ALLOWED	
Height - 65'	
MAXIMUM FLOOR AREA RATIO	
FAR - 1.0	
LANDSCAPE REQUIREMENT	
Percentage	5%
LANDSCAPE PROVIDED	
Percentage	5.5%
AREA	20,289

Note: Future charging spaces qualify as deignated parking for clean air vehicles per CGBSC 5.106.5.3.5

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Source: HPA Architecture 2022.

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Figure 4
Site Plan

Gardena Hitco Project

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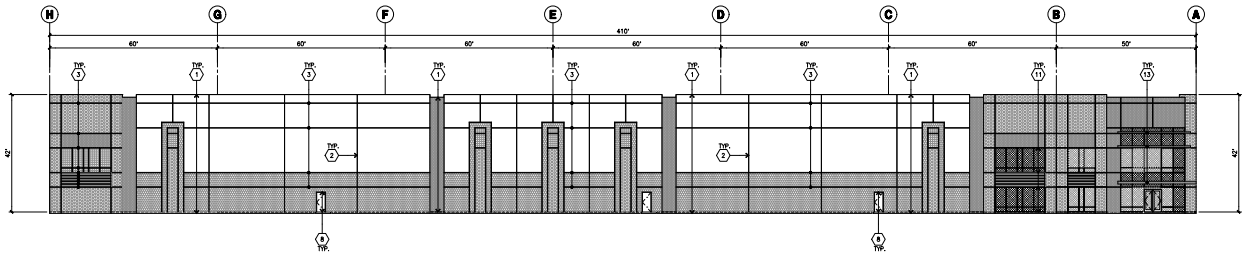
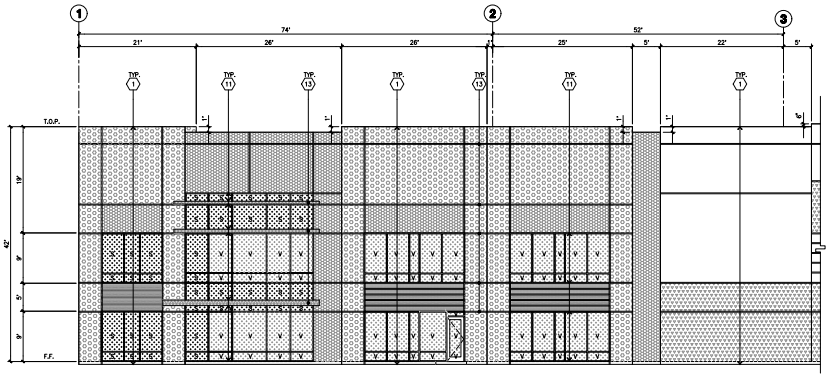


EAST ELEVATION (A)
scale: 1/16" = 1'-0"



ENLARGED NORTH ELEVATION (B)
scale: 1/8" = 1'-0"

KEYNOTES - ELEVATIONS

1. CONCRETE TILT-UP PANEL(PAINTED). FINISH GRADE VARIES. SEE "C" DRAWINGS. WATERPROOF ALL WALLS WHERE GRADE IS HIGHER AND EXPOSED TO THE WEATHER ONE SIDE. WATERPROOFING TO BE PROTECTED WITH PROTECTION BOARD AND A MIN. OF 6" OF GRAVEL. PROVIDE TRENCH DRAIN AT BOTTOM AND DAYLIGHT TO CURB OR TAKE TO STORM DRAIN. NOT REQUIRED AT DOCK HIGH CONDITION OR AT RAMP WALLS.
2. PANEL JOINT.
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/8" CHAMFER. REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. 12'0"x14' OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
5. 9'x10' OVERHEAD DOOR @ DOCK HIGH. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. METAL LOUVER, PAINT COLOR TO MATCH FIELD COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR. PROVIDE FOR RAIN DIVERTER ABOVE DOOR.
9. ROOF LINE BEYOND.
10. DOCK BUMPER
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS, SIDELITES ADJACENT TO DOORS AND GLAZING
12. EXTERIOR DOWNSPOUT WITH OVERFLOW SCUPPERS
13. EXTERIOR CANOPY
14. INTERIOR ROOF DRAIN WITH OVERFLOW SCUPPERS

GENERAL NOTES - ELEVATIONS

A. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE.
B. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
C. T.O.P. EL= TOP OF PARAPET ELEVATION.
D. F.F. = FINISH FLOOR ELEVATION.
E. STOREFRONT CONSTRUCTION: GLASS, METAL ATTACHMENTS AND LINTELS. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
F. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
G. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
H. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH.
J. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
K. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON
P. EXTERIOR WALL SHALL BE PROVIDED WITH A GRAFFITI-RESISTANT COATING OR PAINT, TO A HEIGHT OF 12' FOR BUILDING OR STRUCTURE SURFACES THAT ARE NOT INTENDED TO BE PAINTED (E.G. SPLIT-FACE BLOCK, DECORATIVE TILE, ETC.).

COLOR SCHED. - ELEVATIONS

1	CONCRETE TILT-UP PANEL PAINT BRAND	SHERWIN-WILLIAMS SW7570 EGRET WHITE
2	CONCRETE TILT-UP PANEL PAINT BRAND	SHERWIN-WILLIAMS SW7005 PURE WHITE
3	CONCRETE TILT-UP PANEL PAINT BRAND	SHERWIN-WILLIAMS SW7071 GRAY SCREEN
4	CONCRETE TILT-UP PANEL PAINT BRAND	SHERWIN-WILLIAMS SW7073 NETWORK GRAY
5	CONCRETE TILT-UP PANEL PAINT BRAND	SHERWIN-WILLIAMS SW7074 SOFTWARE
6	CONCRETE TILT-UP PANEL PAINT BRAND	SHERWIN-WILLIAMS SW7602 INDIGO BATIK
7	MULLIONS	COLOR: CLEAR ANODIZED
8	GLAZING	COLOR: BLUE REFLECTIVE GLAZING
9	METAL CANOPY	PAINT BRAND: SHERWIN-WILLIAMS ACRYLIC LATEX SYSTEM HIGH GLOSS/HIGH PERFORMANCE SW7005 PURE WHITE

GLAZING LEGEND

TEMPERED SPANDREL GLASS

TEMPERED VISION INSULATED GLASS
PPG: VISTACOOL (2) PACIFICA + SOLARBAN SOLARBAN 60 (3) CLEAR

Path: C:\GIS\Projects\City of Gardena\Map Docs\IS_MND\Support Files

Source: HPA Architecture 2022.

Harris & Associates

Figure 5a
Elevations

Gardena Hitco Project

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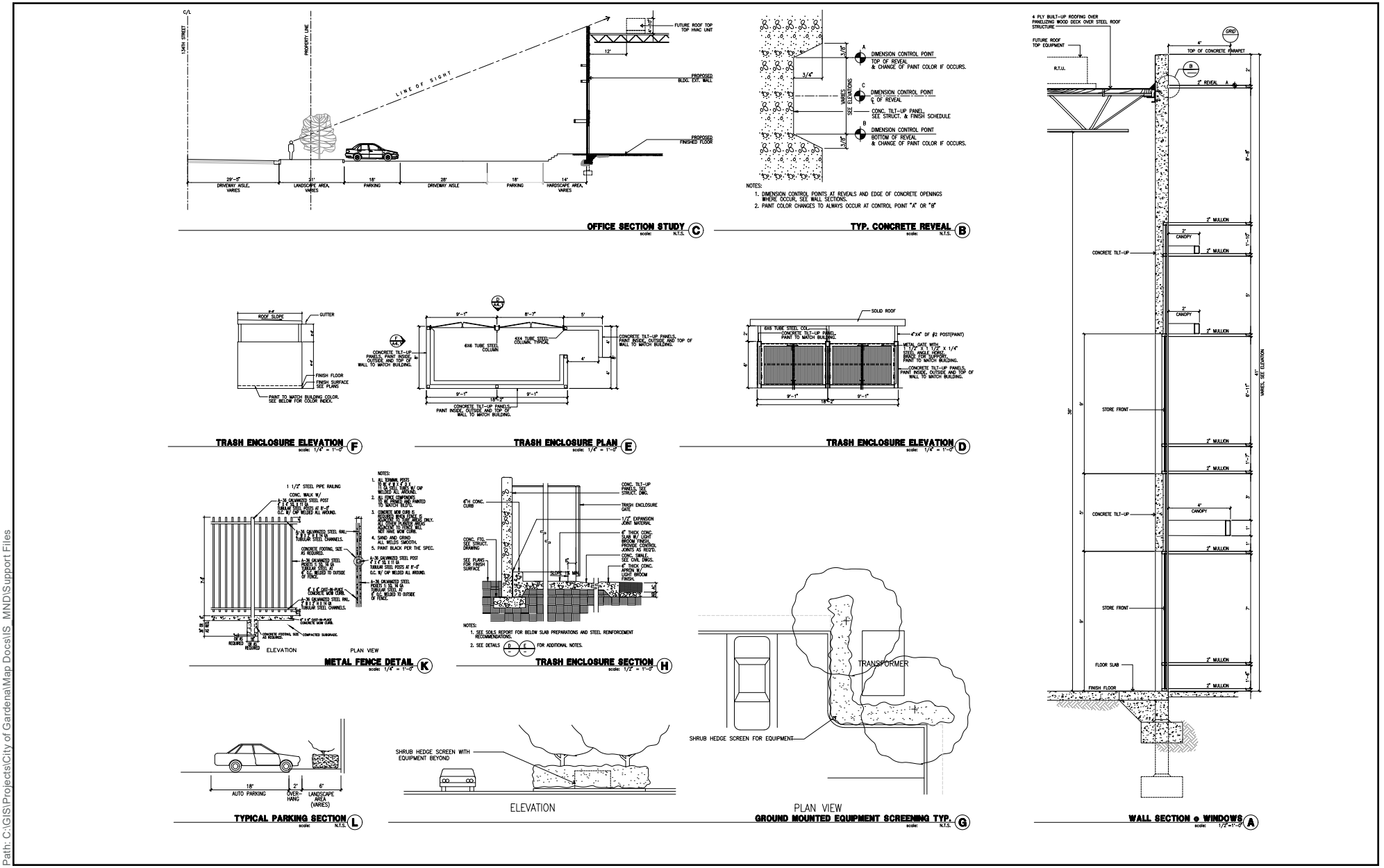

Path: C:\GIS\Projects\City of Gardena\Map Docs\IS_MND\Support Files

Source: HPA Architecture 2022.

Figure 5b

Elevations

Gardena Hitco Project

Harris & Associates

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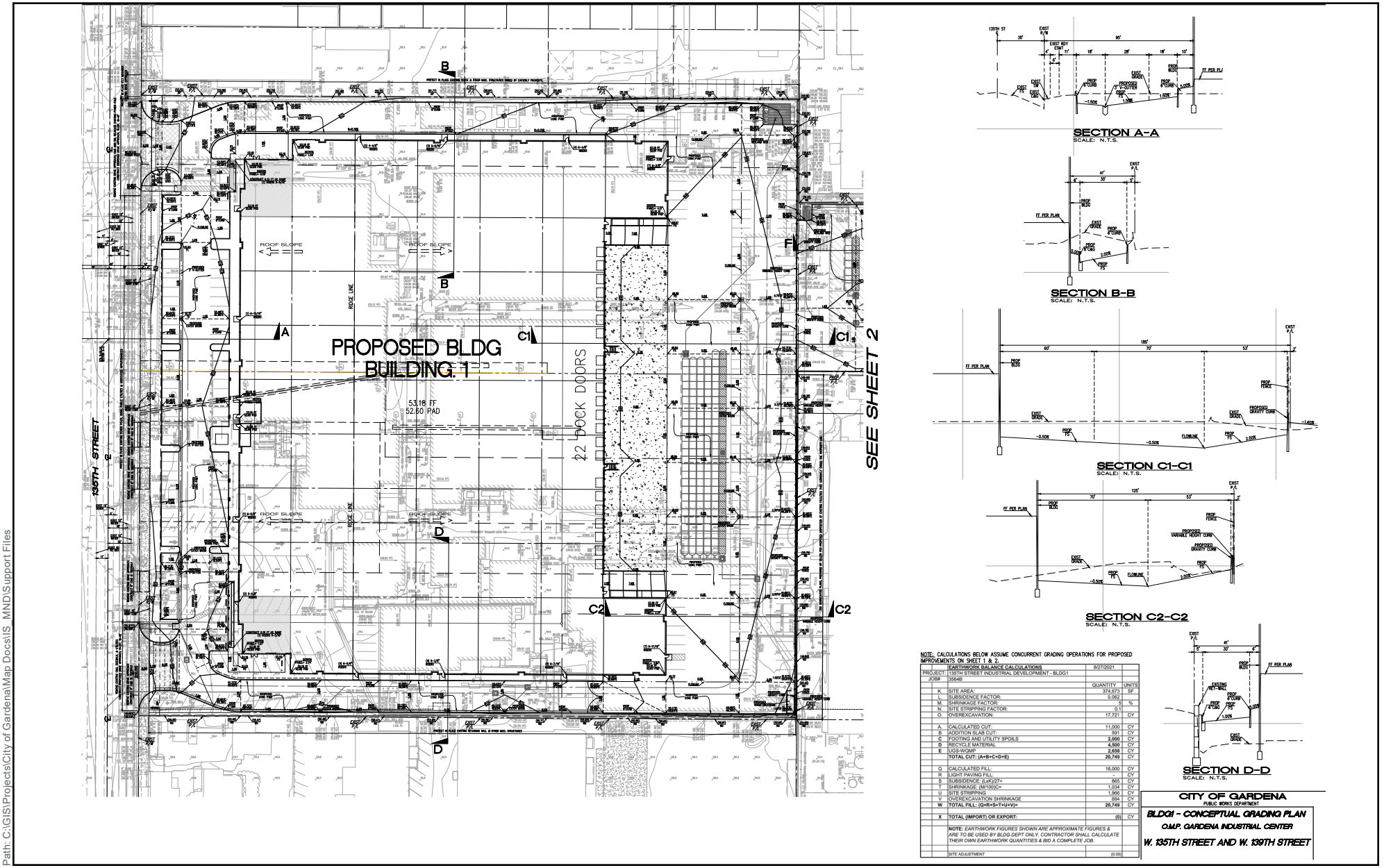

Path: C:\GIS\Projects\City of Gardena\Map Docs\IS_MND\Support Files

Source: Thienes Engineering Inc 2022.

Harris & Associates

0 45 90
Feet

Figure 6a

Grading Plan

Gardena Hitco Project

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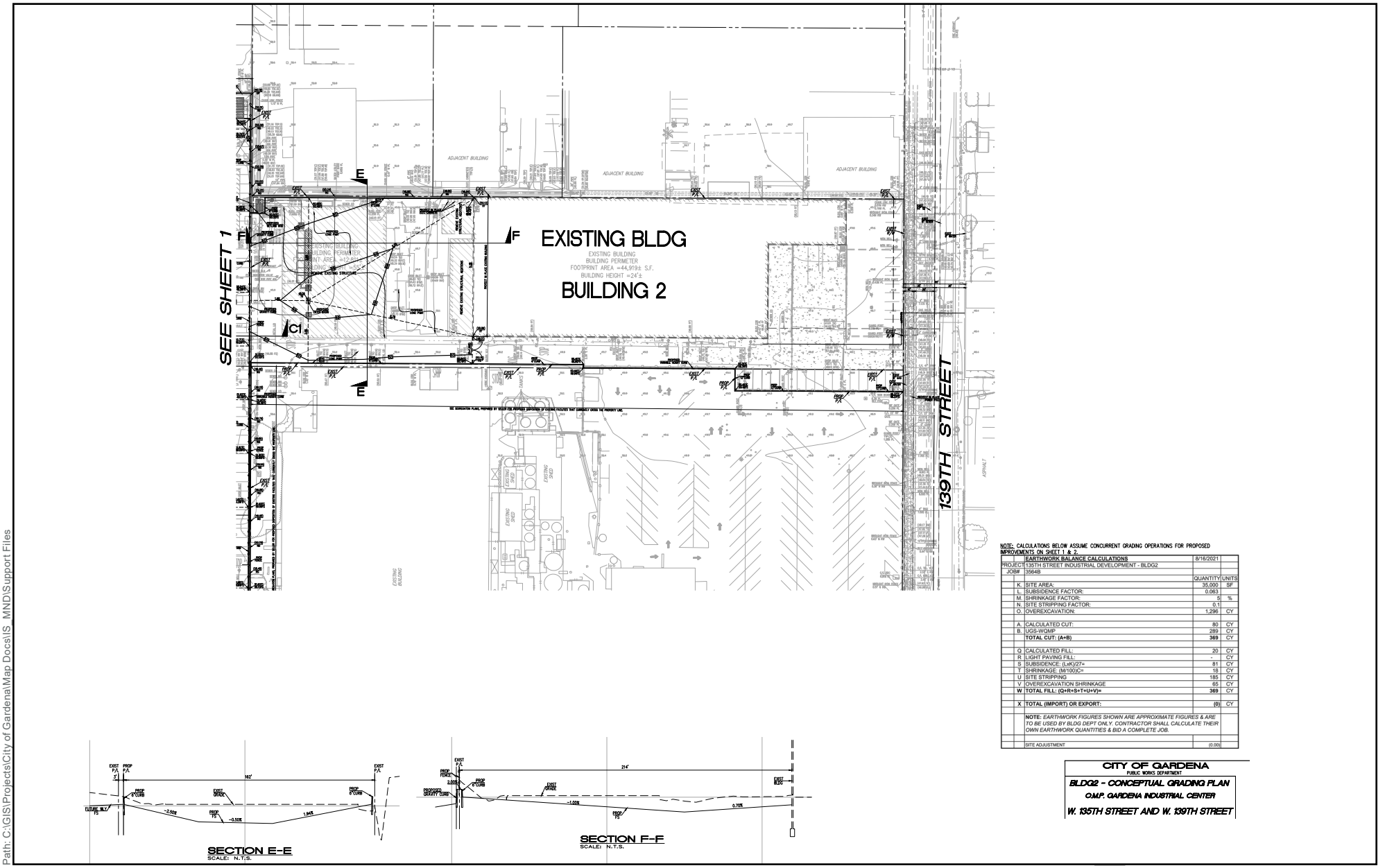

NOTE: CALCULATIONS BELOW ASSUME CONCURRENT GRADING OPERATIONS FOR PROPOSED IMPROVEMENTS ON SHEET 1 & 2.

		EARTHWORK BALANCE CALCULATIONS	8/16/2021	
PROJECT		135TH STREET INDUSTRIAL DEVELOPMENT - BLDG2		
JOB#		3564B		
			QUANTITY	UNITS
	K.	SITE AREA:	35,000	SF
	L.	SUBSIDENCE FACTOR:	0.063	
	M.	SHRINKAGE FACTOR:	5	%
	N.	SITE STRIPPING FACTOR:	0.1	
	O.	OVEREXCAVATION:	1,296	CY
	A.	CALCULATED CUT:	80	CY
	B.	UGS-WQMP	289	CY
		TOTAL CUT: (A+B)	**369**	CY
	Q	CALCULATED FILL:	20	CY
	R	LIGHT PAVING FILL:	-	CY
	S	SUBSIDENCE: (L*K)/27=	81	CY
	T	SHRINKAGE: (M/100)C=	18	CY
	U	SITE STRIPPING	185	CY
	V	OVEREXCAVATION SHRINKAGE	65	CY
	W	**TOTAL FILL: (Q+R+S+T+U+V)=**	**369**	CY
	X	**TOTAL (IMPORT) OR EXPORT:**	**(0)**	CY
		***NOTE:** EARTHWORK FIGURES SHOWN ARE APPROXIMATE FIGURES & ARE TO BE USED BY BLDG DEPT ONLY. CONTRACTOR SHALL CALCULATE THEIR OWN EARTHWORK QUANTITIES & BID A COMPLETE JOB.*		
		SITE ADJUSTMENT	(0.00)	

CITY OF GARDENA
PUBLIC WORKS DEPARTMENT

BLDG2 - CONCEPTUAL GRADING PLAN
O.M.P. GARDENA INDUSTRIAL CENTER
W. 135TH STREET AND W. 139TH STREET

Path: C:\GIS\Projects\City of Gardena\Map Docs\IS_MND\Support Files

Source: Thienes Engineering Inc 2022.

Harris & Associates

N

0 45 90
Feet

Figure 6b

Grading Plan

Gardena Hitco Project

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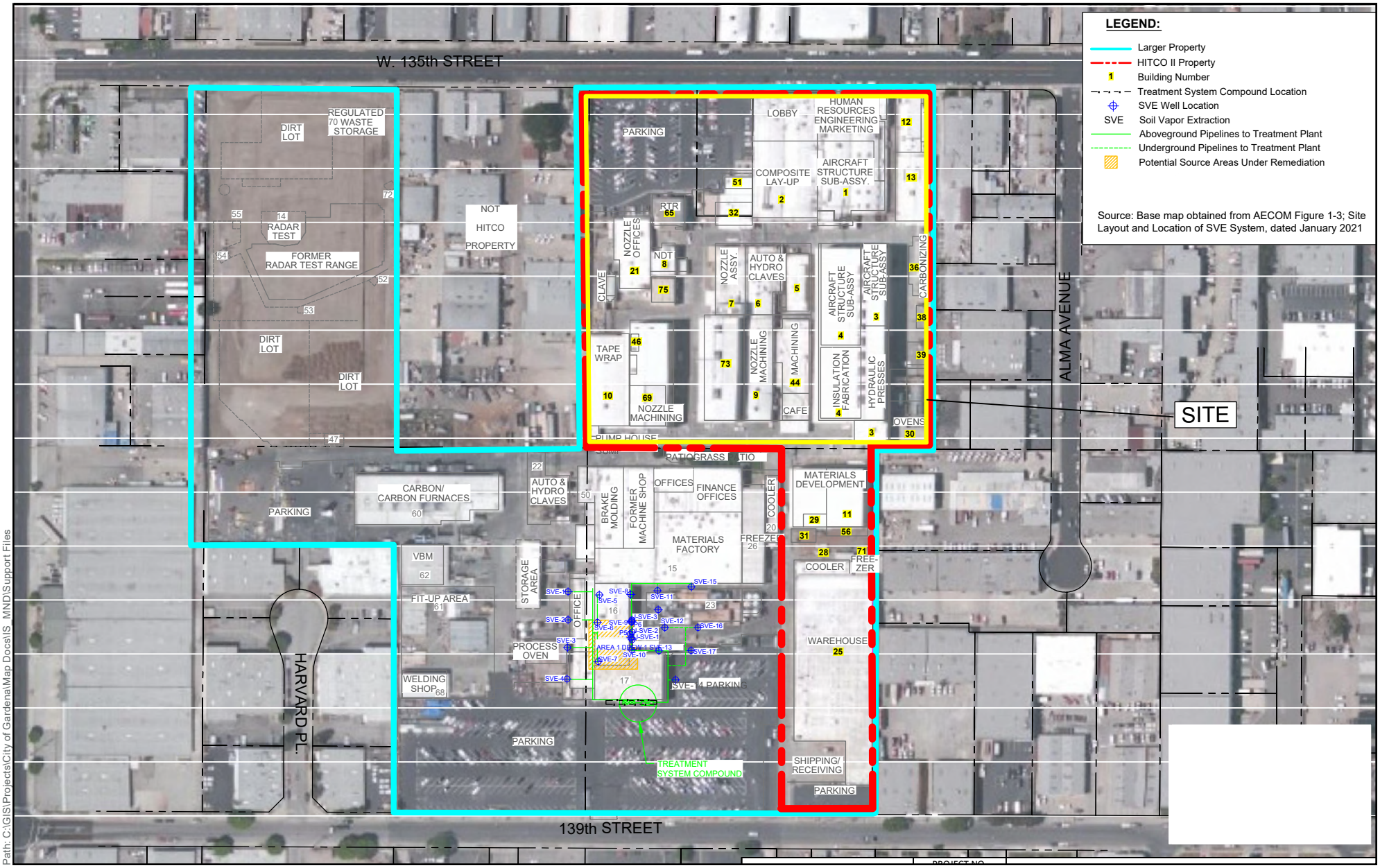

Path: C:\GIS\Projects\City of Gardena\Map Docs\IS_MND\Support Files

Source: Enercon 2022.

Harris & Associates

Figure 7

Building Numbers

Gardena Hitco Project

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Section 2 Initial Study Checklist

The following discussion of potential environmental effects was completed in accordance with Section 15063 of the CEQA Guidelines to determine if the Proposed Project may have a significant effect on the environment.

2.1 Project Information

1. Project title:	Gardena Industrial Center Project
2. Lead agency name and address:	City of Gardena Community Development Department 1700 West 162nd Street Gardena, California 90247
3. Contact person name, address, and phone number:	Amanda Acuna, Senior Planner Community Development Department 1700 West 162nd Street Gardena, California 90247 310-217-9524
4. Project location:	1600 West 135th Street Gardena, California 90249 APNs 6102-013-026, 6102-013-027
5 Project sponsor's name and address:	Gardena Owner LP 19700 S Vermont Ave, STE 101 Torrance, CA 90502
6. General plan designation:	Industrial
7. Zoning:	M-2: General Industrial
8. Description of project:	Refer to Section 1, Project Description, of this IS/MND.
9. Surrounding land uses and setting:	Refer to Section 1 of this IS/MND.
10. Other public agencies whose approval is required:	Los Angeles Regional Water Quality Control Board

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.?	Tribal consultation has been completed in accordance with Assembly Bill 52.

2.2 Environmental Factors Potentially Affected

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

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

2.3 Lead Agency Determination

On the basis of this initial evaluation:

☐ I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent (state), including implementation of the mitigation measures identified herein. 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.

Amanda Acuna — Signature
Amanda Acuna, Senior Planner
City of Gardena

10/12/2022 — Date

2.4 Evaluation of Environmental Impacts

This section documents the screening process used to identify and focus on environmental impacts that could result from the project. The checklist portion of the IS begins below and includes explanations of each CEQA issue topic. CEQA requires that an explanation of all answers be provided along with this checklist, including a discussion of ways to mitigate any significant effects identified. The following terminology is used to describe the potential level of significance of impacts:

- **No Impact.** The analysis concludes that the project would not affect the particular resource in any way.
- **Less than Significant.** The analysis concludes that the project would not cause substantial adverse change to the environment without the incorporation of mitigation.
- **Less than Significant with Mitigation Incorporated**. The analysis concludes that it would not cause substantial adverse change to the environment with the inclusion of mitigation agreed upon by the applicant.
- **Potentially Significant.** The analysis concludes that the project could result in a substantial adverse effect or significant effect on the environment, even if mitigation is incorporated. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

2.4.1 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?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Impact Analysis

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

No Impact. The Project Site is currently occupied by a silica and carbon-based products manufacturing company and is visible from surrounding land uses, including surrounding roadways, as well as commercial areas, industrial areas, and residential areas. The Project Site is not located within a designated scenic vista area, and there are no scenic vistas designated in the City. As such, visual changes at the Project Site would not adversely affect scenic vistas. Implementation of the Proposed Project would replace the existing on-site buildings and parking lots with a new 190,860-square foot tilt-up concrete creative industrial building and associated parking and landscaping. Since there are no scenic vistas in the City, the Project would result in no impact to scenic vistas.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are no eligible or officially designated state scenic highways located in the City (Caltrans 2019). The closest scenic highway to the Project Site is State Route (SR) 1, located in Orange County approximately 8 miles south/southwest of the Project Site. SR-1 is not visible from the Project Site, nor is the Project Site visible from SR-1. As such, the Project would not impact scenic resources in a state-designated scenic highway. Therefore, no impact would occur.

c. Would the project, 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. California Public Resources Code, Section 21071, defines an "urbanized area" as "(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." As of January 2022, the population of Gardena is 59,947 persons (California Department of Finance 2022). However, the City of Torrance borders the City to the south and has a population of 144,433 persons (California Department of Finance 2022). Therefore, the Project is in an urbanized area, and the following analysis considers whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

The Project Site is an infill site in a developed commercial, industrial, and residential area and the Proposed Project would not significantly degrade the existing visual character of the surrounding area. The scale and massing of the proposed building are consistent with surrounding uses. In an effort to ensure that any future changes related to visual character and quality do not result in adverse impacts, and to ensure the proposed industrial structure is visually compatible with surrounding land uses, the Proposed Project would be designed in accordance with the City's Municipal Code, Section 18.36.060, which sets forth development standards for the M-2 zone.

The project would have a maximum height of 42 feet, which is under the maximum allowable height sixty-five (65) feet. The Proposed Project would have a FAR (Floor Area Ratio) of 1.0 for the M-2 zone. The Proposed Project would fall within the allowable setbacks as designated in the M-2 zone, in addition to the minimum distance between buildings. The Project Site is located proximate to a major commercial corridor of Western Avenue in the city. A majority of industrial development is located here and contributes to the highly urbanized nature of the area.

Industrial development along South Western Avenue primarily consists of one- to two-story distribution centers, manufacturing warehouses, and wholesale suppliers. Industrial buildings in the City vary in color; however, the majority consist of off-white, tans, and greys to blues. Residential development near the Project Site, includes residential neighborhoods approximately 350 feet northeast of the Project Site and approximately 800 feet west of the Project Site, consisting of one- to two-story single-family homes, as well as up to three-story multi-family apartment complexes. The Proposed Project would be consistent with the visual character of the area and impacts would be less than significant.

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

Less Than Significant Impact. The Project Site is located in an urbanized area along a main industrial corridor with many surrounding existing sources of light and glare, including streetlights, interior and exterior commercial and residential building lighting, signage lighting, landscape lighting, and security lighting. Nearby sensitive receptors include the residential uses in the periphery of the Project Site.

Construction of the Project would normally occur Monday through Friday between 7:00 a.m. and 6:00 p.m. and Saturday between 9:00 a.m. and 6:00 p.m. Construction activities would typically occur during daylight hours, and nighttime lighting on the Project Site would not typically be required during the construction phase. Therefore, impacts associated with the occasional use of mobile lighting during construction and temporary security lighting would be less than significant.

Existing sources of light on the Project Site include street lights, vehicle headlights, building and security lights, and parking lot lights. Surrounding uses also include a variety of urban and residential uses. Implementation of the Proposed Project would introduce new light sources; however, the lighting would be consistent with existing lighting on site and in the area. The Proposed Project would be consistent with Section 18.42.150 of the City's Municipal Code, which establishes lighting and security standards. Additionally, all proposed light fixtures would be consistent with the California Green Building Standards Code (CALGreen) and the Building Energy Efficiency Standards - Title 24 California Code of Regulations, which set forth minimum requirements based on Lighting Zones. These requirements are designed to minimize light pollution in an effort to maintain dark skies and ensure new development reduces backlight, uplight, and glare (BUG) from exterior light sources (CALGreen 2019). The Project Site is located within Lighting Zone 3, which establishes ambient illumination standards for urban areas (California Administrative Code 2019). The Project would be required to comply with the maximum allowable BUG rating for Lighting Zone 3, as defined in Table 5.106.8 [N] of CALGreen.

With adherence to the above standards for illumination and implementation of the previously outlined design considerations, operational lighting would not adversely affect nighttime views in the area, or result in a new source of substantial light and impacts would be less than significant.

Glare is caused by light reflections from pavement, vehicles, and building materials, such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on intensity and direction of sunlight. Glare can create hazards to motorists and can be a nuisance for pedestrians and other viewers. Proposed exterior building materials primarily include metal trim, concrete panels, and glass windows. Although metallic materials and glass have been incorporated into project design, the façades of the new buildings would not create substantial glare that would affect daytime views. Metallic materials would typically be finished and display a dull veneer.

Selected glass would have a low exterior reflectance percentage to maximize daylighting opportunities to interior building spaces. Therefore, building materials would not create a new source of substantial light or glare that would adversely affect daytime views in the area. With adherence to the above design standards and regulations, proposed building materials and lighting would not result in substantial glare that would be received by off-site receptors. Further, the Project would be required to comply with the California Green Building Code, which establishes maximum allowable BUG ratings, which include backlight, uplight, and glare. Therefore, glare impacts would be less than significant.

2.4.2 Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

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

No Impact. The Project Site is located in a highly urbanized area. According to the California Department of Conservation's (DOC) California Important Farmland Finder, most of the County—including the City—is not mapped under the Farmland Mapping and Monitoring Program, and, thus, does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide

Importance (collectively Important Farmland) (DOC 2019a). Therefore, no impacts associated with conversion of Important Farmland would occur.

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

No Impact. According to the California Department of Conservation's Williamson Act Parcel map for Los Angeles County, the Project Site is not located on or adjacent to any lands under a Williamson Act contract. The Project Site is not zoned for agricultural use, and no Williamson Act contract exists for the site (DOC 2017). In addition, the Project Site and surrounding area are not zoned for agricultural uses, but instead for residential, commercial, industrial, and public facility uses (City of Gardena 2021). Therefore, the Proposed Project would not conflict with existing zoning for agricultural use or with a Williamson Act contract. Therefore, no impact would occur.

c. Would the project 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))?

No Impact. The Project Site is located within a highly urbanized area. According to the City's Zoning Map, the Project Site is not located on or adjacent to forest land, timberland, or timberland zoned Timberland Production (City of Gardena 2021). Therefore, no impact would occur.

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

No Impact. The Project Site is located in a highly urbanized area. The Project Site is not located on or adjacent to forest land. No forest land, private timberlands or public lands with forests are located in the City. Therefore, no impact would occur.

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

No Impact. See Section 2.4.2(a). The Project Site is not located on or adjacent to any parcels identified as Important Farmland or forestland. In addition, the Project would not involve changes to the existing environment that would result in the indirect conversion of Important Farmland or forestland located away from the Project Site. Therefore, no impact would occur.

2.4.3 Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	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?	☐	☐	☒	☐
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)?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Impact Analysis

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

Less Than Significant Impact. The Project is in the SCAB, which includes portions of Los Angeles, Riverside and San Bernardino counties and all of Orange County. This area covers approximately 12,000 square miles. The SCAQMD consists of the four counties in the SCAB; therefore, the City is within the jurisdiction of the SCAQMD. The SCAQMD significance criteria are used in this analysis to determine the Project's impact on air quality based on the SCAQMD California Environmental Quality Act (CEQA) Air Quality Guidelines.

SCAQMD administers SCAB's Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP for the SCAB is the 2016 AQMP (SCAQMD 2017), which was adopted by SCAQMD's Governing Board in March 2017. The 2016 AQMP focuses on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities seeking to promote reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017). An update to the AQMP to address ozone nonattainment, the 2022 AQMP, is currently underway, but has not yet been adopted, however, a draft is available at this time and is dated May 2022.

The purpose of a consistency finding with regard to the AQMP is to determine if a project is consistent with the assumptions and objectives of the regional air quality plans and if it would

interfere with the region's ability to comply with federal and state air quality standards. SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, of the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993). These criteria are:

- Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion, project-generated criteria air pollutant emissions have been analyzed for significance and are addressed under Section 2.4.3(b). As presented in Section 2.4.3(b), construction and operation of the Project would not generate criteria air pollutant emissions that exceed SCAQMD's thresholds.

The second criterion regarding the Project's potential to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (SCAG 2020). This document, which is based on general plans for cities and counties in the SCAB, is used by SCAQMD to develop the AQMP emissions inventory (SCAQMD 2017). The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).The SCAG 2016-2040 RTP/SCS and the associated Regional Growth Forecast are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans.

The Project Site is currently designated as General Industrial by the City of Gardena General Plan Land Use Map and is zoned as General Industrial (M-2), which does not allow residential development. Based on the maximum allowable lot coverage of 50 percent and the maximum building height of 45 feet (three stories assumed) for the existing M-2 General Industrial zone, the industrial capacity of the site is approximately 200,000 sf. The main source of emissions from the land use development would be vehicle trips; however, the number of daily trips would decrease, not increase, as a result of the completion of the Proposed Project as compared to the existing use.

Modeling conservatively assumes that the Project would be developed as a manufacturing facility, which would result in a reduction of 178 daily trips compared to existing conditions. If the Project operates as a warehousing use, it is anticipated to result in a reduction of 728 daily trips compared to existing conditions. If the Proposed Project is developed as a high-cube distribution center, it is anticipated to result in a reduction of 784 daily trips. Therefore, emissions from development of the Proposed Project can be assumed to have been accounted for in the AQMP. Therefore, impacts relating to the Project's potential to conflict with or obstruct implementation of the applicable AQMP would be less than significant.

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

Less Than Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality.

In considering cumulative impacts from the Project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the SCAB is designated as nonattainment for the CAAQS and NAAQS. If a project's emissions would exceed SCAQMD's significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. If a project does not exceed thresholds and is determined to have less than significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality. The basis for analyzing the Project's cumulatively considerable contribution is if the Project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact) and consistency with SCAQMD's 2016 AQMP, which addresses cumulative emissions in the SCAB. Table 2, South Coast Air Quality Management District Air Quality Mass Daily Thresholds, details the SCAQMD construction and operation significance thresholds for a project.

Table 2. South Coast Air Quality Management District Air Quality Mass Daily Thresholds

Pollutant	Construction Threshold (pounds/day)	Operational Threshold (pounds/day)
CO	550	550
NO_x	100	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_x	150	150
VOC	75	55

Source: SCAQMD 2019.

Notes: CO = carbon monoxide; NO_x = nitrogen oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; SO_x = sulfur oxides; VOC = volatile organic compound

The SCAQMD also identifies localized significance thresholds (LSTs), as shown in Table 3, Source Receptor Area Southwest Coastal Los Angeles County Localized Significance Thresholds, to determine if impacts to air quality are significant based on localized exceedances of the federal and or state ambient air quality standards. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor. LSTs are identified for NO_2, CO, PM_{10}, and $PM_{2.5}$ generated on a project site. Localized construction and operational emissions thresholds are determined as a function of the disturbance area (acres) and receptor distance (meters) from the boundary of a site. The maximum disturbance area for the LSTs is 5 acres. The Project Site is approximately 8.46 acres; however; for the purposes of this analysis, the most conservative LSTs (1-acre disturbance) are used to screen for potential localized impacts from Project construction. The nearest receptor distance is approximately 100 meters. The LSTs applicable to the Project are listed in Table 3.

Table 3. Source Receptor Area Southwest Coastal Los Angeles County Localized Significance Thresholds

Air Pollutant	Allowable Emissions (pounds/day)	
	Construction	Operation
NO_x	107	107
CO	1,156	1,156
PM_{10}	28	7
$PM_{2.5}$	9	3

Source: SCAQMD 2009.

Notes: CO = carbon monoxide; NO_x = nitrogen oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter

Construction

Project construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2020.4.0, based on construction information provided by the City and model default assumptions. Project construction is anticipated to last for 12 to 14 months, which is consistent with the CalEEMod default schedule assumptions for the Project. A total of 296,630 square feet of existing development on the Project Site would be demolished and hauled away. Cut and fill would be balanced on site, and no import or export is assumed. Modeling assumes implementation of the SCAQMD Rule 403 for fugitive dust control, which includes the following dust control measures during ground-disturbing activities: replacing ground cover in disturbed areas quickly, watering exposed surfaces at least two times daily, implementing equipment loading/unloading procedures to reduce fugitive dust, managing dust by watering two times daily, and reducing speed on unpaved roads to less than 15 miles per hour.

Maximum daily emissions levels associated with construction of the Project are shown in Table 4, Estimated Construction Daily Maximum Air Pollutant Emissions (pounds/day). As shown in Table 4, the Project would not exceed SCAQMD construction thresholds for any pollutant. Therefore, the Project would not result in a significant impact related to criteria pollutant emissions during construction. Because emissions of criteria pollutants under the Project would be below applicable thresholds, which are established to assist in maintaining or achieving regional attainment in the SCAB, construction would not result in a cumulatively considerable contribution to regional acute and long-term health impacts related to non-attainment of the ambient air quality standards.

Table 4. Estimated Construction Daily Maximum Air Pollutant Emissions (pounds/day)

Construction Phase	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Demolition	2	28	22	<1	7	2
Site preparation	3	28	19	<1	10	6
Grading	2	18	15	<1	4	2
Building construction and coating	29	18	25	<1	4	1
Paving	2	10	15	<1	1	<1
Maximum Daily Emissions	**29**	**28**	**22**	**<1**	**10**	**6**
SCAQMD Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*

Source: CalEEMod, version 2020.4.0. See Attachment 1 for model output (Appendix B, Air Quality Memo).

Notes: CO = carbon monoxide; NO_X = oxides of nitrogen; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; SO_X = oxides of sulfur; VOC = volatile organic compound

Emission quantities are rounded to the nearest whole number. Exact values are provided in Attachment 1 (Appendix B).

Operation

Area sources of air pollutant emissions associated with the Project include fuel combustion emissions from space and water heating, fuel combustion emissions from landscape maintenance equipment, VOC emissions from periodic repainting of interior and exterior surfaces, and natural

gas use. Vehicles trips generated by the Project would also contribute to regional emissions of criteria pollutants. However, the Project Site is currently developed with similar facilities. Operational emissions from existing land uses and the Project are modeled with CalEEMod to estimate the net change in emissions as a result of project implementation. Vehicle trip data was obtained from the Project's Transportation Impact Analysis (Gibson 2022). The Project is anticipated to result in a net decrease in vehicle trips compared to existing conditions. Modeling conservatively assumes that the Project would be developed as a manufacturing facility, which would result in a reduction of 178 daily trips compared to existing conditions. If the Project operates as a warehousing use, it is anticipated to result in a reduction of 728 daily trips compared to existing conditions. If the Project is developed as a high-cube distribution center, it is anticipated to result in a reduction of 784 daily trips.

The total estimated and net changes in operational emissions from project implementation are provided in Table 5, Operational Daily Maximum Air Pollutant Emissions. As shown in Table 5, operational emissions from the Project would not exceed any of the SCAQMD significance thresholds and would result in a net decrease from existing conditions. Air quality impacts associated with operation of the Project would be less than significant.

Table 5. Operational Daily Maximum Air Pollutant Emissions

Emissions Source	Maximum Daily Emissions (pounds/day)					
	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Existing Conditions						
Area sources	5	<1	<1	<1	<1	<1
Energy sources	<1	1	1	<1	<1	<1
Vehicular sources	4	4	43	<1	10	3
Existing Total Operational Emissions	**9**	**5**	**44**	**<1**	**10**	**3**
Proposed Project						
Area sources	4	<1	<1	<1	<1	<1
Energy sources	<1	1	1	<1	<1	<1
Vehicular sources	3	4	36	<1	9	2
Total Project Operational Emissions	**8**	**5**	**37**	**<1**	**9**	**2**
Net Change from Project	***(1)***	***0***	***(7)***	***0***	***(1)***	***(1)***
Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*

Source: CalEEMod, version 2020.4.0. See Attachment 1 for model output (Appendix B, Air Quality Memo).

Notes: CO = carbon monoxide; NO_x = nitrogen oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; SO_2 = sulfur dioxide; VOC = volatile organic compound

Emissions quantities are rounded to the nearest whole number. Exact values are provided in Attachment 1 (Appendix B).

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

Less Than Significant Impact. Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups

include children, older adults, people with acute illnesses, and people with chronic illnesses, especially those with cardiorespiratory diseases.

Residential areas are also considered sensitive to air pollution because residents tend to be home for extended periods of time, resulting in sustained exposure to any pollutants present. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. Industrial, commercial, and office areas are considered the least sensitive to air pollution. Exposure periods associated with these land use types are relatively short and intermittent because the majority of workers tend to stay indoors most of the time. The Project Site is in a primarily industrial area; however, some residences are located between industrial buildings. The closest residences are at the intersection of West 135th Street and Halldale Avenue, approximately 350 feet northeast of the Project Site, and near the intersection of West 135th Street and Normandie Drive, approximately 800 feet west of the Project Site.

Carbon Monoxide

CO is a colorless, odorless, poisonous gas produced by combustion processes, primarily mobile sources. When CO gets into the body, it combines with chemicals in the blood and prevents blood from providing oxygen to cells, tissues, and organs. Because the body requires oxygen for energy, high-level exposure to CO can cause serious health effects, including death (USEPA 2021b).

Nitrogen Oxides

NOx is a general term pertaining to compounds including nitric oxide (NO), nitrogen dioxide (NO2), and other oxides of nitrogen. NOx is produced from burning fuels, including gasoline, diesel, and coal. NOx reacts with volatile organic compounds (VOCs) to form ground-level O3 (smog). NOx is linked to a number of adverse respiratory systems effects (USEPA 2021d).

Ozone

Ground-level O3 is not emitted directly into the air but is formed by chemical reactions of "precursor" pollutants (NOx and VOCs) in the presence of sunlight. Major emissions sources include NOx and VOC emissions from industrial facilities and electric utilities, motor vehicle exhaust, gasoline vapors, and chemical solvents. O3 can trigger a variety of health problems, particularly for sensitive receptors, including children, older adults, and people of all ages who have lung diseases, such as asthma (USEPA 2021c).

Particulate Matter

Particulate matter includes dust, metals, organic compounds, and other tiny particles of solid materials that are released into and move around in the air. Particulates are produced by many

sources, including the burning of diesel fuels by trucks and buses, industrial processes, and fires. Particulate pollution can cause nose and throat irritation and heart and lung problems. Particulate matter is measured in microns, which are 1 millionth of a meter in length (or 1 thousandth of a millimeter). PM10 is small (i.e., respirable) particulate matter measuring no more than 10 microns in diameter, while PM2.5 is fine particulate matter measuring no more than 2.5 microns in diameter (CARB 2020b).

Sulfur Dioxide

SO_2 is formed primarily by the combustion of sulfur-containing fossil fuels, especially at power plants and industrial facilities. SO_2 is linked to a number of adverse effects on the respiratory system (USEPA 2022).

Toxic Air Contaminants

TACs are generated by a number of sources, including stationary sources such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources such as automobiles; and area sources such as landfills. The two primary emissions of concern regarding health effects for land development projects are CO and diesel particulate matter (DPM). The health effects of CO are described above. DPM is a mixture of many exhaust particles and gases that is produced when an engine burns diesel fuel. Compounds found in diesel exhaust are carcinogenic. Some short-term (acute) effects of diesel exhaust exposure include eye, nose, throat, and lung irritation and headaches and dizziness. Long-term exposure is linked to increased risk of cardiovascular, cardiopulmonary, and respiratory disease and lung cancer (OSHA 2013).

Construction

Construction equipment exhaust combined with fugitive particulate matter emissions have the potential to expose sensitive receptors to criteria air pollutant emissions because these emissions would occur in the construction area. Consistent with SCAQMD methods, off-site vehicle and truck trips that would be spread out over commute and haul routes are not included in the LST analysis (SCAQMD 2008). As described above, project construction is compared to the most conservative LSTs for the project receptor area and receptor distance. As shown in Table 6, Estimated Construction Daily Maximum Air Pollutant Emissions (pounds/day) Relative to Localized Significance Thresholds.

Table 6. Estimated Construction Daily Maximum Air Pollutant Emissions (pounds/day) Relative to Localized Significance Thresholds

Construction Phase	NO_x	CO	PM_{10}	$PM_{2.5}$
Demolition	21	20	6	2
Site preparation	28	18	10	6
Grading	18	15	4	2
Building construction and coating	15	18	1	1
Paving	10	15	<1	<1
Maximum Daily On-Site Emissions	**28**	**20**	**10**	**6**
1-Acre LST (allowable emissions)	**107**	**1,156**	**28**	**9**
Significant Impact?	*No*	*No*	*No*	*No*

Source: CalEEMod, version 2020.4.0. See Attachment 1 for model output (Appendix B, Air Quality Memo).

Notes: CO = carbon monoxide; LST = localized significance threshold; NO_X = nitrogen oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; SO_X = sulfur oxide; VOC = volatile organic compound

Emission quantities are rounded to the nearest hundredth. Exact values are provided in Attachment 1 (Appendix B).

Relative to Localized Significance Thresholds, project construction emissions would not exceed these LST thresholds. On-site construction associated with Project construction would not result in a significant impact to sensitive receptors. In addition to the potential for localized impacts described previously, construction has the potential to result in DPM emissions. The Project would result in a short-term addition of truck trips occurring over a few months. However, the Project Site is currently a source of truck trips, so the net change in trips during the construction period would not be substantial as there are existing truck trips currently. Total construction emissions would be below SCAQMD significance thresholds for particulate matter. Construction associated with implementation of the Project would not result in a significant impact to sensitive receptors related to DPM.

Operation

Regarding sensitive receptors, the Project Site is currently developed with industrial uses in an existing industrial area. Operation of the Project would be similar to existing conditions. As shown previously in Table 5, the project would result in a net decrease in vehicle emissions compared to existing site operations. Therefore, the Project does not propose any new facilities that would require a health risk assessment for sensitive receptors.

Future project tenants are currently unknown; however, equipment that would result in potential TAC emissions would require permitting from the SCAQMD. Additionally, because the Project would result in a net decrease in vehicle trips, implementation of the Project would not contribute to any CO hotspots. Therefore, impacts to sensitive receptors would be less than significant.

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

Less Than Significant Impact. Construction associated with the Proposed Project could result in minor amounts of odor compounds associated with diesel-heavy equipment exhaust. In addition, the Project could produce objectionable odors during construction from paving, painting, and equipment operation; however, these substances, if present, would be minimal and temporary. Impacts associated with odors during construction would not result in nuisance odors that would result in a significant impact.

The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). The Project would consist of a new 190,860- square foot tilt-up concrete creative industrial building and would not create any new sources of substantial odor during operation. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the Proposed Project would not create objectionable odors and impacts would be less than significant.

Construction of the Project could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust. However, all diesel equipment would not be operating at once, and construction near individual receptors would be temporary. Additionally, SO_x is the only criteria air pollutant with a strong, pungent odor (ATSDR 2015). Maximum construction emissions of SO_x would be less than 1 pound per day, which is well below the SCAQMD long-term threshold of 150 pounds per day. Therefore, impacts associated with odors during construction would not result in nuisance odors that would result in a significant impact.

Sources of odor as identified above and in the SCAQMD CEQA Air Quality Handbook would not occur on site. Future Project tenants are currently unknown; however, the proposed building would not accommodate the types of uses that create objectionable orders described above. Additionally, SCAQMD Rule 402 prohibits nuisance odors. Therefore, there would be no long-term operational impacts associated with odors, and this impact would be less than significant.

2.4.4 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?	☐	☐	☐	☒
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 US 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

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

No Impact. The Project Site is located in a developed part of the City and is surrounded by industrial uses on all sides, as well as commercial and residential uses in the peripheral areas. The nearest open space area as identified by the City's General Plan is Rowley Memorial Park, which is located approximately 0.67 miles west of the Project Site (City of Gardena 2021). No native habitat is located on the Project Site or in the immediately surrounding area. The Project Site consists of a flat, fully developed lot. Plant species surrounding the Project Site are limited to non-native,

ornamental species located within the public right-of-way. These non-native, ornamental plant species form a non-cohesive plant community that is not known to support any candidate, sensitive or special-status plant species.

As previously mentioned, ornamental landscape trees are found within the public right-of-way. Pursuant to Chapter 13.60.110 of the City's Municipal Code, removal of a City tree would require the applicant to obtain a written permit from the City prior to removing a tree located on public property (City of Gardena 2022). However, according to the Project Site plan, trees would not be removed from the public right-of-way. Therefore, the Project would result in no impact to any species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

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

No Impact. The Project Site is located in a predominantly urbanized area, and consists of a flat, fully developed lot. Surrounding land uses include industrial uses on all sides, as well as commercial and residential uses in the peripheral areas. The Project Site does not contain any riparian habitat or other sensitive natural community. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, that are known to provide habitat for sensitive wildlife or plant species, or that are known to be important wildlife corridors. Riparian habitats are those occurring along the banks of rivers and streams. No sensitive natural community or riparian habitat are on site. Therefore, no impact would occur.

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

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support and that normally does support a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. There are no state or federally protected wetlands located on or near the Project Site. Further, no federally defined waters of the United States or state occur within the Project Site. This includes the absence of federally defined wetlands and other waters (e.g., drainages) and state-defined waters (e.g., streams and riparian extent) (USFWS 2021). Therefore, no impact would occur.

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

No Impact. Wildlife movement corridors facilitate movement of species between large patches of natural habitat. The Project Site is already fully developed except for non-native landscaping materials and, therefore, lacks suitable habitat for wildlife species and is not a native wildlife nursery site. However, several ornamental trees and other vegetation are on site that require removal, and these may be used for nesting by migratory birds, which are protected under the federal Migratory Bird Treaty Act (USC 16 703–712). The Migratory Bird Treaty Act governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The Act prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations. If removal of the vegetation occurs during nesting season (typically between February 1 and September 1), the project applicant is required to conduct nesting bird surveys in accordance with the California Department of Fish and Wildlife requirements prior to removal of the trees. Compliance with the Migratory Bird Treaty Act would ensure that no significant impacts to migratory birds occur. Additionally, the Project Site is located within a highly urbanized area and would not interfere with the movement of any native residents, migratory fish, or wildlife species. Therefore, no impact would occur.

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

No Impact. As previously mentioned, ornamental landscape trees are found within the public right-of-way. Pursuant to Chapter 13.60.110 of the City's Municipal Code, removal of a City tree would require the applicant to obtain a written permit from the City prior to removing a tree located on public property (City of Gardena 2022). However, according to the Project Site plan, trees would not be removed from the public right-of-way. Therefore, the Project would result in no impact to any species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Notably, the City is located in a highly urbanized and dense area. The City is nearly entirely developed, with the exception of a few vacant infill parcels throughout the community. There are no expansive open space areas, natural features or sensitive natural plant communities, or riparian habitats for which to consider conservation (City of Gardena 2010). Therefore, no impact would occur.

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

No Impact. The Project Site is not located within any habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan area. Therefore, the Project would not conflict with the provisions of an adopted conservation plan, and no impact would occur.

2.4.5 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 Section 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Impact Analysis

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

Less Than Significant Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered "historically significant" if it meets one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
2. Is associated with the lives of persons important in our past
3. Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values
4. Has yielded, or may be likely to yield, information important in prehistory or history

The Project Site is located within an urbanized area and is fully developed. Historic aerials from 1952 through 2018 were reviewed, and eleven of the structures within the Project area of potential effect (APE) were constructed more than 50 years ago. The structures are identified as buildings 1 and 2, 3, 4, 5, 10, 12 and 13, 21, 32, and 65. The architectural style of all but one structure is considered Vernacular Industrial and the function of the structures has been primarily manufacturing. Descriptions of the structures are provided below.

Buildings 10, 12 and 13, and 65 are concrete tilt-up structures over concrete slab. These buildings have metal roll-up style doors, and those that contain windows are multi-pane, steel casement style. All have flat roofs and exterior equipment is either attached to the side or top of the buildings. Building 10 also has standard style, exterior doors and large fixed picture windows. Buildings 12 and 13 are one building; however, the portion identified as Building 13 is at a lower height.

Buildings 3, 4, 5, 21, and 32 are corrugated metal buildings on concrete slabs. They have flat roofs, metal roll-up and/or standard exterior doors, and no windows except for Building 21 that had a large window in the past that is currently replaced with metal sheeting. In addition, this building has an awning on the northeast side, of which the purpose is unclear as there is no door or window at this location. Equipment is attached to the side or top of the buildings. Between 1998 and 1999, an addition was constructed on the southwest side of Building 4, and additions to the north side of Building 32 occurred in 1995 and 2012.

Buildings 1 and 2 are one combined building with different architectural styles. Building 1 is a Quonset style brick building with an addition that was added to the east side of the building. The addition is constructed of brick, and multi-pane, steel casement style windows are present on the addition. At the northerly end of the building, another later addition was constructed. It is adjacent to 135th Street, and is two-story, and of frame-stucco construction with a flat roof. Windows include large, picture frame, and fixed, three-pane styles. The roof is flat and surrounded by a façade. Material awnings are present on the first floor to provide shade where windows and doors are present. Building 2 is also an addition that is located to the west of Building 1. It is a combination of concrete tilt-up and metal corrugated construction with roll up metal and swing exterior doors. Similar to the other buildings, equipment is attached to the side or top of the buildings.

The property is currently used for aerospace manufacturing. The buildings are used for office, manufacturing, and warehouse purposes. The property was initially developed in the 1940s by Zenith Plastics (1947-1956). Other previous owners include 3M Company (1956-1961), H.I. Thompson Company (i.e., HITC; 1960-1961), Armco Steel (1969-1985), Owens-Corning Fiberglass Corporation (1985-1987), BP Advanced Materials (BP, 1987-1995), HITCO Technologies, Inc. (1995-1997), HITCO Carbon Composites, Inc. (1997-present), and AV Corp (2015-present).

The buildings are in fair to good condition. None of the buildings are associated with a historic event or persons important to the past, nor do they have an architectural style of note. They do not embody the distinctive characteristics of a type, period, region or method of construction, or represent the work of an important creative individual, or possess high artistic values. They are not likely to yield information important in history beyond what has been documented with this evaluation. None of the buildings are on federal, state, or local lists of designated historic resources and are not eligible for listing. The development is not historically significant, and therefore, the redevelopment would not cause a substantial adverse change in the significance of a historical resource.

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

Less Than Significant Impact. The Project Site is located within an urbanized area and is fully developed. Any archaeological resources, which may have existed at one time (on or beneath the

site), have likely been previously disturbed or destroyed. Nonetheless, construction activities associated with project implementation have the potential to unearth undocumented resources. In the event that archaeological resources are discovered during project subsurface activities, all earth-disturbing work within a 25-foot radius must be temporarily suspended or redirected until an archaeologist meeting the Secretary of the Interior's Standards Professional Qualification Standards has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. With implementation of this standard requirement, a less than significant impact would occur.

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

Less Than Significant Impact. California Health and Safety Code, Section 7050.5, requires that in the event that human remains are discovered on a Project Site, disturbance of the site shall halt and remain halted until the County Coroner has conducted an investigation into the circumstances, manner, and cause of any death and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to their authorized representative. If the County Coroner determines that the remains are not subject to their authority and if the County Coroner has reason to believe the human remains are those of a Native American, they shall contact the Native American Heritage Commission by telephone within 24 hours. The Proposed Project would comply with existing law, and potential impacts to human remains would be less than significant.

2.4.6 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?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Impact Analysis

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

Less Than Significant Impact. The existing site currently includes fuel use (i.e., motor gasoline) from vehicles to and from the existing businesses, electricity use from lighting the existing buildings, and natural gas use from water heating. Energy use for the existing site was estimated using the CalEEMod model (Version 2020.4.0) as part of the greenhouse gas (GHG) emissions modeling for the Project. Vehicle fuel use was calculated by the California Emissions Estimator Model (CalEEMod) output, based on traffic data from the Project's Transportation Impact Analysis (Gibson 2022), and kilogram/carbon dioxide (kg/CO_2) per gallon conversion factors from the U.S. Environmental Protection Agency (USEPA) (2021) for motor gasoline. Table 7, Existing Energy Use, shows the existing energy use on site. A quantification of existing energy use compared with proposed energy use is discussed below.

Table 7. Existing Energy Use

Energy/Fuel Type	GHG Emissions (MT CO_2e)	Amount
Electricity	342	1,921,152 kWh/yr
Natural Gas	192	3,575,859 KBTU/yr
Fossil Fuel	1,594	180,220 gallons

Sources: CalEEMod Version 2040.4.0, USEPA 2021

Notes: GHG = greenhouse gas; KBTU/yr = kilo British thermal unit per year; kWh/yr = kilowatt-hour per year; MT CO_2e = metric tons of carbon dioxide equivalent

Assumes a conversion factor of 10.21 kg/CO_2 for diesel fuel and 8.78 kg/CO_2 for motor gasoline. Detailed calculations are provided in Attachment 1, Fuel Use Calculations (Appendix D, Energy Memo).

Project Construction

Construction of the Project would require temporary energy demand. Construction energy impacts involve the one-time, non-recoverable energy costs associated with construction of structures and associated site features. During construction, the Project would result in an increase in energy

consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment and the use of electricity for small tools and other sources. Construction of the Project would require demolition, grading, building construction, paving, and landscaping installation. All construction would be typical for the region and building type. The Proposed Project does not include unusual circumstances that would require unusually high energy use for construction, such as helicopter delivery or highly specialized construction waste disposal requirements.

Fuel consumption from construction of the Project was calculated using the CalEEMod annual carbon dioxide equivalent (CO_2e) emissions output prepared for the Project GHG emissions analysis and the kg/CO_2 conversion factors from the USEPA (2021) for diesel fuel and motor gasoline. Total diesel fuel use and motor gasoline consumption from operation of construction equipment, haul truck trips, vendor truck trips, and worker vehicle trips is in Table 8, Construction Diesel Fuel and Gasoline Use. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. Natural gas is not anticipated to be used during construction.

Table 8. Construction Diesel Fuel and Gasoline Use

Fuel Type	GHG Emissions (MT CO_2e)	Gallons
Diesel Fuel	537	52,637
Motor Gasoline	171	19,445

Sources: CalEEMod 2020.4.0; USEPA 2021 (conversion factors).

Notes: GHG = greenhouse gas; MT CO_2e = metric tons of carbon dioxide equivalent

Includes fuel use from construction equipment, haul truck trips, vendor truck trips, and worker vehicle trips. Assumes a conversion factor of 10.21 kg/CO_2 for diesel fuel and 8.78 kg/CO_2 for motor gasoline. Detailed calculations are provided in Attachment 1 (Appendix D, Energy Memo).

Project Operation

Operation of the Project would consume energy for things such as water heating, refrigeration, lighting, and electricity. The following includes energy use estimates for electricity, natural gas, and vehicle fuel (fossils fuels) from implementation of the Project. Similar to existing energy use, energy use associated with the Proposed Project was obtained from the Project GHG analysis and was calculated using the CalEEMod output and the kg/CO_2 conversion factors from the USEPA (2021) for diesel fuel and motor gasoline. Electricity, natural gas, and fuel use from the Project are separately compared to existing conditions below.

Operation of the Proposed Project would consume electrical energy for several purposes, including but not limited to lighting and equipment operation. Table 9, Existing and Project Electricity Use, shows existing electricity use on site compared with the Project.

Table 9. Existing and Project Electricity Use

Scenario	GHG Emissions (MT CO_2e)	kWh/yr
Existing	342	1,921,152
Proposed Project	302	1,692,813
Net Electricity Use	**(40)**	**(228,339)**

Sources: CalEEMod 2040.4.0

Notes: GHG = greenhouse gas; kWh/yr = kilowatt-hour per year; MT CO_2 = metric tons of carbon dioxide equivalent

Operation of the Project would consume natural gas for several purposes, including but not limited to water heating. Table 10, Existing and Project Natural Gas Use, shows existing natural gas use on site compared with the Proposed Project.

Table 10. Existing and Project Natural Gas Use

Scenario	GHG Emissions (MT CO_2e)	KBTU/yr
Existing	192	3,575,859
Proposed Project	206	3,754,650
Net Natural Gas Use	**14**	**178,791**

Sources: CalEEMod 2040.4.0

Notes: GHG = greenhouse gas; KBTU/yr = kilo British thermal unit per year; MT CO_2 = metric tons of carbon dioxide equivalent

Vehicles trips to and from the Project Site would result in fuel consumption. Table 11, Existing and Proposed Project Vehicle Fuel Use, shows the net fuel use from implementation of the Project compared with existing conditions. Vehicle trip data was obtained from the Project's Transportation Impact Analysis (Gibson 2022). This estimate is conservative because it assumes that the Project would be developed as a manufacturing facility, which would result in a reduction of 178 daily trips compared to existing conditions. If the Project operates as a warehousing use, it is anticipated to result in a reduction of 728 daily trips compared to existing conditions. If the Project is developed as a high-cube distribution center, it is anticipated to result in a reduction of 784 daily trips.

Table 11. Existing and Proposed Project Vehicle Fuel Use

Scenario	GHG Emissions (MT CO_2e)	Gallons
Existing	1,594	180,220
Proposed Project	1,399	158,268
Net Fuel Use	**(194)**	**(21,952)**

Sources: CalEEMod output 2020.4.0; USEPA 2021 (conversion factors).

Notes: GHG = greenhouse gas; MT CO_2 = metric tons of carbon dioxide equivalent

Assumes a conversion factor of 10.21 kg/CO_2 for diesel fuel and 8.78 kg/CO_2 for motor gasoline. Detailed calculations are provided in Attachment 1 (Appendix D, Energy Memo).

The Project would be subject to the Title 24 Building Energy Efficiency Standards, which apply to new construction and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting, as further discussed below. Compliance with the most recent applicable Building Energy Efficiency Standards would ensure that the energy efficiency of the proposed buildings is maximized

to the extent feasible. The most recent adopted standards, the 2019 Building Energy Efficiency Standards, include requirements for photovoltaic systems and features such as insulation requirements to reduce electricity demand from the energy grid. The Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

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

Less Than Significant Impact. The Project would result in a net decrease in electricity and fossil fuel use compared to existing conditions. The Project would result in a net increase in natural gas use. However, the Project does not include any features that would result in or encourage the wasteful, inefficient, or unnecessary consumption of energy. The net increase in natural gas would likely be less than demonstrated in Table 10, above, because the CalEEMod modeling does not take into account that the Project would be subject to more stringent Title 24 Building Energy Efficiency Standards compared to the existing buildings. Consistency with energy-related regulations would be required to be demonstrated to obtain necessary building permits. Through compliance with existing energy regulations, the Project would be consistent with CN Goal 4 of the City's General Plan Community Resources Element, which encourages energy conservation through Title 24 compliance and energy efficient building design and appliance installation. The Project also supports Measures EE:C4 and EE:D1 of the City's Climate Action Plan, which are to upgrade older commercial buildings and require new buildings to achieve or exceed Title 24 standards.

As discussed previously, the Project would comply with the 2019 CALGreen standards and the Title 24 Building Energy Efficiency Standards.

The Proposed Project would follow applicable energy standards and regulations during construction. In addition, the Proposed Project would be built and operated in accordance with all existing, applicable regulations at the time of construction. Therefore, the Project would not result in a wasteful, inefficient, or unnecessary consumption of natural gas; would decrease electricity and fossil fuel use; and would not conflict with a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

2.4.7 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:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☒	☐	☐
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?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Impact Analysis

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

No Impact. According to the City's General Plan, no active faults have been identified within the City. According to the Community Safety Element – Public Safety Plan, the closest faults in the

broader project region include the regional San Andreas and San Jacinto faults and the local Newport-Inglewood, Palos Verdes, Whittier-Elsinore, Sierra Madre-Cucamonga, San Fernando and Raymond Hill fault system (City of Gardena 2022). The Newport-Inglewood-Rose Canyon Fault Zone is the closest fault and is located approximately 1.5 miles northeast of the Project Site. The faults do not entirely underlie the City; the faults do not underlie the Project Site. Thus, although the Project could experience strong seismic ground shaking (see Section 2.4.7(a)(ii)), the Project Site is not susceptible to surface rupture. Therefore, the possibility of significant fault rupture on the site is considered to be low. Therefore, there is no potential for the rupture of a known earthquake fault at the Project Site.

ii. Strong seismic ground shaking?

Less Than Significant Impact. Similar to other areas located in the seismically active Southern California region, the City is susceptible to ground shaking during an earthquake. Numerous faults considered active or potentially active have been mapped in Southern California, including in the vicinity of the City. However, as addressed in Section 2.4.7(a)(i), the Project is not located within an active fault zone, and the site would not be affected by ground shaking more than any other area in the seismically active region. The Geotechnical Report, which is included as Appendix I, concluded that there was no evidence of faulting during the geotechnical investigation. Therefore, the possibility of significant fault rupture on the site is considered low. Additionally, the Proposed Project is required to be constructed in compliance with the 2019 California Building Code (effective January 1, 2020), which contains standards for building design to minimize the impacts from ground shaking. Therefore, impacts from strong ground shaking would be considered less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load supporting capability when subjected to intense shaking. Any buildings or structures on these sediments may float, sink, or tilt as if on a body of water. According to Figure PS-2: Seismic Hazard Areas in the City's Community Safety Element – Public Safety Plan, the southern region of City is located in a liquefaction zone. The liquefaction risk is no greater for the Project Site than it is for the surrounding areas and cities. Additionally, the Project would be designed in accordance with all applicable provisions established in the current California Building Code, which sets forth specific engineering requirements to ensure structural integrity, regardless of the specific geotechnical characteristics of a particular site. The Geotechnical Report also indicated that based on the conditions encountered at the boring locations, and mapping performed by CGS, liquefaction is not considered to be a significant design concern for the Proposed Project. Therefore, impacts associated with liquefaction would be less than significant.

iv. Landslides?

No Impact. Susceptibility of slopes to landslides and other forms of slope failure depend on several factors, which are usually present in combination—steep slopes, condition of rock and soil materials, presence of water, formational contacts, geologic shear zones, and seismic activity. According to the City's Community Safety Element – Public Safety Plan, the City does not have any known landslide zones (City of Gardena 2022). The Project Site and surrounding area are predominantly flat and lack any substantial topographical variations. No hillsides are located on or adjacent to the Project Site. Therefore, no impacts associated with landslides would occur.

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

Less Than Significant Impact. According to the Geotechnical Report, the Project Site and surrounding area are relatively flat and underlain primarily by artificial fill and alluvial soils. The fill soils generally consist of medium stiff to stiff silty clays with occasional loose fine sandy silts with varying medium to coarse sands. The alluvium generally consists of medium dense silty sands and clayey sands, and stiff to very stiff silty clays and sandy clays with occasional very stiff clayey silts and medium dense to dense sands.

Construction Impacts

The Project would involve earthwork and other construction activities that would disturb surface soils and temporarily leave exposed soil on the ground's surface. Common causes of soil erosion from construction sites include stormwater, wind, and soil being tracked off site by vehicles. However, construction activities are short-term in nature and would comply with all applicable state and local regulations for erosion control and grading. The Proposed Project would be required to comply with standard regulations, including SCAQMD Rules 402 and 403, which would reduce construction erosion impacts. Rule 403 requires that fugitive dust be controlled with best available control measures so that it does not remain visible in the atmosphere beyond the property line of the emissions source (SCAQMD 2005). Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off site (SCAQMD 1976). The Proposed Project would also incorporate Best Management Practices (BMPs), as shown in Appendix H, Low Impact Development Plan, to ensure that potential water quality impacts from water-driven erosion during construction would be reduced to less than significant.

Operational Impacts

Once operational, the Project Site would be developed with a new 190,860-square foot tilt-up concrete industrial building and associated parking and landscaping. Collectively, these on-site areas would reduce the potential for soil erosion and topsoil loss. The structural and paved improvements would be impervious areas lacking any exposed soils. Therefore, impacts associated with soil erosion and topsoil loss would be less than significant.

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

Less Than Significant Impact with Mitigation. See responses to Section 2.4.7(a)(iii) for liquefaction and (iv) for landslide impacts. Lateral spreading refers to lateral displacement of large, surficial blocks of soil as a result of pore pressure buildup or liquefaction in a subsurface layer. According to the City's Community Safety Element – Public Safety Plan, the City is comprised primarily of alluvial soil, containing sand, silt, and clay silts (City of Gardena 2022). The Project Site soil is classified as Urban land-Aquic Xerorthents, fine substratum-Cropley complex, which is described as discontinuous human-transported material over mixed alluvium derived from granite and/or sedimentary rock (USDA 2019).

As addressed in Section 2.4.7(a)(iii), the southern region of the City has been identified as being located in a liquefaction hazard zone. However, the liquefaction risk is no greater for the Project Site than it is for the surrounding areas and cities. As previously discussed, the Proposed Project would be designed in accordance with all applicable provisions established in the current California Building Code, which sets forth specific engineering requirements to ensure structural integrity, regardless of the specific geotechnical characteristics of a particular site. Additionally, the City has relatively flat topography and is not known to have any landslide zones. In accordance with the California Building Code, Appendix J, which has been adopted by the City of Gardena, a geotechnical report has been prepared for the Project. The Geotechnical Report also includes specific recommendations based on the results of the subsurface evaluation and laboratory testing, review of referenced geologic materials, and geotechnical analysis. These recommendations address earthwork, seismic design parameters, foundations, lateral earth pressures, underground utilities, sidewalk and hardscapes, preliminary pavement design, corrosivity, concrete placement, and drainage, among other factors. Therefore, impacts would be less than significant.

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

Less Than Significant Impact with Mitigation. As described in the City's Community Safety Element – Public Safety Plan, the City is comprised primarily of alluvial soil, containing sand, silt, and clay silts (City of Gardena 2022). The U.S. Department of Agriculture's Web Soil Survey does not identify the Project Site or surrounding areas as clay soils, which are typically expansive. The Project Site is classified as Urban land-Aquic Xerorthents, fine substratum-Cropley complex, which is described as discontinuous human-transported material over mixed alluvium derived from granite and/or sedimentary rock (USDA 2021). The Proposed Project would involve excavation of existing soil and import of materials. The imported soil materials would meet the California Building Code standards and would be required to have an expansion index of 20 or less. Such imported materials are anticipated to contain sufficient fines (binder material) to result in a stable

subgrade when compacted, and are required to be approved by the geotechnical engineer of record before being transported to the Project Site. The near-surface soils at this Project Site range from silty clays, sandy clays, clayey sands, and silty sands with occasional sandy silts. Laboratory testing performed on a representative sample of the near-surface soils indicates that these materials possess a medium expansion potential (EI = 51). Based on the presence of expansive soils at this site, care should be given to proper moisture conditioning of all building pad subgrade soils to a moisture content of 2 to 4 percent above the ASTM D-1557 optimum during site grading. The Geotechnical Report also includes specific recommendations based on the results of the subsurface evaluation and laboratory testing, review of referenced geologic materials, and geotechnical analysis. These recommendations address earthwork, seismic design parameters, foundations, lateral earth pressures, underground utilities, sidewalk and hardscapes, preliminary pavement design, corrosivity, concrete placement, and drainage, among other factors Therefore, the Proposed Project would not be on expansive soil, and substantial risks to life or property due to expansive geologic unit would be less than significant.

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

No Impact. Development of the Proposed Project would not require the installation of a septic tank or alternative wastewater disposal system. The Project would use the existing local sewer system. Therefore, no impact would result from septic tanks or other on-site wastewater disposal systems.

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

Less Than Significant Impact with Mitigation. The Project Site has been previously disturbed. Further, according to the U.S. Department of Agriculture's Web Soil Survey, the Project Site is underlain by Urban land-Aquic Xerorthents, fine substratum-Cropley complex, which is described as discontinuous human-transported material over mixed alluvium derived from granite and/or sedimentary rock (USDA 2021). Human-transported fill materials generally do not contain significant paleontological resources on or very near the surface immediately underlying the Project Site. Therefore, the likelihood of affecting paleontological resources within the Project Site is considered low. Nonetheless, it is always possible that intact paleontological resources are present at subsurface depths that were not impacted by previous grading activities. For instance, at depths below human-transported fill materials, there is a greater likelihood of encountering sediments that are old enough to contain significant paleontological resources. Given these factors, the likelihood of impacting paleontological resources within the Project Site is considered low above the original ground surface, increasing with depth. Nonetheless, paleontological resources may possibly exist at deep levels and could be unearthed with implementation of the Project.

Mitigation Measure GEO-2 would require Worker Awareness and Environmental Program (WEAP) Training for construction personnel involved in ground disturbing activities. Mitigation Measure 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 the find to be halted and a professional vertebrate paleontologist be contacted to evaluate the find. With implementation of the Conditions of Approval, a less than significant impact would occur.

Mitigation Measures

Mitigation Measure GEO-1: Prior to issuance of a grading permit, grading plans shall be prepared in conformance with the grading recommendations included in the Geotechnical Report prepared for the proposed project (see Appendix I).

Mitigation Measure GEO-2: 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.

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

2.4.8 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?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Impact Analysis

Regulatory Setting

Federal

The U.S. Environmental Protection Agency is responsible for implementing federal policy to address global climate change. In 2009, the U.S. Environmental Protection Agency issued a Final Rule for mandatory reporting of GHG emissions, which applies to fossil fuel and industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles, and requires annual reporting of emissions. This rule does not regulate the emission of GHGs; it only requires the monitoring and reporting of GHGs for those sources above certain thresholds.

State

California has enacted a variety of legislation relating to climate change, much of which has set aggressive goals for GHG emissions reductions throughout the state. California Executive Order S-03-05 (2005) establishes the goal of reducing GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. In September 2006, Governor Schwarzenegger signed California's Global Warming Solutions Act of 2006 (AB 32), requiring the California Air Resources Board to establish a statewide GHG emissions cap for 2020 based on 1990 emissions and to adopt mandatory reporting rules for significant sources of GHG emissions. In April 2015, Governor Brown signed Executive Order B-30-15, which established the goal of reducing GHG emissions to 40 percent below 1990 levels by 2030.

Regional

The City is in the South Coast Air Basin, and the South Coast Air Quality Management District (SCAQMD) is the agency primarily responsible for comprehensive air pollution control in the basin. To provide GHG emissions guidance to the local jurisdictions in the South Coast Air Basin, the SCAQMD organized a working group to develop GHG emissions analysis guidance and thresholds. In 2008, the SCAQMD's governing board adopted a tiered interim approach for

determining GHG emissions significance, whereby the level of detail and refinement needed to determine significance increases with a project's total GHG emissions. The approach defines projects that are exempt under the California Environmental Quality Act (CEQA) (Tier 1) and projects that are in a GHG Reduction Plan (Tier 2) as less than significant. Tier 3 provides numerical GHG significance threshold of 3,000 $MTCO_2e$ per year for all land use types (SCAQMD 2008).

Local

In 2017, the City, in cooperation the South Bay Cities Council of Governments, prepared a Climate Action Plan (CAP), which includes the goal to reduce GHG emissions to 15 percent below 2005 levels by the year 2020 and the longer-term GHG reduction goal of 49 percent below 2005 levels by 2035. The interim and longer-term goals put the City on a path toward the state's long-term goal to reduce emissions 80 percent below 1990 levels by 2050. The CAP outlines the City's existing sustainability efforts, including improved bicycle infrastructure and partnerships to increase energy efficiency. The CAP included additional measures to reduce GHG emissions to accomplish the City's GHG reduction targets in five broad categories: Land Use and Transportation, Energy Efficiency, Energy Generation, Solid Waste, and Urban Greening (City of Gardena 2017).

Methodology

SCAQMD Thresholds

In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SoCAB. A Proposed Project would be evaluated against the following tiers and a determination would be made as to which tier would be most appropriate for the individual project:

- **Tier 1** consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA. If the project qualifies for an exemption, no further action is required. The project is not exempt from CEQA; therefore, Tier 1 does not apply.
- **Tier 2** consists of determining whether or not the project is consistent with a GHG Reduction Plan that may be part of a local government plan. The GHG Reduction Plan must, at a minimum, comply with AB 32 GHG reduction goals, include an emissions inventory agreed upon by either CARB or the SCAQMD, have been analyzed under CEQA and have a certified final CEQA document, and have monitoring and enforcement components. If the Proposed Project is consistent with the qualifying GHG reduction plan, it is not significant for GHG emissions. The City does not have a qualified CAP, therefore, Tier 2 does not apply.
- **Tier 3** includes a screening level threshold of 3,000 $MTCO_2e$ per year that is intended to achieve a regional emissions capture rate of 90 percent. That is, most future projects

would be required to implement GHG reduction measures while excluding small projects that would contribute a relatively small fraction of the cumulative statewide GHG emissions. Consistent with the SCAQMD method, construction emissions should be amortized over a 30-year project life and added to operational emissions. The following analysis uses Tier 3. The project would result in a significant GHG emissions impact if annual project operation and amortized construction emissions would exceed the screening level threshold of 3,000 $MTCO_2e$.

Modeling Methodology

Construction

Project construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2020.4.0, based on construction information provided by the City and model default assumptions. Project construction is anticipated to last for 12 to 14 months, which is consistent with the CalEEMod default schedule assumptions for the project. A total of 230,889 square feet of existing development on the project site would be demolished and hauled away. Cut and fill would be balanced on site, and no import or export is assumed. Detailed assumptions and modeling datasheets are provided in Appendix C, GHG Memo.

Operation

Operational emissions from existing land uses and the project are modeled with CalEEMod to estimate the net change in emissions as a result of project implementation. Vehicle trip data was obtained from the project's Transportation Impact Analysis (Gibson 2022) (see Appendix A). Modeling assumptions were provided for both the assumption as a manufacturing facility as well as the assumption of a warehouse use.

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

Less Than Significant Impact. Global climate change refers to changes in average climatic conditions on Earth, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHGs in the atmosphere. The GHGs defined under California's Assembly Bill 32 include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).

Single projects do not generate enough GHG emissions on their own to influence global climate change; therefore, the GHG impact analysis measures the project's contribution to the cumulative environmental impact. Implementation of the project would contribute to global climate change directly through GHG emissions from construction through vehicle engine exhaust from construction equipment, on-road truck trips, and worker commuting trips. Operational sources of

GHG emissions include energy use (electricity and natural gas), area sources (landscaping equipment), vehicle use, solid waste generation, and water conveyance and treatment.

The Project includes the development of a new 190,860-square foot tilt-up concrete creative industrial building. Modeling conservatively assumes that the project would be developed as a manufacturing facility, which would result in a reduction of 178 daily trips compared to existing conditions (see Appendix A). If the project operates as a warehousing use, it is anticipated to result in a reduction of 728 daily trips compared to existing conditions. If the Project is developed as a high-cube distribution center, it is anticipated to result in a reduction of 784 daily trips.

Construction

Total GHG emissions associated with construction of the Project would be approximately 709 $MTCO_2e$. Consistent with SCAQMD guidance, construction emissions are amortized over a 30-year project lifetime and added to project operational emissions. Amortized construction emissions would be approximately 24 $MTCO_2e$ per year.

Operation

The existing total operational emissions is 2,456 $MTCO_2e$, whereas the total Project operational emissions for the Proposed Project is 2,212 MTCO2e. In addition, construction would contribute minimal emissions when amortized over 30 years. Since the Proposed Project would result in the reduction of GHG emissions from daily trips, the Project would not exceed the 3,000 $MTCO_2e$ threshold. Therefore, impacts would be less than significant.

Implementation of the Proposed Project would not result in a significant impact related to GHG emissions.

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

Less Than Significant Impact. There are numerous State plans, policies and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. Therefore, the Proposed Project does not conflict with those plans and regulations.

As mentioned, the City has adopted a CAP; however, the CAP is a planning tool with optional GHG reduction strategies and is not a qualified CAP for use for CEQA streamlining. In the absence of a City-specific threshold, guidance from the SCAQMD is used to evaluate the significance of

project emissions. SCAQMD guidance consists of a tiered approach for evaluating GHG emissions for development projects where the SCAQMD is not the lead agency. The project is not exempt from CEQA, and a local qualified CAP is not adopted; therefore, Tiers 1 and 2 of the SCAQMD approach do not apply to the project. Tier 3 establishes a numerical screening level threshold of 3,000 $MTCO_2e$ per year for all land use types. Projects that do not exceed the bright-line threshold would result in a less than cumulatively considerable impact on GHG emissions. This threshold is based on the AB 32 GHG reduction target and 2020 GHG emissions inventory. The SCAQMD has yet to publish a quantified GHG efficiency threshold for the 2030 target. Although the SCAQMD has not published a quantified threshold beyond 2020, this assessment uses the scaled threshold of 2,520 $MTCO_2e$ per year, which was calculated for the buildout year of 2024 based on the GHG reduction goals of Senate Bill 32 and Executive Order B-30-15. As shown in Table 12, Project Greenhouse Gas Emissions, below, operational emissions for the Proposed Project would be 2,212 $MTCO_2e$ which is below the threshold of 2,520 $MTCO_2e$.

Table 12. Project Greenhouse Gas Emissions

Emissions Source	Annual GHG Emissions (MTCO2e)
Existing Conditions	
Area sources	<1
Energy sources	534
Vehicular sources	1,593
Solid waste	131
Water	197
Existing Total Operational Emissions	**2,456**
Proposed Project	
Area sources	<1
Energy sources	508
Vehicular sources	1,399
Solid waste	117
Water	163
Amortized construction	24
Total Project Operational Emissions	**2,212**
Net Change from Project	***(244)***
Significance Threshold	**2,520**
Significant Impact?	*No*

As discussed above, the Proposed Project is an energy-efficient project that would result in insignificant GHG emissions, and would comply with all applicable requirements to further minimize GHG emissions. The Proposed Project would not conflict with applicable plans or regional measures to meet statewide GHG emissions reduction goals. Therefore, impacts would be less than significant.

2.4.9 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?	☐	☐	☒	☐
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?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
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?	☐	☒	☐	☐
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, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Impact Analysis

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

Less Than Significant Impact. Construction of the Proposed Project would likely involve the use of some hazardous materials, such as vehicle fuels, solvents, paints, oils, and grease. Operation of the Proposed Project would involve an unquantifiable, but limited, use of potentially hazardous materials typical of industrial uses, including cleaning fluids, detergents, solvents, adhesives, sealers, paints, fuels/lubricants, and fertilizers and/or pesticides for landscaping. The use, storage, transport, and disposal of hazardous materials by construction workers and tenants of the Proposed Project would be required to comply with existing regulations of several agencies, including the California Department of Toxic Substances Control, U.S. Environmental Protection Agency,

Occupational Safety and Health Administration, California Department of Transportation, and City codes. Impacts would be less than significant.

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

Less Than Significant With Mitigation. The term "hazardous material" can be defined in different ways. For purposes of this environmental document, the definition of "hazardous material" is the one outlined in the California Health and Safety Code, Section 25501:

> Hazardous materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

"Hazardous waste" is a subset of hazardous materials, and the definition is essentially the same as in the California Health and Safety Code, Section 25117, and in the California Code of Regulations, Title 22, Section 66261.2:

> Hazardous wastes are those that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Hazardous materials can be categorized as hazardous nonradioactive chemical materials, radioactive materials, and biohazardous materials (infectious agents such as microorganisms, bacteria, molds, parasites, viruses, and medical waste).

> Exposure of the public or the environment to hazardous materials could occur through the following: improper handling or use of hazardous materials or hazardous wastes, particularly by untrained personnel; transportation accident; environmentally unsound disposal methods; and/or 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.

Following is a discussion of the Proposed Project's potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during the construction and operational phases.

In July 2021, Ardent Environmental Group, Inc. completed a Phase I Environmental Assessment (Phase I ESA) (see Appendix F) of the Project Site. As part of its real estate due diligence, the Project Applicant retained Ardent to prepare a Phase I Environmental Site Assessment (ESA) and Document Review for the site (referred to as the "2021 Phase I ESA"; Ardent, 2021). The 2021 Phase I ESA identified a number of recognized environmental conditions (RECs). Some of these RECs needed further evaluation to assess the extent of impacted soil that will be encountered during redevelopment. A Phase II Environmental Site Assessment (see Appendix G) was conducted and presents the results of this further investigation. The Phase II ESA also documents the results of a site-specific HHRA completed using previous soil gas data collected by others. The HHRA was prepared to determine whether a possible vapor intrusion issue was present in the existing buildings that will remain. Also, an Environmental Summary was completed which is also included in Appendix G.

The Phase II ESA was completed in August, 2021. Based on the 2021 Phase I ESA and a review of these previous investigations, Ardent identified four areas needing further evaluation to determine if soil remediation was needed (REC No. 3) and to further assess the extent of impacted soils (REC Nos. 4, 5, and 6). The following presents the results of the Phase I and II ESAs.

- **REC No. 3: Area 6 –** Former Acetone UST - Based on the data collected in the vicinity of REC No. 3, the residual concentrations of VOCs, namely PCE and TCE, in soil and soil gas would not pose a threat to future workers or occupants of the site and would not threaten groundwater. Therefore, this area would no longer be considered an REC and no further work is necessary.
- **REC No. 4: Area 14b –** Adjacent East of "Not HITCO Property" - Based on the data collected in the vicinity of REC No. 4, the vertical and lateral extent of PCE impacted soil has not been fully defined and may encroach onto the adjacent property to the west. Further onsite investigations and potential onsite remediation are needed. Since this release was first identified during the 2001 FS, the remediation of these soils would be the responsibility of BP.
- **REC No. 5: Area 14c –** Adjacent East of "Not HITCO Property" - Based on the data obtained in the vicinity of REC No. 5, the depth of PCE-impacted soil exceeding the regulatory screening levels for the protection of groundwater is limited to less than 10 feet bgs. During Ardent's investigation, the assessment of the lateral extent of impacted soils was limited due to site access constraints (e.g., fenced areas, outbuilding, concrete cut representing possible utilities, and a warehouse building). Based on the data obtained, the lateral extent of impacted soil is anticipated to be approximately 28 feet

wide by 42 feet long. The total volume of bank (i.e., in-place) impacted soils that will need to be remediated during redevelopment is estimated at approximately 436 cubic yards. Since this release was first identified during the 2001 FS, the remediation of these soils would be the responsibility of BP.

- **REC No. 6: Boring 16 –** Based on the data collected during this investigation, the depth of PCE/TCE-impacted soil exceeding the regulatory screening levels for the protection of groundwater is limited to less than 10 feet bgs in the vicinity of REC No. 6. During Ardent's investigation, the assessment of the lateral extent of impacted soils to the west of boring B16 was limited due to the close proximity of the existing warehouse building. Based on the data obtained, the lateral extent of impacted soil is anticipated to be approximately 47 feet wide by 63 feet long. The total volume of bank (i.e., in-place) impacted soils that will need to be remediated during redevelopment is estimated at approximately 1,097 cubic yards.

  To further evaluate whether a possible vapor intrusion issue was present in the southern portion of the site associated with Building 25 which is planned to continue to be used for commercial purposes, Ardent completed an HHRA using previous soil gas data. Based on the results of this site specific HHRA, which was completed in accordance with current regulatory guidelines, it was determined that a possible vapor intrusion issue was present.

The Phase II ESA presented a number of recommendations based on the investigation conducted.

- **REC No. 4 –** Further investigations should be completed on-site to determine the vertical and lateral extent of impacted soils that will need to be remediated for the protection of groundwater. Shallow soils that will be encountered during site redevelopment should be excavated and removed to the depth of the proposed geotechnical requirements. Any deep impacted soils could be further remediated by in-situ SVE following redevelopment.
- **REC No. 5 and REC No. 6 –** Shallow VOC-impacted soils should be remediated to concentrations below the SFRWQCB-ESL guidelines for the protection of groundwater by excavation and off-site disposal during redevelopment activities.
- Indoor air samples should be collected in Building 25 to assess whether a vapor intrusion issue is present and whether soil vapor mitigation measures are needed to protect future occupants of this building.
- All work should be completed under the direction and approval of the LARWQCB.

Implementation of the recommendations set forth in the Phase II ESA would result in a less than significant impact as well as the implementation of Mitigation Measure HAZ-1 under the oversight and approval of LARWQCB, the Proposed Project would not create a significant hazard to the public or the environment.

Project Construction

Construction activities of the Proposed Project would involve the use of small amounts of hazardous materials, such as cleaning fluids, detergents, solvents, adhesives, sealers, paints, fuels/lubricants, and fertilizers and/or pesticides for landscaping. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature, and construction workers would be trained in safe handling and hazardous materials use. Additionally, the use, storage, transport, and disposal of construction-related hazardous materials and waste would be required to conform to existing laws and regulations of the federal, state, and local agencies. Compliance with applicable laws and regulations would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Therefore, hazards to the public or the environment arising from the routine use of hazardous materials during project construction would be less than significant and no mitigation measures are necessary.

Project Operation

The project involves construction of a new 190,860-square foot tilt-up concrete creative industrial building. As such, potentially hazardous materials associated with operation of the Project would include those materials typically associated with operation of the Project, such as cleaning and maintenance activities. Although these materials would vary, they would generally include industrial cleaning products, solvents, paints, fertilizers, and herbicides and pesticides. Many of these materials are considered industrial hazardous wastes, common wastes, and universal wastes by the EPA, which considers these types of wastes common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported, used, and disposed of (EPA 2021). Federal, state, and local regulations typically allow these types of wastes to be handled and disposed of under less-stringent standards than other hazardous wastes, and many of these wastes do not need to be managed as hazardous waste.

In addition, any potentially hazardous materials handled on the Project Site would be limited in quantity and concentration, consistent with other similar service sector uses located in the City, and any handling, transport, use, and disposal of such material would comply with applicable federal, state, and local agencies and regulations. In addition, as mandated by OSHA, all hazardous materials stored on the Project Site would be accompanied by a Materials Safety Data Sheet, which would inform on-site personnel and residents of the necessary remediation procedures in the case of accidental release (OSHA 2012). Therefore, operational impacts associated with the use, transport, and disposal of hazardous materials would be less than significant.

Mitigation Measures

Mitigation Measure HAZ-1: Prior to the issuance of building permits, the Project Applicant shall prepare and implement a Remedial Action Plan (RAP). Prior to implementation, the RAP shall be reviewed and approved by the LARWQCB. The RAP will present the results of the previous work and present a scope of work to remediate shallow impacted soil that might be encountered during grading and redevelopment activities. The Project Applicant shall provide a copy of the RAP to the City once it has been reviewed and approved by the LARWQCB with confirmation of approval.

At a minimum, the RAP should present the scope of work and schedule to excavate and remove onsite VOC-impacted soil associated with REC Nos. 4, 5, and 6 so grading and redevelopment can commence. The results of the remedial efforts shall be documented in a report that will be submitted to the LARWQCB.

Prior to issuance of grading permits, a Soil Management Plan (SMP) shall be submitted to the City which shall identify the procedures to manage unknown environmental concerns that might be encountered during redevelopment. This document shall also be submitted to the LARWQCB. The SMP does not need to be approved by the LARWQCB nor the City.

A Vapor Intrusion Mitigation System (VIMS) Design Plan shall be prepared that presents the proposed design and construction details of the vapor mitigation system and submitted to the City along with construction documents. A VIMS Performance Plan should accompany the VIMS Design Plan and will present baseline indoor air sampling details that will be collected once the building is constructed. The baseline sampling will provide evidence that the VIMS is performing adequately and that no human health risks are present for site occupancy. The VIMS Performance Plan will include the baseline and startup sampling procedures, on-going performance monitoring, and operation, monitoring, and maintenance (OM&M) operations. The VIMS Performance Plan will also provide contingencies for further mitigation if unfavorable vapor concentrations are discovered. Following completion of these tasks, the Project Applicant will request no further sampling/monitoring be required from the LARWQCB.

Prior to issuance of a temporary or final Certificate of Occupancy, a Land Use Covenant (LUC) shall be recorded with the Los Angeles County Registrar-Recorder restricting the property to be used only for industrial/commercial uses. Proof or recording shall be provided to the City. Prior to recording, the LUC shall be presented to the LARWQCB for review and approval.

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

Less Than Significant Impact. The Project Site is not located within 0.25 miles of existing schools. The Project Site is located approximately 0.85 miles west of 135th Street Elementary School, approximately 0.83 miles east of Purchee Avenue Elementary School, and approximately 0.73 miles

east of Maria Regina School. Project operations would involve industrial use activities and it is possible that hazardous materials could be used by a future occupant's daily operations; however, future operations at the Project site would be required to comply with all applicable local, State, and federal regulations related to the transport, handling, and usage of hazardous materials. During project construction, potentially hazardous materials would likely be handled on the Project Site. Handling of these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the Project. Any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including the USEPA, the California Department of Toxic Substances Control, the California OSHA, Caltrans, the Resource Conservation and Recovery Act, the SCAQMD, and the Los Angeles County Certified Unified Program Agency. Therefore, impacts associated with the emitting or handling of hazardous materials within 0.25 miles of a school would be less than significant.

d. Would the project 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. California Government Code, Section 65962.5, requires the compiling of lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated.

A review of Cortese List online data resources identifies the following sites that are active within the vicinity of 1600 West 135th Street (SWRCB 2021):

- Aerodynamic Plating Co., Inc. #3: 13629 Saint Andrews Place (Plant #3)
- Angelus Plating Works: 1713 West 134th Street
- AVCORP Composite Fabrication Inc.: 1600 W. 135th Street
- KB Gardena Building, LLC: 13720 South Western Avenue

All of these sites except for the AVCORP Composite Fabrication Inc. are over 500 feet away from the Proposed Project Site and would not have a significant impact to the site. The larger HITCO property was listed on regulatory databases and is an active remediation site for VOCs in soil and groundwater. These activities are on-going by the responsible party and are located off the subject property. As described above, on-site VOC-impacted soil was historically identified and remediated under the direction of the LARWQCB. Residual contaminants in the shallow soil that is planned to be disturbed during grading will be further remediated by excavation and off-site disposal (see Mitigation Measures HAZ-1). Groundwater beneath the site is still impacted with VOCs due to historical land use. Based on residual contaminants in soil and/or groundwater, a vapor intrusion issue is possible. As noted above, this possible human health risk will be mitigated

by installing a VIMS beneath the proposed building. With the implementation of the Mitigation Measure HAZ-1 described above, the Proposed Project would not create a significant hazard to the public or the environment. Therefore, impacts associated with a hazardous materials site would be less than significant with mitigation.

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

No Impact. The Proposed Project is not located within the airport land use plans for these nearby airports (ALUC 2021). The Project Site is located outside of any airport impact zones, and as such, the Project would not result in a safety hazard for people working at the Project Site. The Project Site is located approximately 1.7 miles southeast of Hawthorne Municipal Airport (HHR), approximately 3.7 miles northwest of Compton/Woodley Airport, and approximately 4.9 miles southeast of Los Angeles International Airport (LAX). Additionally, the City of Hawthorne General Plan Noise Element provides noise contours for Hawthorne which show that the noise contours associated with the airport do not extend beyond the municipal boundaries of the City of Hawthorne. Therefore, no impacts associated with a safety hazard or excessive noise resulting from proximity to an airport would occur.

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

Less Than Significant Impact. As mentioned in the City's General Plan, the Project would be required to comply with the Gardena Emergency Operations Plan, adopted in 2017. The plan provides a strategy for the City's planned response to emergency situations. The City's Community Safety Element – Public Safety Plan shows emergency routes for the City (City of Gardena 2022). The Project would be provided emergency access along West 135th Street and South Western Avenue. The Project Site is also provided regional access via I-110, I-105, and I-405, as well as SR-91 and SR-107. Due to the Proposed Project's local and regional connectivity, in the unlikely event of an emergency, the project-adjacent roadway facilities would be expected to serve as emergency evacuation routes for first responders and residents. The Project would not adversely affect operations on the local or regional circulation system, and as such, would not influence the use of these facilities as emergency response routes. Therefore, impacts associated with an emergency response plan would be less than significant.

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

No Impact. According to the California Department of Forestry and Fire Protection's (CAL FIRE's) Fire Hazard Severity Zone Map of the County (2020), the Proposed Projects is not located in a Very High Fire Hazard Safety Zone; therefore, the implementation of the Proposed Project would not expose people or structures to a significant risk from wildland fires.

2.4.10 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 groundwater quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. Construction of the Project would include earthwork activities that could potentially result in erosion and sedimentation, which could subsequently degrade downstream receiving waters and violate water quality standards. Stormwater runoff during the construction phase may contain silt and debris, resulting in a short-term increase in the sediment load of the municipal storm drain system. Substances such as oils, fuels, paints, and solvents may be inadvertently spilled on the Project Site and subsequently conveyed via stormwater to nearby drainages, watersheds, and groundwater. Construction-related erosion effects would be addressed through compliance with the NPDES program's Construction General Permit. Construction activity subject to this General Permit includes any construction or demolition activity, including,

but not limited to, clearing, grading, grubbing, or excavation, or any other activity that results in a land disturbance of equal to or greater than 1.0 acre. The Project would disturb approximately 8.76 acres and therefore would be subject to the General Permit. To obtain coverage under the General Permit, dischargers are required to file with the State Water Resources Control Board (SWRCB) the Permit Registration Documents (PRDs), which include a Notice of Intent (NOI) and other compliance-related documents. The General Permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion control and sediment-control Best Management Practices (BMPs) that would meet or exceed measures required by the General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. Also, the Project Site is expected to balance in terms of its construction activities since the approximate earthwork numbers are 20,749 cubic yards of cut, 20,749 cubic yards of fill and 17,721 cubic yards of over-excavation. Therefore, construction impacts associated with water quality standards would be less than significant.

Once operational, the Project Site would be developed with a new 190,860-square foot tilt-up concrete creative industrial building and associated parking and landscaping. Collectively, these on-site areas would reduce the potential for soils erosion and topsoil loss that could affect surface water quality. Additionally, the Proposed Project includes the construction of low impact development (LID) stormwater management systems. Infiltration is not an option at this site so the site will use two (2) interconnected WetlandMod units (at-grade with plants) and two (2) sets of StormTech MC-3500 detention chambers sized to treat 1.5x the StormWater Quality Design Volume. The structural and paved improvements would cover impervious areas lacking any exposed soils. Therefore, operational impacts associated with water quality standards would be less than significant.

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

Less Than Significant Impact. The Project will require the use of water for dust suppression during project demolition, grading, and construction. The amount of water that will be required to control dust during grading and construction will be minimal and not significantly impact existing groundwater supplies. Once completed, the Project will require potable water to serve the Project site, water the landscaping and provide required fire flow. The City and the Project Site would receive water service from the Golden State Water Company – Southwest Water System. According to the Golden State Water Company, the Southwest Water 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) (Golden State Water Company 2022).

Additionally, Golden State Water Company (GSWC) has entitlement of groundwater resources in the West and Central Coast Groundwater Basins. Furthermore, GSWC leases additional water rights from entities that no longer pump groundwater but have entitlements, in the attempt to meet the increase in water demand from its service area. As such, GSWC currently has no immediate concern with the availability of water supply to the City. Therefore, impacts associated with groundwater supplies would be less than significant.

The Project involves the construction of a new 190,860-square foot tilt-up concrete creative industrial building and associated parking and landscaping. The Project Site would introduce more pervious areas via landscaping in the front yard and along the perimeters of the Project Site.

Under the existing conditions, the Project Site is occupied by a silica and carbon-based products manufacturing company; therefore, the Project Site is not considered an important location for groundwater recharge. The Project would not substantially impair groundwater recharge necessary to replenish the City's water supply; thus, impacts related to groundwater recharge would be less than significant.

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

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

Less Than Significant Impact. There are no streams or rivers located on or near the Project Site. Project construction would involve some earth-disturbing activities, including grading, that could expose on-site soils to erosion and surface water runoff. However, the Project Site is located within a developed area, with primarily industrial land uses surrounding the Project Site; as such, the development of the Project would not cause a significant change to surface bodies of water in a manner that could cause siltation or erosion. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. There are no natural drainage features on or near the Project Site. The Project Site, in its existing condition, is occupied by a silica and carbon-based products manufacturing company. Construction activities would entail grading, excavation, and other ground-disturbing activities, which could temporarily alter surface drainage patterns and increase the potential for flooding, erosion, or siltation. However, the Project would comply with existing local, state, and federal regulations related to drainage and runoff. As such, the Project would not result in flooding on or off site. According to the Low Impact Development Plan (see Appendix H), the Proposed Project within the south property is a redevelopment Project disturbing less than 50 percent of the impervious surface and the previous development project was not subject to post-construction stormwater quality control measures, Therefore, only the proposed disturbed areas

must meet the requirements of the Los Angeles County's Low Impact Development Standards Manual (February 2014). The Proposed Project will disconnect runoff from impervious areas by means of biofiltration systems and underground detention. Additionally, the Project is designed so that pollutants from the impervious surfaces are disconnected prior to discharging offsite. Runoff from the parking lots is conveyed to the biofiltration units for treatment. Additionally, the Project would be required to comply with the NPDES Construction General Permit, which would require implementation of BMPs and erosion control measures, thereby reducing the effects of construction activities on erosion and drainage patterns. The Proposed Project will not substantially increase the rate or amount of surface runoff in a manner, which would result in a flooding on or off-site.

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

Less Than Significant Impact. The Proposed Project would comply with existing local, state, and federal regulations related to drainage and runoff. Furthermore, according to the Low Impact Development Plan (see Appendix H), runoff from the northerly portion of the roof and northerly vehicle parking will drain to catch basins in the drive aisle. A private storm drain will convey the storm water westerly then southerly around the west side of the building. Catch basins in the drive aisle will collect runoff and tie into the storm drain. The storm drain will continue southerly then turn easterly into the truck yard. Three catch basins will collect runoff from the southerly portion of the building roof, truck yard, and easterly drive aisle.

The storm drain will then wrap back around the westerly site of the building and flow north towards 135th Street. The private drain will connect to the existing 8'6" x3' box. The south property drains to the existing public storm drain in 139th Street. A catch basin in the proposed truck yard will collect the runoff and a storm drain will convey runoff southerly through the drive aisle towards 139th Street. The southern building adjacent to 139th Street will be left as-is. Therefore, impacts associated with stormwater drainage system capacity would be less than significant.

iv. Impede or redirect flood flows?

Less Than Significant Impact. The Proposed Project Site does not contain any streams or rivers having the potential to be altered by the Project. The Project Site has been previously graded and is located within a highly urbanized area. According to Figure Ps-3: FEMA Flood Zone Map in the City's Community Safety Element – Public Safety Plan, the majority of the City is located outside a Federal Management Agency 500-year floodplain, which indicates that the City has less than a 0.9% probability of flooding annually (City of Gardena 2022). Therefore, no impacts associated with impeding or redirecting flood flows would occur.

d. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. Tsunamis are seismic sea waves generated by sudden movements of the sea floor caused by submarine earthquakes, landslides, or volcanic activity. Seiches are waves that oscillate in enclosed water bodies, such as reservoirs, lakes, ponds, or semi-enclosed bodies of water. Seiches may be triggered by moderate or large submarine earthquakes or by large onshore earthquakes. No significant impacts from an earthquake-induced seiche would occur. Mud and debris flows are mass movements of dirt and debris that occur after intense rainfall, earthquakes, and severe wildfires. The speed of a slide depends on the amount of precipitation and steepness of the slope.

Flooding from tsunami conditions is not expected since the Project Site is located approximately 6.9 miles from the Pacific Ocean. In addition, the National Flood Insurance Program identifies the City as a Zone A area, meaning that the City has a 1 percent annual chance of flooding (i.e., a portion of the City is within the 100-year flood zone). The Project would comply with existing local, state, and federal regulations related to drainage and runoff. Runoff from public streets would be collected into existing curb inlet catch basins and gutters along West 135th Street and 139th Street. Therefore, the Project would not result in flooding on or off site. The Project would not risk release of pollutants due to inundation and a less than significant impact would occur.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Project Site is located within the jurisdiction of the Los Angeles Regional Water Quality Control Board Basin Plan (RWQCB 2014). Construction activities would comply with applicable requirements of the Los Angeles Regional Water Quality Control Board, including compliance with Stormwater Pollution Prevent Plan-mandated BMPs. Compliance with regional and local regulations related to water quality control plans would reduce potential water quality impairment of surface waters. Therefore, the Proposed Project would not conflict with a water quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

2.4.11 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Impact Analysis

a. Would the project physically divide an established community?

Less Than Significant Impact. The Project Site is currently occupied by a silica and carbon-based products manufacturing company. The project is surrounded primarily by industrial uses. The Project Site does not physically divide any community, and redevelopment of the Project Site would not physically divide an established community. The Proposed Project would entail the development of new 190,860-square foot tilt-up concrete creative industrial building. Therefore, a less than significant impact would occur.

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

Less Than Significant Impact. The Project Site is currently designated as General Industrial by the City of Gardena General Plan and is classified as General Industrial (M-2) zone. The Proposed Project is concurrently applying for a conditional use permit (CUP) for warehousing/distribution. If the applicant were to receive approval for the CUP, then the Project would be consistent with the General Plan and Zoning Ordinance. Additionally, the proposed industrial uses would be consistent with the existing industrial uses located in all directions of the Project Site. Thus, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant.

2.4.12 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

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

No Impact. The Project Site is not a locally important mineral resource recovery site according to maps obtained through the California Department of Conservation and California Geological Survey. The Project Site is located within a Mineral Resource Zone 1 (MRZ-1) zone, which is defined as an area where adequate information indicates that no significant mineral deposits are present (DOC 1981). No known mineral resources of value to the region are located in the Project Site; therefore, no impact would occur.

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

No Impact. The Project Site is not a locally important mineral resource recovery site according to maps obtained through the California Department of Conservation and California Geological Survey. The Project Site is located within a Mineral Resource Zone 1 (MRZ-1) zone, which is defined as an area where adequate information indicates that no significant mineral deposits are present (DOC 1981). The implementation of the Proposed Project would not result in the loss of availability of a locally important mineral resource; therefore, no impact would occur.

2.4.13 Noise

Would the project result in:	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?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Impact Analysis

a. Would the project result in 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 California Department of Transportation defines "noise" as sound that is loud, unpleasant, unexpected, or undesired. Sound pressure levels are quantified using a logarithmic ratio of actual sound pressures to a reference pressure squared, called "bels." A bel is typically divided into tenths, or decibels (dB). Sound pressure alone is not a reliable indicator of loudness because frequency (or pitch) also affects how receptors respond to sound. To account for the pitch of sounds and the corresponding sensitivity of human hearing to them, the raw sound pressure level is adjusted with a frequency-dependent A-weighting scale that is stated in units of decibels (dBA) (Caltrans 2013).

A receptor's response to a given noise may vary depending on the sound level, duration of exposure, character of the noise sources, time of day during which the noise is experienced, and activity affected by the noise. Activities most affected by noise include rest, relaxation, recreation, study, and communications. In consideration of these factors, different measures of noise exposure have been developed to quantify the extent of the effects from a variety of noise levels. The community noise equivalent level (CNEL) is the average equivalent A-weighted sound level over a 24-hour period. This measurement applies weights to noise levels during evening and nighttime hours to compensate for the increased disturbance response of people at those times. CNEL is the equivalent sound level for a 24-hour period with a +five dBA weighting applied to sound occurring

between 7 p.m. and 10 p.m. and a +10 dBA weighting applied to sound occurring between 10 p.m. and 7 a.m. (City of Garden 2006a).

The dB level of a sound decreases (or attenuates) as the distance from the source of that sound increases. For a single point source, such as a piece of mechanical equipment, the sound level typically decreases by approximately six dBA for each doubling of distance from the source. Sound that originates from a linear (or "line") source, such as vehicular traffic, attenuates by approximately three dBA per doubling of distance. Other contributing factors that affect sound reception include ground absorption, natural topography that provides a natural barrier, meteorological conditions, and the presence of human-made obstacles, such as buildings and sound barriers (Caltrans 2013).

Noise-sensitive land uses include noise receptors (receivers) where an excessive amount of noise interferes with normal activities. The Project Site is located in a primarily industrial area. Industrial uses are not generally considered noise sensitive. However, some residences are located between industrial buildings. The closest residences are located at the intersection of West 135th Street and Halldale Avenue, approximately 350 feet northeast of the Project Site, and near the intersection of West 135th Street and Normandie Drive, approximately 800 feet west of the site.

The most significant noise-producing activity within the City includes vehicle noise from arterials and train movements on the Union Pacific rail line. In addition, numerous fixed sources of noise exist within portions of the City including noise from commercial and industrial operations (City of Gardena 2006a).

City of Gardena General Plan

Applicable policies and standards governing environmental noise in the City are set forth in the General Plan Community Safety Element - Noise Plan (2006). Table N-1 of the Gardena Noise Plan outlines the exterior noise compatibility for community noise environments, replicated below in Table 13, Noise Plan Community Noise Exposure Levels (dBA CNEL). A land use in an area identified as "normally acceptable" indicates that standard construction methods attenuate exterior noise to an acceptable indoor noise level and that people could conduct outdoor activities with minimal noise interference. Land uses that fall into the "conditionally acceptable" noise environment need noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, usually suffice. For land uses where the exterior noise level falls within the "normally unacceptable" range, new construction or development should generally be discouraged. If new construction or development proceeds, a detailed analysis of noise reduction requirements must be made with noise insulation features included in the design. For land uses where the exterior noise levels fall within the "clearly unacceptable" range, new construction generally should not be undertaken. The Noise Plan includes three goals and associated policies including using noise control to reduce transportation

noise impacts (N Goal 1), incorporating noise considerations into land use planning decisions (N Goal 2), and developing measures to control non-transportation noise impacts (N Goal 3).

Table 13. Noise Plan Community Noise Exposure Levels (dBA CNEL)

Land Use Category	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – single-family, multi-family, duplex,	50–60	60–65	65–75	75–85
Residential – mobile homes	50–60	60–65	65–75	75–85
Transient lodging, motels, hotels	50–60	60–70	70–80	80–85
Schools, libraries, churches, hospitals, nursing homes	50–60	60–65	65–75	75–85
Auditoriums, concert halls, amphitheaters, meeting halls	NA	50–60	60–70	NA
Sports arenas, outdoor spectator sports, amusement parks	50—65	65–75	NA	75—85
Playgrounds, neighborhood parks	50–65	65-70	70 –75	75—85
Golf courses, riding stables, cemeteries	50–70	70—75	75–85	NA
Office and professional buildings	50–65	65 – 75	75–80	80 – 85
Commercial retail, banks, restaurants, theatres	50 – 70	70 – 80	80 – 85	NA
Industrial, manufacturing, utilities, wholesale, service stations	50–70	70–85	NA	NA
Agriculture	50 – 85	NA	NA	NA

Source: City of Gardena 2006a.

Notes: CNEL = community noise equivalent level; dBA = A-weighted decibel; NA = not applicable (Appendix E, Noise Memo).

City of Gardena Municipal Code – Noise Ordinance

Sections 8.36.040 and 8.36.050 of the City's Noise Ordinance establish exterior and interior noise standards as it relates to how loud operational noise can be. The allowable noise levels are presented in Table 14, Allowable Exterior and Interior Noise Levels. Subsection 8.36.040(C) states that in the event the ambient noise level exceeds the noise standard, the ambient noise level shall become the noise standard.

Table 14. Allowable Exterior and Interior Noise Levels

Type of Land Use	15-minute Average Noise (dBA, Leq)		Maximum Noise Level (dBA, Lmax)	
	7:00 a.m. – 10:00 p.m.	10:00 p.m. – 7:00 a.m.	7:00 a.m. – 10:00 p.m.	10:00 p.m. – 7:00 a.m.
Residential	55	50	75	70
Residential portions of mixed use	60	50	80	70
Commercial	65	60	85	80
Industrial or manufacturing	70	70	90	90
Allowable Interior Noise Levels				
Residential	45	40	65	60
Residential portions of mixed use	45	40	70	60

Source: City of Gardena 2006b.

Notes: CNEL = community noise equivalent level; dBA = A-weighted decibel; Leq = equivalent continuous sound level

Noise levels are measured at the property line of the noise-sensitive land use.

[1] This category includes residences, hospitals, and hotels where a nighttime sensitivity to noise is assumed to be of utmost importance.

[2] This category includes schools, libraries, theaters, and churches where it is important to avoid interference with activities such as speech, meditation, and concentration on reading material. (Appendix E, Noise Memo).

Per Section 8.36.080 of the City's Noise Ordinance, project construction activities are explicitly exempt from the exterior and interior noise standards presented in Sections 8.36.040 and 8.36.050. Specifically, the ordinance states that "noise associated with construction, repair, remodeling, grading or demolition of any real property are exempt from the provisions in Chapter 8.36 (City of Gardena Noise Ordinance), provided said activities do not take place between the hours of 6:00 PM and 7:00 AM on weekdays between the hours of 6:00 PM and 9:00 AM on Saturday or any time on Sunday or a Federal holiday."

Construction Impact Analysis

Construction of the Project would have the potential to result in temporary noise level increases as a result of operation of heavy equipment and haul trucks. Construction of the Project would generate noise that could expose nearby receptors to elevated noise levels that may disrupt communication and routine activities. The magnitude of the impact would depend on the type of construction activity, equipment, duration of the construction phase, distance between the noise source and receiver, and intervening structures. Sound levels from typical construction equipment range from 76 dBA to 88 dBA Leq at 50 feet from the source (FTA 2018). Noise from construction equipment generally exhibits point source acoustic characteristics. Strictly speaking, a point source sound decays at a rate of six dBA per doubling of distance from the source. The rule applies to the propagation of sound waves with no ground interaction.

Project construction would last for approximately 12 to 14 months and would require typical construction equipment. Therefore, construction would generate noise levels ranging from 76 to 88 dBA L_{eq} at 50 feet from construction activities. The Project Site is surrounded by industrial

buildings that are not considered noise sensitive. Additionally, construction would take place during the allowable hours outlined in Section 8.36.080 of the City's Noise Ordinance: 7:00 AM to 6:00 PM and weekdays and 9:00 AM to 6:00 PM on Saturdays. Truck trips would be required for hauling material during demolition and delivery of construction materials; however, the site is currently a source of truck trips. Therefore, temporary impacts from construction would be less than significant.

Permanent Increase in Vehicle Noise

The Proposed Project would generate vehicle trips during operation, including personal vehicle trips from employees and truck trips from deliveries. However, the Project Site is currently developed with facilities that general vehicle and truck trips. Based on the Project's Transportation Impact Analysis (Gibson 2022), the Project is anticipated to result in a net decrease in vehicle trips compared to existing conditions. The Project would generate approximately 178 fewer daily trips than the current use if it would be developed with manufacturing uses. If the Project operates as a warehousing use, it is anticipated to result in a reduction of 728 daily trips compared to existing conditions. If the Project is developed as a high-cube distribution center, it is anticipated to result in a reduction of 784 daily trips. It is anticipated that the Project would have a similar trip distribution as the existing facilities and utilize similar truck routes. Therefore, the Project would be expected to result in similar or reduced ambient vehicle noise compared to existing conditions. Therefore, potential noise impacts are considered less than significant.

Other Operational Noise Sources

Operation of the Project would be expected to result in stationary noise from heating, ventilation, and air conditioning (HVAC) systems and industrial equipment. The specifications of future HVAC systems and industrial equipment are currently unknown. However, the nearest sensitive receptors are located approximately 350 feet from the Project Site. At this distance, typical noise levels from major mechanical HVAC equipment (69–73 dBA CNEL) at a distance of 50 feet, would be reduced to below the noise compatibility standard of 60 dBA CNEL for sensitive receptors. Industrial equipment would be subject to Noise Ordinance standards as well as Occupational Safety and Health Administration requirements to protect workers from hearing loss.

In addition to HVAC systems, the proposed land uses also have the potential to generate noise from truck deliveries and parking areas. Truck delivery noise sources include engines idling and beeping from back up warning signals at commercial loading docks. State law (13 CCR 2485) currently prohibits heavy-duty diesel delivery trucks from idling more than five minutes. Therefore, noise from idling will be limited to five minutes during truck deliveries. Beeping from trucks would not be continuous and would only occur while the truck is backing up. Noise sources from parking areas include car alarms, door slams, radios, and tire squeals. These sources are

generally short term and intermittent, and would be different from each other in kind, duration, and location so that the overall effects would be separate.

Additionally, the noise sources associated with the Project, including stationary equipment, truck deliveries, and parking areas would be similar to the operation of the existing industrial uses on the Project Site. The site is surrounded by industrial development that is not considered noise sensitive and therefore would not be sensitive to minor changes in industrial noise on the Project Site. Operational impacts from the Project would be less than significant.

b. Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Excessive groundborne vibration is typically associated with activities such as blasting used in mining operations, or the use of pile drivers during construction. The primary concern associated with ground-borne vibration is annoyance; however, in extreme cases, vibration can cause damage to buildings, particularly those that are old or otherwise fragile. Some common sources of ground-borne vibration are trains, and construction activities such as blasting, pile-driving, and heavy earth-moving equipment. The Proposed Project would be constructed using typical construction techniques and would be short-term in nature. No pile driving for construction would be necessary. Thus, significant vibration impacts would not occur. Heavy construction equipment (e.g., bulldozer and excavator) would generate a limited amount of ground-borne vibration during construction activities at short distances away from the source. The use of equipment would most likely be limited to a few hours spread over several days during demolition/grading activities. Post-construction on-site activities would be limited to mechanical equipment (e.g., air handling unit and exhaust fans) that would not generate excessive ground-borne vibration or ground-borne noise. Therefore, ground-borne vibration and noise levels associated with the Proposed Project would be less than significant.

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

No Impact. The Proposed Project is not located within the airport land use plans for the nearby airports (ALUC 2021). Thus, the Project would not expose people residing or working in the Project area to excessive noise levels. The Project Site is located approximately 1.7 miles southeast of Hawthorne Municipal Airport (HHR), approximately 3.7 miles northwest of Compton/Woodley Airport, and approximately 4.9 miles southeast of Los Angeles International Airport (LAX). Therefore, no impacts associated with a safety hazard or excessive noise resulting from proximity to an airport would occur.

2.4.14 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)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Impact Analysis

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

Less that Significant Impact. The CEQA Guidelines identify several ways in which a project could have growth-inducing impacts (Public Resources Code, Section 15126.2), either directly or indirectly. Growth-inducement may be the result of fostering economic growth, fostering population growth, providing new housing, or removing barriers to growth. Growth inducement may be detrimental, beneficial, or of no impact or significance under CEQA. An impact is only deemed to occur when it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be shown that the growth will significantly affect the environment in some other way.

The Proposed Project consists of industrial uses and would not result in a significant population increase in the area. The Project is consistent with the most recent uses of the site (industrial uses). It is also consistent with the zoning and land use designations as light industrial for the Project Site. 1600 West 135th Street would house a new 190,860-square foot tilt-up concrete industrial building designed to accommodate up to two tenants with a variety of uses, including e-commerce, manufacturing, and warehousing/distribution. The employees that would fill the roles anticipated for the Proposed Project would come from the region and therefore not induce unplanned population growth in the area.

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

No Impact. The Project Site is currently occupied by a silica and carbon-based products manufacturing company. No housing units would be demolished as part of the construction of the new industrial building at 1600 West 135th Street. Therefore, the Proposed Project would not displace a substantial number of existing people, necessitating the construction of replacement housing elsewhere.

2.4.15 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:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Impact Analysis

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:

Fire protection?

Less Than Significant Impact. Fire protection and emergency medical response services in the City are provided by the Los Angeles County Fire Department (LACFD). The LACFD provides service to over 58 cities and unincorporated areas throughout the County. The Project Site is served by Fire Station No. 159: 2030 West 135th Street, which is located approximately 0.59 mile west of the site. The station is equipped with one fire truck and four personnel, including a fire captain, an engineer, and a firefighter (City of Gardena 2022).

The Project Site is already within the LACFD service area, and once operational, would continue to be served by LACFD. Additionally, as discussed in Section 2.4.14(a), Population and Housing, the Project would not induce substantial population growth in the City. The Proposed Project would not result in the construction of new or physically altered fire facilities. Service to the Project site by LACFD occurs under existing conditions. The continuation of industrial uses within the Project site would not incrementally increase the demand for fire protection or emergency medical services to the site. Overall, it is anticipated that the Project would be adequately served by existing LACFD facilities, equipment, and personnel. Therefore, impacts would be less than significant.

Police protection?

Less Than Significant Impact. Police protection services in the City are provided by the Gardena Police Department (PD) (City of Gardena 2022). The PD operates out of the Civic Center: 1718 West 162nd Street, which is located roughly 1.7 miles south of the Project Site.

The Project Site is already within the PD service area, and once operational, the Project would continue to be served by the PD. As previously mentioned, the Project would not induce substantial population growth in the City. The continuation of industrial uses to the Project site would not incrementally increase the demand for police protection services to the site. Overall, it is anticipated that the Project would be adequately served by existing PD facilities, equipment, and personnel. Therefore, impacts would be less than significant.

Schools?

Less Than Significant Impact. Education in the City is provided by the Los Angeles Unified School District (LAUSD). As previously mentioned, the Proposed Project would not induce substantial population growth in the City. As such, a significant increase in school-age children requiring public education is not expected to occur, and there would be no need for the development of additional schools. Therefore, the Proposed Project would result in less-than-significant impacts associated with the construction or expansion of school facilities.

Parks?

Less Than Significant Impact. As previously mentioned, the Proposed Project would not induce substantial population growth in the City. As such, an increase in patronage at park facilities is not expected. In addition, the number of residents visiting existing parks would be minimal. Therefore, the Proposed Project would result in less-than-significant impacts associated with the construction or expansion of park facilities.

Other public facilities?

Less Than Significant Impact. As previously mentioned, the Proposed Project would not induce substantial population growth in the City. As such, a substantial increase in patronage at libraries, community centers, and other public facilities is not expected. Therefore, the Proposed Project would result in less-than-significant impacts associated with the construction or expansion of public facilities.

2.4.16 Recreation

	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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Impact Analysis

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. As discussed in Section 2.4.14(a), the Proposed Project would not induce substantial population growth in the City. As such, the Proposed Project would not increase the use of existing parks and recreational facilities such that substantial physical deterioration of recreational facilities would occur or be accelerated. Additionally, due to the anticipated limited number of construction personnel, short-term impacts to local recreational facilities would not occur. Therefore, substantial physical deterioration of these facilities would not occur or be accelerated with implementation of the Proposed Project, and the Project would result in less-than-significant impacts.

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. The Proposed Project would not induce substantial population growth in the City. Thus, the Project would not increase the demand for recreational facilities. Additionally, the Project would not promote or indirectly induce new development that would require the construction or expansion of recreational facilities. Therefore, impacts would be less than significant.

2.4.17 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?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☒	☐

Impact Analysis

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

Less Than Significant Impact. GTrans and LA Metro currently serve the Project Site and the surrounding area. GTrans Line 2 serves the Project Site. GTrans Line 2 circles Western, Imperial Highway, Vermont, Normandie and PCH, taking riders to several important places in the community. The closest stop to the Project Site is located at 13999 S Western Ave, Gardena, CA 90249 approximately 0.6 miles away from the Project Site.

LA Metro Route 209 operates between the Cities of Los Angeles, Inglewood, and West Athens, traveling through the City of Gardena along Normandie Avenue, to the west of the Project site. Typically, Route 209 operates on weekdays from approximately 5:40 AM to 8:02 PM, with 15- to 25-minute headways. The nearest stop to the Project site is located at Crenshaw Boulevard and 135th Street, approximately 1.3 miles from the Project site. The Project would continue to be served by the existing transit system. The employees that would fill the roles anticipated for the Proposed Project would come from the region and therefore not induce unplanned population growth in the area that would substantially increase the demand for public transit services. The Proposed Project would not conflict with a program plan, ordinance, or policy addressing transit and impacts would be less than significant.

Western Avenue and 135th Street provide access to the Project site. According to the Gardena General Plan, Western Avenue is an arterial roadway. Arterial roadways are the principal urban thoroughfares, provide a linkage between activity centers in the City to adjacent communities and other parts of the region, and prove intra-city mobility. The Project does not propose any changes to Western Avenue.

There are no bicycle facilities adjacent to the Project site. In December, 2011 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. There are no bicycle facilities proposed adjacent to the Project site. The Project would not conflict with a program plan, ordinance, or policy addressing bicycle facilities and impacts would be less than significant.

A sidewalk is located adjacent to the Project site along W. 135th Street. The Proposed Project would not remove existing sidewalks or significantly impact pedestrian access or facilities. The Project would not conflict with a program, plan, ordinance or policy addressing pedestrian facilities and impacts would be less than significant.

The Proposed Project will not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, a less than significant impact would occur.

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

Less Than Significant Impact. The following analysis was based on the Transportation Screening Analysis: Transportation Assessment for the 1600 West 135th Street Project prepared by Gibson Transportation Consulting, Inc. (Appendix A). Based on review of the ITE land use descriptions, Land Use Code(s) 140 Manufacturing and 710 General Office Building were determined to adequately represent the proposed use and were selected for the analysis. The number of trips forecast to be generated by the Proposed Project is determined by multiplying the trip generation rates and directional distributions by the land use quantity.

As shown in Table 15, Project Trip Generation, the proposed use is forecast to generate approximately 967 daily trips, including the trips generated for both land uses: Manufacturing and General Office Building.

Table 15. Project Trip Generation

Trip Generation Rates									
			AM Peak Hour			PM Peak Hour			Daily
Land Use	Source[1]	Size[2]	% In	% Out	Rate	% In	% Out	Rate	Rate
Manufacturing	ITE 140	per ksf	76%	24%	0.68	31%	69%	0.74	4.75
General Office Building	ITE 710	per ksf	88%	12%	1.52	17%	83%	1.44	10.84
Trips Generated									
			AM Peak Hour			PM Peak Hour			Daily
Land Use	Source[1]	Size[2]	In	Out	Total	In	Out	Total	Trips
Manufacturing	ITE 140	180.86 ksf	93	30	123	42	92	134	859
General Office Building	ITE 710	10 ksf	13	2	15	2	12	14	108

[1] **Sources:** ITE = Institute of Transportation Engineers Trip Generation Manual (11th Edition, 2021); ### = Land Use Code

[2] ksf = 1,000 square feet

State of California Senate Bill 743 (Steinberg, 2013) (SB 743) required the Governor's Office of Planning and Research to change the CEQA guidelines regarding the analysis of transportation impacts. Under SB 743, the focus of transportation analysis shifted from driver delay (level of service [LOS]) to VMT in order to reduce greenhouse gas emissions, create multimodal networks, and promote mixed-use developments.

The City Guidelines define the methodology for analyzing a project's VMT impacts in accordance with SB 743 and include criteria for screening low VMT generating projects out of a detailed VMT analysis. The City Guidelines include an outline of the procedures for studying a project's effects on the local transportation system beyond what is required to comply with CEQA under SB 743. For projects generating less than 20 peak hour trips, a summary of a project's trip generation and assignment is required, and no cumulative project review or LOS analysis is necessary.

The Project is anticipated to generate 178 fewer daily trips, 21 fewer morning peak hour trips and 18 fewer afternoon peak hour trips than those currently generated by on-site uses. Based on these results, adjacent intersections and roadway segments are anticipated to experience less traffic demand and/or congestion from the Proposed Project uses.

After accounting for the removal of existing uses on site, the Project would result in net negative trip generation. Based on the City Guidelines, the Project satisfies the Project Type Screening criteria by generating fewer than 110 daily trips. As such, the Project would be screened from performing a detailed VMT analysis, and it can be concluded that the Project would result in a less-than-significant VMT impact. Further, the local transportation assessment includes a geometric distribution assignment and demonstrates the Project would result in lessened traffic

demand and/or congestion at adjacent intersections and along roadway segments due to the reduction in overall traffic.

Therefore, the Proposed Project satisfies the City-established screening criteria for non-retail project trip generation screening and may be presumed to result in a less than significant VMT impact.

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

No Impact. The Proposed Project consists of constructing a new 190,860-square foot tilt-up concrete creative industrial building. Vehicular access to the site would be provided by two 45-feet wide driveways on West 135th Street. The Proposed Project would not include unusual or hazardous design features, nor would it generate incompatible uses with the surrounding industrial area. The access point has been designed consistently with the City's circulation standards and does not create a hazard for vehicles, bicycles, or pedestrians entering or exiting the site. Therefore, the Proposed Project would not substantially increase hazards in/around the site and no impact would occur.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. The Project Site comprises of 8.46-acres in the City. During construction, surrounding roadways would continue to provide emergency access through the Project Site and to surrounding properties. Further, the Project would provide emergency access in accordance with the requirements of the Los Angeles County Fire Department. Therefore, the Proposed Project would not result in inadequate emergency access.

2.4.18 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:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 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.	☐	☒	☐	☐

Impact Analysis

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:

Impact Analysis

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:

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

Less Than Significant Impact with Mitigation. Section 21074 defines tribal cultural resources (TCR) as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that is included or determined eligible for inclusion in the

California Register of Historical Resources or a local register, or that has been determined to be a TCR by the lead agency, in its discretion and supported by substantial evidence.

A significant impact may occur if a project were to cause a substantial adverse change in the significance of a Tribal cultural resource listed or eligible for listing in the California Register of Historical Resources (CRHR), or in a local register of historical resources as defined in California Public Resources Code, Section 5020.1(k).

The Project Site is currently occupied by an aerospace manufacturing company. The Project Site is located in a highly urbanized and developed part of the City, and is completely developed. The City of Gardena (City) initiated tribal outreach efforts for the purposes of AB-52 consultation on June 1, 2022. The Gabrieleño Band of Mission Indians – Kizh Nation requested consultation and the City met with them on June 9, 2022. Although no Native American tribal cultural resources are known to occur within the Project site, based on the Gabrieleño Band of Mission Indians – Kizh Nation's cultural affiliation with the area and the findings of the Cultural Resources Assessment, the parties agreed to impose mitigation measures to mitigate potential impacts to previously unidentified Native American tribal cultural resources.

As such, the Project Site would not be eligible for listing in the National Register of Historic Places or CRHR, and thus, would not be considered a historical resource as defined by CEQA. Mitigation Measure TCR-1 will be implemented, however, to assure that impacts remain less than significant.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 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. No resources have been identified onsite or within the vicinity of the Project Site and surrounding area pursuant to criteria set forth in subdivision (c) of Public Resources Code, Section 5024.1. However, Mitigation Measure TCR-2 and TCR-3 will be implemented to assure impacts remain less than significant. As required by AB 52 (Public Resources Code, Section 21080.3.1 et seq.), the City notified all Native American tribes provided by the California Native American Heritage Commission (NAHC) and on the City's AB 52 tribal consultation list of the Project, inviting the tribes to consult on the Project. The City has received one response from the Gabrieleño Band of Mission Indians – Kizh Nation, who requested the following mitigation measures.

Mitigation Measures

Mitigation Measure TCR-1: Prior to issuance of a grading permit, the applicant shall retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities:

A. The project applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR-2: Prior to issuance of grading permit, the following notes shall be listed on the grading plans for the project:

Unanticipated Discovery of Human Remains and Associated Funerary Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code, Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code, Section 7050.5, dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code, Section 5097.98, shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code, Section 5097.98(d)(1) and (2).

D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Mitigation Measure TCR-3: Prior to issuance of grading permit, the following notes shall be listed on the grading plans for the project:

Procedures for Burials and Funerary Remains

A. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the

Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

2.4.19 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, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, 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. The Proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities for the reasons discussed below.

Water Facilities

The Project involves the construction of a new 190,860-square foot tilt-up concrete creative industrial building, in replacement of existing industrial uses. Therefore, water demand for the Proposed Project would be comparable to existing demand at the Project Site. Additionally, as discussed in Section 2.4.14, Population and Housing, the Proposed Project would not result in a significant population increase for the City as the Proposed Project is not introducing new residential uses. The Proposed Project's nominal contribution to the total water demand could be served by existing water facilities serving the project area without requiring new or expanded facilities. Table 16, Multiple-Dry Years

Supply and Demand Comparison (DWR Table 7-4W), in the Urban Water Management Plan for the West Basin Municipal Water District indicates water supplies would meet the service area's water demands for normal, single-dry, and multiple dry-year conditions through 2045.

Table 16. Multiple-Dry Years Supply and Demand Comparison (DWR Table 7-4W)

		2025	2030	2035	2040	2045
First Year	Supply Totals	146,190	150,160	160,450	165,660	165,760
	Demand Totals	146,190	150,160	160,450	165,660	165,760
	Difference	**0**	**0**	**0**	**0**	**0**
Second Year	Supply Totals	146,190	150,160	160,450	165,660	165,760
	Demand Totals	146,190	150,160	160,450	165,660	165,760
	Difference	**0**	**0**	**0**	**0**	**0**
Third Year	Supply Totals	146,190	150,160	160,450	165,660	165,760
	Demand Totals	146,190	150,160	160,450	165,660	165,760
	Difference	**0**	**0**	**0**	**0**	**0**
Fourth Year	Supply Totals	146,190	150,160	160,450	165,660	165,760
	Demand Totals	146,190	150,160	160,450	165,660	165,760
	Difference	**0**	**0**	**0**	**0**	**0**
Fifth Year	Supply Totals	146,190	150,160	160,450	165,660	165,760
	Demand Totals	146,190	150,160	160,450	165,660	165,760
	Difference	**0**	**0**	**0**	**0**	**0**

Source: West Basin Municipal Water District, 2020 Urban Water Management Plan

Notes: Units are in AFY

The Proposed Project also includes the construction of low impact development (LID) stormwater management systems. LID is an approach to stormwater management that mimics a site's natural hydrology as the landscape is developed. Stormwater is managed on-site and the rate and volume of predevelopment stormwater reaching receiving waters is unchanged. Additionally, according to the City of Gardena's General Plan, industrial uses create 240 gallons per 1,000 square feet. The existing building space proposed for demolition totals 296,630 square feet of industrial uses, using approximately 71,191 gallons per day of water. As the Proposed Project includes the construction of a 190,860 industrial warehouse building, it would consume approximately 45,806 gallons per day of water. This would result in a net reduction of approximately 25,385 gallons per day of water compared to the existing use. The Proposed Project would also comply with the California Green Building Standards Code (CALGreen) which includes requirements for residential and non-residential uses which would further reduce water usage compared to existing use. The non-residential provisions of the 2019 CALGreen Code outline planning, design and development methods that include environmentally responsible site selection, building design, building siting and development to protect, restore and enhance the environmental quality of the site and respect the integrity of adjacent properties; establishes the means of conserving water used indoors, outdoors and in wastewater conveyance; outlines means of achieving material conservation and

resource efficiency; and outlines means of reducing the quantity of air contaminants. Thus, impacts associated with the construction or expansion of water facilities would be less than significant.

Wastewater Treatment Facilities

Wastewater generated at the Project Site would be treated at the Hyperion Water Reclamation Plant (Hyperion), which is owned and operated by Sanitation Districts of Los Angeles County. Hyperion provides primary, secondary, and tertiary treatment for an estimated 275 million gallons per day (Los Angeles County Sanitation Districts (LACSD) 2021). Wastewater generated by the Project would represent only a nominal percentage of the Hyperion average dry-weather flow capacity and average wastewater flow. According to the City of Gardena's General Plan, industrial uses create 200 gallons of wastewater per 1,000 square feet. The existing building space proposed for demolition totals 296,630 square feet of industrial uses, generating approximately 59,326 gallons of wastewater per day. As the Proposed Project includes the construction of a 190,860 industrial warehouse building, it would generate approximately 38,172 gallons of wastewater per day. This would result in a net reduction of approximately 21,154 gallons of wastewater per day compared to existing use. As mentioned above, the Proposed Project would also comply with the California Green Building Standards Code (CALGreen) which would further reduce wastewater when compared to existing use. The non-residential provisions of the 2019 CALGreen Code outline planning, design and development methods including for wastewater conveyance. Thus, the Proposed Project would not require or result in relocation or construction of wastewater facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts associated with wastewater treatment facilities would be less than significant.

Stormwater Drainage Facilities

The Proposed Project is located on level or gently sloping topography and is surrounded by urban land uses. The Project is not anticipated to substantially modify existing topography or runoff patterns. Also, the Proposed Project includes the construction of low impact development (LID) stormwater management systems. LID is an approach to stormwater management that mimics a site's natural hydrology as the landscape is developed. Stormwater is managed on-site and the rate and volume of predevelopment stormwater reaching receiving waters is unchanged. Therefore, impacts associated with stormwater drainage facilities would be less than significant.

Electric Power Facilities

Electrical energy is accessed by transmission and distribution lines from substations owned by SCE. At full buildout, the Project's operational phase would require electricity for building operation (appliances, lighting, etc.). In addition, the project would be required to comply with the 2019 Title 24 standards or the most recent standards at the time of building permit issuance. The energy-using fixtures within the project would likely be newer technologies, using less electrical power. Additionally, as discussed in Section 2.4.6, Energy, previously, the Proposed Project would

result in a net decrease in electricity use totaling 228,339 kWh/yr. Therefore, no new or expanded facilities would be required and impacts associated with electrical power facilities would be less than significant.

Natural Gas Facilities

Natural gas is provided to the City by Southern California Gas Company, Pacific Region. As mentioned in the General Plan, natural gas is imported by the Southern California Gas Company from its interstate system. (City of Gardena 2022). The Project would result in a net increase in natural gas use from 192 MT CO_2e to 206 MT CO_2e, for a net natural gas use of 14 MT CO_2e, as indicated in Table 17, Existing and Project Natural Gas Use, below.

Table 17. Existing and Project Natural Gas Use

Scenario	GHG Emissions (MT CO_2e)	KBTU/yr
Existing	192	3,575,859
Proposed Project	206	3,754,650
Net Natural Gas Use	**14**	**178,791**

The net increase in natural gas would likely be less than demonstrated in Table 4 of the Energy Memo (see Appendix D) because the CalEEMod modeling does not take into account that the Project would be subject to more stringent Title 24 Building Energy Efficiency Standards compared to the existing buildings. Therefore, no new or expanded facilities would be required and impacts related to natural gas would be less than significant.

Telecommunications Facilities

The City of Gardena is served by multiple telecommunications service providers. Since the Project Site is in an urbanized area and is surrounded primarily by industrial uses, there are existing telecommunication facilities that would be able to serve the Project Site. Telecommunication services are provided by a variety of companies and are typically selected by the individual customer. Transmission lines/infrastructure for these services are provided within the Project Site. The Proposed Project would not require or result in the relocation or construction of telecommunication facilities. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The City of Gardena, including the Project Site, receives water from Golden State Water Company (GSWC). This City is located within the 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).

According to the Golden State Water Company, the Southwest Water 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) (Golden State Water Company 2022). Additionally, GSWC has entitlement of groundwater resources in the West and Central Coast Groundwater Basins. GSWC also leases additional water rights from entities that no longer pump groundwater but have entitlements, in the attempt to meet the increase in water demand from its service area. As such, GSWC currently has no immediate concern with the availability of water supply to the City. The City's water demands can be met under multiple-dry years, and because supply would meet projected demand due to diversified supply and conservation measures and because the Proposed Project would not result in a significant increase in population, the project's water demands would be served by the City's projected current and future supplies. Additionally, as previously indicated, according to the City of Gardena's General Plan, industrial uses create 240 gallons per 1,000 square feet. As the Proposed Project includes the construction of a 190,860 industrial warehouse building, it would generate approximately 45,806.4 gallons per day of water. The General Plan provided an estimate of 2,288,736 gallons per day of existing water usage with a projected 2,545,584 gallons per day for year 2025. The estimated 45,806.4 gallons per day for the Proposed Project is within this projected increase.

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

Less Than Significant Impact. A significant impact would occur if the wastewater treatment provider indicates that a project would increase wastewater generation to such a degree that the capacity of the facilities currently serving the Project Site would be exceeded. As mentioned in Section 2.4.19(a), wastewater generated at the Project Site would be treated at the Hyperion Water Reclamation Plant (Hyperion). Hyperion provides primary, secondary, and tertiary treatment for an estimated 275 million gallons per day (LACSD 2021). Wastewater generated by the Project would represent only a nominal percentage of the LBWRP average dry-weather flow capacity and average wastewater flow. As previously mentioned above, the 38,172 gallons per day for the Proposed Project is within this projected increase indicated in the General Plan. Therefore, impacts associated with wastewater treatment capacity would be less than significant.

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

Less Than Significant Impact. Solid waste disposal services for the City are provided by Waste Resources of Gardena (WRG). Waste from the City is taken to either the American Waste Transfer Station, which is operated by Republic Services of California, LLC (1449 West Rosecrans Avenue) or the Waste Resources Recovery Station, which is operated by Waste Resources Recovery, Inc.

(357 West Compton Boulevard). Currently, the City contributes approximately 86,354 tons of waste annually. Approximately 27 percent of waste is recycled through the City's programs. Commercial land uses are the largest producer of disposable waste, generating approximately 35,194 tons of waste and 9,502 tons of recyclable materials annually. Additionally, the Proposed Project will comply with all federal, state, and local statutes and regulations related to solid waste. All construction debris will be disposed of according to applicable federal, state, and local statutes. According to the City of Gardena's General Plan, industrial uses create 8.93 pounds of solid waste per 1,000 square feet. As the Proposed Project includes the construction of a 190,860 industrial warehouse building, it would generate approximately 1,704.38 pounds of solid waste per day. The General Plan provided an estimate of 85,160 pounds per day of existing solid waste for industrial with a projected 84,717 pounds per day for year 2025. The 1,704.38 pounds per day for the Proposed Project is within this projected increase. Therefore, impacts associated with solid waste generation would be less than significant.

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

Less Than Significant Impact. See response to 2.4.19(d) above. Additionally, collection, transportation, and disposal of solid waste generated by the Project would comply with all applicable federal, state, and local statutes and regulations. In particular, AB 939, the Integrated Waste Management Act of 1989, requires that at least 50% of solid waste generated by a jurisdiction be diverted from landfill disposal through source reduction, recycling, or composting. Regional agencies, counties, and cities are required to develop a waste management plan that would achieve a 50% diversion from landfills (California Public Resources Code, Section 40000 et seq.). Therefore, impacts associated with solid waste reduction would be less than significant.

2.4.20 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

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

No Impact. As mentioned in the City's Community Safety Element – Public Safety Plan, the Project would be required to comply with the City's Emergency Operations Plan, adopted in 2017. The plan provides a strategy for the City's planned response to emergency situations. The City's Community Safety Element – Public Safety Plan shows emergency routes for the City (City of Gardena 2022). The Project would be provided emergency access along West 135th Street and South Western Avenue. The Project Site is also provided regional access via I-110, I-105, and I-405, as well as SR-91 and SR-107. Due to the Proposed Project's local and regional connectivity, in the unlikely event of an emergency, the Project -adjacent roadway facilities would be expected to serve as emergency evacuation routes for first responders and residents. The Project would not adversely affect operations on the local or regional circulation system, and as such, would not influence the use of these facilities as emergency response routes. Therefore, there would be no impacts associated with an emergency response plan.

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

No Impact. The Project Site is not on a slope that would expose project occupants to pollutant concentrations from wildfire. Additionally, according to the California Department of Forestry and Fire Protection's (CAL FIRE's) Fire Hazard Severity Zone Map of the County (2020), the Proposed

Projects is not located in a Very High Fire Hazard Safety Zone. Therefore, the development of the Proposed Project would not expose people or structures to a significant risk from wildland fires.

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

No Impact. The Proposed Project does not involve the installation of new infrastructure that would exacerbate fire risk. In addition, the Project Site is not in or immediately near state responsibility areas or lands classified as Very High Hazard Severity Zones according to CAL FIRE's California Fire Hazard Severity Zone Maps (2021). Therefore, the development of the Proposed Project would not result in temporary or ongoing impacts to the environment.

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

No Impact. The Proposed Project is not in an area that is susceptible to flooding or landslides. In addition, the Project Site is not in or immediately near state responsibility areas or lands classified as Very High Hazard Severity Zones according to CAL FIRE's California Fire Hazard Severity Zone Maps (2021). Therefore, the development of the Proposed Project would expose people or structures to significant risks.

2.4.21 Mandatory Findings of Significance

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

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Impact Analysis

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. With implementation of Mitigation Measures TCR-1 through TCR-3, the Proposed 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, 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.

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. As determined in the analysis presented in this IS/MND, with implementation of Mitigation Measures TCR-1 through TCR-3, the Proposed Project would not result in significant impacts in any resources area; therefore, there would be no cumulatively considerable effects.

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

Less Than Significant Impact. As determined in the analysis in this IS/MND, for all resource topics the Project would have no impact or less than significant impacts. Therefore, substantial adverse impacts on human beings would not occur as a result of the Project.

Section 3 List of Preparers

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Section 4 References

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