

CITY OF GARDENA  
GENERAL PLAN, ZONING CODE &  
ZONING MAP AMENDMENT PROJECT  
FINAL ENVIRONMENTAL IMPACT REPORT

*Prepared for:*

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

*Prepared by:*

De Novo Planning Group  
180 E. Main Street, Suite 108  
Tustin, CA 92780

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

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A Land Use Planning, Design, and Environmental Firm







# **CITY OF GARDENA GENERAL PLAN, ZONING CODE & ZONING MAP AMENDMENT PROJECT**

Final Environmental Impact Report

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**LEAD AGENCY: CITY OF GARDENA**

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May 2024





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## 1.0 INTRODUCTION

This Final Environmental Impact Report (Final EIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The City of Gardena is the lead agency for the environmental review of the General Plan, Zoning Code & Zoning Map Amendment Project (Project) and has the principal responsibility for approving the Project. This Final EIR assesses the expected environmental impacts resulting from approval and adoption of the City of Gardena General Plan, Zoning Code & Zoning Map Project and responds to comments received on the Draft EIR.

### 1.1 PROJECT BACKGROUND

As described in the Draft EIR, the Project is a result of the City's recent adoption of the 6<sup>th</sup> Cycle Housing Element for 2021 – 2029 (Housing Element). Housing element law requires local governments to adequately plan to meet their existing and projected housing needs, including their share of the regional housing needs allocation (RHNA) (California Government Code Sections 65580-65588) based on a Regional Housing Needs Plan (RHNP) developed by councils of government. The Southern California Association of Governments (SCAG) determined that the City of Gardena will need to accommodate the development of 5,735 units during the 8-year planning period into four income categories of very low (1,485 units), low (761 units), moderate (894 units), and above moderate (2,595 units).

Government Code Section 65583(a)(3) requires local governments to prepare an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning on these sites to public facilities and services. The inventory of land suitable for residential development shall be used to identify sites that can be developed for housing within the planning period. The Gardena Housing Element contained Inventory Sites that accommodated its RHNA allocation along with an approximate 22 percent buffer for affordable units, as recommended by the Department of Housing and Community Development.

Because the City has limited vacant or underutilized properties within the existing residential and mixed-use zones to accommodate the RHNA number, the Housing Element requires that almost all of the Inventory Sites be provided with one of four housing overlays and that certain amendments be made to the Gardena Land Use Map and Gardena Zoning Code/Zoning map, in part to provide for ministerial approval of affordable projects and also to provide objective zoning standards.

The Housing Element identified 122 sites (468 parcels consolidated) that are considered viable for housing development (the Inventory Sites). Except for two sites which are identified for rezoning to a very high residential density, all the other sites are slated to receive one of four housing overlays. The Housing Element included a program requirement from HCD that the City amend the Land Use Plan and adopt an urgency ordinance by February 15, 2023, implementing



the housing overlay zones, rezoning for the Inventory Sites, and provide that any project with a minimum of 20 percent affordable housing be ministerially approved. The City informed HCD that it was studying additional non-inventory sites to be rezoned (Non-inventory Sites) to create better development patterns and opportunities and was preparing an EIR to study all of the changes. As a result, the program further provided that within one year of the adoption of the urgency ordinance, the City was to complete the rezoning of the overlay zones, which would include a CEQA analysis.

On February 15, 2023, the City Council adopted Resolution No. 6620 updating the Land Use Plan, including changes to the Land Use Map, Urgency Ordinance No. 1847<sup>1</sup> amending the Zoning Code and revising the Zoning Map, and Resolution No. 6621 adopting a color palette for buildings, fences, and walls. The Resolution and Ordinance also rescinded the Artesia Corridor Specific Plan, changed the land use designation for five of the six areas in the Specific Plan, and rezoned all six Specific Plan areas.

This EIR examines the potential environmental impacts associated with the land use and zoning changes, including text amendments, previously made in connection with the Housing Element implementation (as described above), as well as potential environmental impacts associated with the proposed land use and zoning changes to the Non-inventory Sites and additional Zoning Code text amendments, not previously considered. As the City Council will reaffirm its previous actions, for purposes of this EIR and analysis, all actions are described as if they are new. However, it is noted that if the City Council does not approve the entire Project, as defined and analyzed in this EIR, the City Council would need to take an affirmative action to rescind changes to the Land Use Map, Zoning Code, and Zoning Map that were previously approved in February 2023, with the exception of pre-permit and post-permit requirements which will remain in place regardless.

Although the proposed Project does not involve site-specific development, the intent is to provide adequate sites for residential development to accommodate the City's regional housing needs allocation (RHNA) and to allow for additional residential development opportunities should they arise. To allow for new residential development, it is assumed existing on-site uses will be removed and residential development will occur. The assumptions used in the EIR are consistent with the assumptions that were used in the recently adopted 6th Cycle Housing Element and assumes every Inventory Site, as well as the non-inventory sites, will actually be developed with residential uses only; non-residential development would not occur.

Refer to Section 3.0, Project Description, of the Draft EIR for a more comprehensive description of the details of the proposed Project.

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<sup>1</sup> In addition to the Urgency Ordinance, the same changes to the Zoning Code and Zoning map were also made by Ordinance No. 1848 which was introduced on February 15, 2023 and adopted on February 28, 2023.





## 1.2 PURPOSE AND INTENDED USES OF THE EIR

### CEQA REQUIREMENTS FOR A FINAL EIR

This Final EIR for the General Plan, Zoning Code & Zoning Map Amendment Project has been prepared in accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines. State CEQA Guidelines Section 15132 requires that a Final EIR consist of the following:

- the Draft Environmental Impact Report (Draft EIR) or a revision of the draft;
- comments and recommendations received on the Draft EIR, either verbatim or in summary;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- the responses of the lead agency to significant environmental concerns raised in the review and consultation process; and
- any other information added by the lead agency.

In accordance with State CEQA Guidelines Section 15132(a), the Draft EIR is incorporated by reference into this Final EIR.

An EIR must disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed projects, and obligates them to balance a variety of public objectives, including economic, environmental, and social factors.

### PURPOSE AND USE

The City of Gardena, as the lead agency, has prepared this EIR to provide the public and responsible and trustee agencies with an objective analysis of the potential environmental impacts resulting from adoption of the City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project, and subsequent development consistent with the Project. The environmental review process enables interested parties to evaluate the proposed Project in terms of its environmental consequences, to examine and recommend methods to eliminate or reduce potential adverse impacts, and to consider a reasonable range of alternatives to the Project. While CEQA requires that consideration be given to avoiding adverse environmental effects, the lead agency must balance adverse environmental effects against other public objectives, including the economic and social benefits of a project, in determining whether a project should be approved.

This EIR will be used as the primary environmental document to evaluate all subsequent planning and permitting actions associated with the City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project. This EIR may also be used by other agencies within Los Angeles County.



Responsible and trustee agencies that may use the EIR are identified in Section 2.0, Introduction and Purpose, of the Draft EIR.

### 1.3 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR has involved, or will involve, the following general procedural steps:

#### NOTICE OF PREPARATION

The City of Gardena circulated a Notice of Preparation (NOP) of an EIR for the Project on April 13, 2023, to trustee and responsible agencies, the State Clearinghouse, and the public. The City extended the public review period, accepting comments until 4:30 PM on May 19, 2023. An EIR Scoping Meeting was held on April 27, 2023, at 6:00 PM in the City Hall Council Chambers. The City received five comments during the NOP public review period. A summary of the primary environmental issue areas and where in the Draft EIR the issues are addressed, are provided in Table 2-1, Summary of NOP Comments, of the Draft EIR.

#### NOTICE OF AVAILABILITY AND DRAFT EIR

The City of Gardena published a public Notice of Availability (NOA) for the Draft EIR on January 16, 2024, inviting comments from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH# 2023040334) pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review from January 16, 2024, through February 29, 2024.

The Draft EIR contains a description of the Project, description of the environmental setting, identification of the Project's direct and indirect impacts on the environment, and General Plan policies and actions and General Plan EIR mitigation measures to reduce impacts to the extent feasible, as well as an analysis of Project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identifies issues determined to have no impact or a less than significant impact, and provides detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP were considered in preparing the analysis in the Draft EIR.

#### RESPONSE TO COMMENTS/FINAL EIR

The City of Gardena received six (6) comment letters regarding the Draft City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project and Draft EIR from public agencies, organizations, and members of the public during the 45-day review period.

In accordance with CEQA Guidelines Section 15088, this Final EIR responds to the written comments received on the Draft EIR. The comments do not require revisions to the Draft EIR.



## CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

The Gardena City Council will review and consider the Final EIR. If the City Council finds that the Final EIR is "adequate and complete," then it may certify it in accordance with CEQA. The rule of adequacy generally holds that an EIR can be certified if:

- 1) The EIR shows a good faith effort at full disclosure of environmental information; and
- 2) The EIR provides sufficient analysis to allow decisions to be made regarding the proposed project in contemplation of environmental considerations.

Upon review and consideration of the Final EIR, the Gardena City Council may take action to approve, revise, or reject the Project. A decision to approve the City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project, for which this EIR identifies significant environmental effects, must be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093.

## 1.4 ORGANIZATION OF THE FINAL EIR

This Final EIR has been prepared consistent with Section 15132 of the State CEQA Guidelines, which identifies the content requirements for Final EIRs. This Final EIR is organized in the following manner:

### SECTION 1.0 – INTRODUCTION

Section 1.0 briefly describes the purpose of the environmental evaluation, identifies the lead agency, summarizes the process associated with preparation and certification of an EIR, and identifies the content requirements and organization of the Final EIR.

### SECTION 2.0 – COMMENTS ON DRAFT EIR AND RESPONSES

Section 2.0 provides a list of commenters, copies of written comments made on the Draft EIR (coded for reference), and responses to those written comments.

### SECTION 3.0 – MITIGATION MONITORING AND REPORTING PROGRAM

Section 3.0 consists of the Mitigation Monitoring and Reporting Program, which identifies the Final EIR mitigation measures and mechanism by which to monitor the mitigation measures.



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## 2.0 COMMENTS ON DRAFT EIR AND RESPONSES

### 2.1 INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) Guidelines, Section 15088, the City of Gardena, as the lead agency, has evaluated the comments received on the Public Review Draft City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project Environmental Impact Report (Draft EIR) (State Clearinghouse No. 2023040334).

CEQA Guidelines Section 15088.5 states that: *New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.*

Section 2.0 of this Final EIR include information that has been added to the EIR since the close of the public review period in the form of responses to comments and/or errata. As noted below, no new significant information was provided on the Draft EIR during the comment period.

### 2.2 LIST OF COMMENTERS

Table 2-1 lists the comments on the Draft EIR that were submitted to the City during the 45-day public review period. The assigned comment letter, letter author, affiliation, if presented in the comment letter or if representing a public agency, and letter date are also listed.

**Table 2-1  
List of Commenters**

Response Letter	Individual or Signatory	Affiliation	Date
A	Andrew Salas	Gabrieleno Band of Mission Indians – Kizh Nation	1/16/2024
B	Mala Patel	Resident	1/17/2024
C	Danica Nguyen	South Coast Air Quality Management District	1/19/2024
D	Ronald M. Durbin	County of Los Angeles Fire Department	2/1/2024
E	Patricia Horsley	Los Angeles County Sanitation Districts	2/5/2024
F	Frances Duong	Caltrans, District 7	2/27/2024



## 2.3 COMMENTS AND RESPONSES

### REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate and respond to all comments on the Draft EIR that regard an environmental issue. The written response must address the significant environmental issue raised and be detailed, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies only need to respond to significant environmental issues associated with the project and do not need to provide all the information requested by the commenter, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204(a)).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible environmental impacts of the project and ways to avoid or mitigate the significant effects of the project, and that commenters provide evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines Section 15088 also recommends that revisions to the Draft EIR be noted as a revision in the Draft EIR or as a separate section of the Final EIR. Based on the comments received, no changes were necessary to the DEIR.

### RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- a) Each comment letter is lettered (i.e., Letter A), each comment within each letter is numbered (i.e., A-1, A-2, etc.), and each response is numbered correspondingly (i.e., A-1, A-2, etc.).

If changes to the Draft EIR text result from the response to comments, those changes are included in the response and identified with revisions marks (underline for new text, ~~strike out~~ for deleted text). However, as mentioned above, based on the comments received, no changes were necessary to the DEIR.



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION  
Historically known as The San Gabriel Band of Mission Indians recognized by  
the State of California as the aboriginal tribe of the Los Angeles basin

January 16, 2024

Project Name: 1700 West 162<sup>nd</sup> Street Gardena, California 90247

Thank you for your letter dated January 16, 2024. Regarding the project above. This is to concur that we agree with the General Plan Amendment. However, our Tribal government would like to request consultation for all future projects within this location.

A-1

Andrew Salas, Chairman  
Gabrieleno Band of Mission Indians – Kizh Nation

Andrew Salas, Chairman  
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman  
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary  
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

[www.gabrielenoindians@yahoo.com](http://www.gabrielenoindians@yahoo.com)

[gabrielenoindians@yahoo.com](mailto:gabrielenoindians@yahoo.com)



### **Response to Comment Letter A**

Andrew Salas, Chairman  
Gabrieleno Band of Mission Indians – Kizh Nation  
January 16, 2024

- A-1 The comment indicates that the Gabrieleno Band of Mission Indians – Kizh Nation does not have any comments on the Project; however, the Tribal government would like to request consultation for all future projects within the Project Area. Section 5.18, *Tribal Cultural Resources* of the Draft EIR addresses tribal cultural resources. As stated in Section 5.18 of the Draft EIR, the Gardena General Plan includes Policy CN 5.3, which protects and preserves cultural resources of the Gabrielino Native American Tribe found or uncovered during construction. Additionally, Gardena Municipal Code Section 18.42.210, *Post-permit Requirements*, contains protections pertaining to tribal cultural resources. Subsequent development within the Project Area would be required to comply with existing federal, State, and local regulations, including consultation with Tribal Organizations, consistent with State law (i.e., AB 52 and SB 18). The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.



**Mala Patel**  
1224 W 130<sup>th</sup> St,  
Gardena, CA 90247  
Phone: 714-307-9809  
Email: mala.patel3@gmail.com

Date: January 17<sup>th</sup>, 2024

Subject: 1350 W 139<sup>th</sup> St – Letter to City Council – Environmental Impact Report Comment - Re-zoning

Dear City Council Members and Planning Commission Members of the City of Gardena,

I hope this letter finds you well. I want to start off by saying thank you for everything you do to keep our city a safe and attractive place to live and work and your dedication to the betterment of our community. Per the Draft Environmental Impact Report (EIR) for the City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project, the city is currently in the works to re-zone our property located at 1350 W 139<sup>th</sup> St, Gardena from R1/R2 to fully R2. **I am writing to you to respectfully request that you consider re-zoning our property to R3 zoning (Medium Density Multi-Family Residential District), instead.**

My family has been operating our family business here in Gardena for over 40 years. During this time, we have experienced substantial growth and are proud to have created numerous employment opportunities for local residents. We currently employ over 50 employees. Our employees are the heart and soul of our business, and their well-being is of utmost importance to us. As Los Angeles County faces a housing shortage, it has been increasingly difficult to attract and retain talent.

We currently own a home on a large lot on 139<sup>th</sup> St located close to our Office in Gardena and hope to develop it to provide housing for our employees.

I am writing to kindly request that you consider re-zoning our property located at 1350 W 139<sup>th</sup> St, Gardena to R3 zoning (Medium Density Multi-Family Residential District), instead. By re-zoning to R3, we aim to construct around 7-8 townhomes that will cater to the housing needs of the community and provide affordable housing to our dedicated workforce. Our commitment to the community extends beyond business operations. We plan to engage in community service initiatives, promoting a sense of belonging and a shared responsibility to make our neighborhood an even better place to live.

Property Details (see [Article I](#)):

- Address: 1350 W 139<sup>th</sup> St, Gardena, CA 90247
- AIN: 6115013025
- Land Sqft: 19,175 sqft

The reasons behind our compelling request:

1. *California is in a housing shortage.* It is no secret that California is grappling with a severe housing crisis. The shortage of affordable housing has reached alarming levels, and our state desperately needs new homes to accommodate its growing population. **The state of California's Regional Housing Need Assessment is now requiring the City of Gardena to be able to accommodate the development of roughly 5,800 additional units by 2029.** By allowing the property to be re-zoned to an R3 lot, we will construct 7-8 townhomes/units on the lot, contributing to the unit requirement by Regional Housing Need Assessment. We currently have a rough sketch/plan of the 8 townhomes we aim to construct on our property (see [Article II](#)).

B-1



**Mala Patel**  
1224 W 130<sup>th</sup> St,  
Gardena, CA 90247  
Phone: 714-307-9809  
Email: mala.patel3@gmail.com

- a. Over our time in this great city, we have seen access to decent and affordable housing become increasingly difficult to find. As business owner, we understand that access to affordable housing is vital in retaining and attracting talent. We have had some of our best employees leave because of the slim access to affordable housing in the area. By re-zoning our property to R3, we intend to utilize the density bonus to construct affordable housing units that will be of the same size and quality as the surrounding units. These affordable housing units of quality would help attract and retain talent into the city and in turn, bolster diversity in our community and strengthen the city's strong economic base.
2. *Our lot is significantly underutilized, and it is an ideal R3 lot.*
  - a. The lot directly west of our lot, located at 1360 W 139<sup>th</sup> St, is of a similar size to our lot and is an R3 lot with 14 units (see Article III). Because our lots are of a similar size, our lot is not being fully utilized for providing housing to meet the community's housing need.
  - b. The average size of R3 lots in the City is about 0.28 acres; **our lot is roughly 0.44 acres.** Additionally, the minimum R3 lot square footage is 5,000 sqft; **our lot is 19,175 sqft.** Due to the comparable size of our lot to the average R3 zoned lots, it appears that our current lot is being underutilized. Given this, there is potential to maximize our lot's capacity by accommodating more houses. This expansion would address the community's housing needs and contribute significantly to fulfilling necessary housing requirements.
  - c. In this area, there are numerous industrial-zoned properties where thriving businesses operate, providing employment opportunities for a substantial workforce. Many of these employees would want housing, particularly affordable options within the city of Gardena, in close proximity to their workplace. Re-zoning our lot to R3 would all allow utilize our lot and add additional housing, thus addressing this demand for housing in proximity to this industrial zone. See Article III for the industrial-zoned properties in close proximity to our lot.
  - d. There are numerous R3 zoned lots located adjacent to our lot (see Article III for locations). Additionally, the lot directly south of our lot, located at 1452 Azalea Cir, is zoned R4 (see Article III), and Gardens apartment complex, located at 13921 Normandie Ave, is across the street from our property. Given the prevalence of higher density zoning in the vicinity of our lot, it is reasonable to propose a change in zoning for our lot to R3. This adjustment would align with the surrounding area and would allow for the development of much needed housing in this area.
  - e. There are numerous commercial lots located near our lot. The new townhomes we aim to construct by re-zoning our lot to R3 would attract more individuals to the businesses operating in these commercial spaces and thus contribute to bolstering economic growth for the city.
3. *We have proven building experience.* We have successfully built townhomes before in the city of Bellflower, demonstrating our commitment to responsible development and adherence to all necessary regulations. We are dedicated to continuing this tradition of responsible construction. My family loves this city, and we are grateful for the ability to operate our business out of it. We

B-1  
con't

**Mala Patel**  
1224 W 130<sup>th</sup> St,  
Gardena, CA 90247  
Phone: 714-307-9809  
Email: mala.patel3@gmail.com

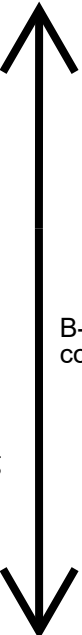
actively support local police and fire department, and we are dedicated to seeing the growth and development of this great city.

We understand that re-zoning decisions must be made thoughtfully, considering the impact on infrastructure, neighborhood aesthetics, and the views of local residents. We are committed to working in partnership with city planners, residents, and other stakeholders to ensure a seamless integration of housing that respects the surrounding community's character.

Re-zoning our property to R3 will not only benefit our company but also the community as a whole by enhancing the overall quality of life for our employees. We believe this step will contribute positively to our city's development, making it a safe and attractive place to live, work, and play

I would like to express my gratitude for your time and attention to this matter. Your support in re-zoning our property would be greatly appreciated and would have lasting positive impact on the broader community.

Thank you,  
Mala Patel



B-1  
con't

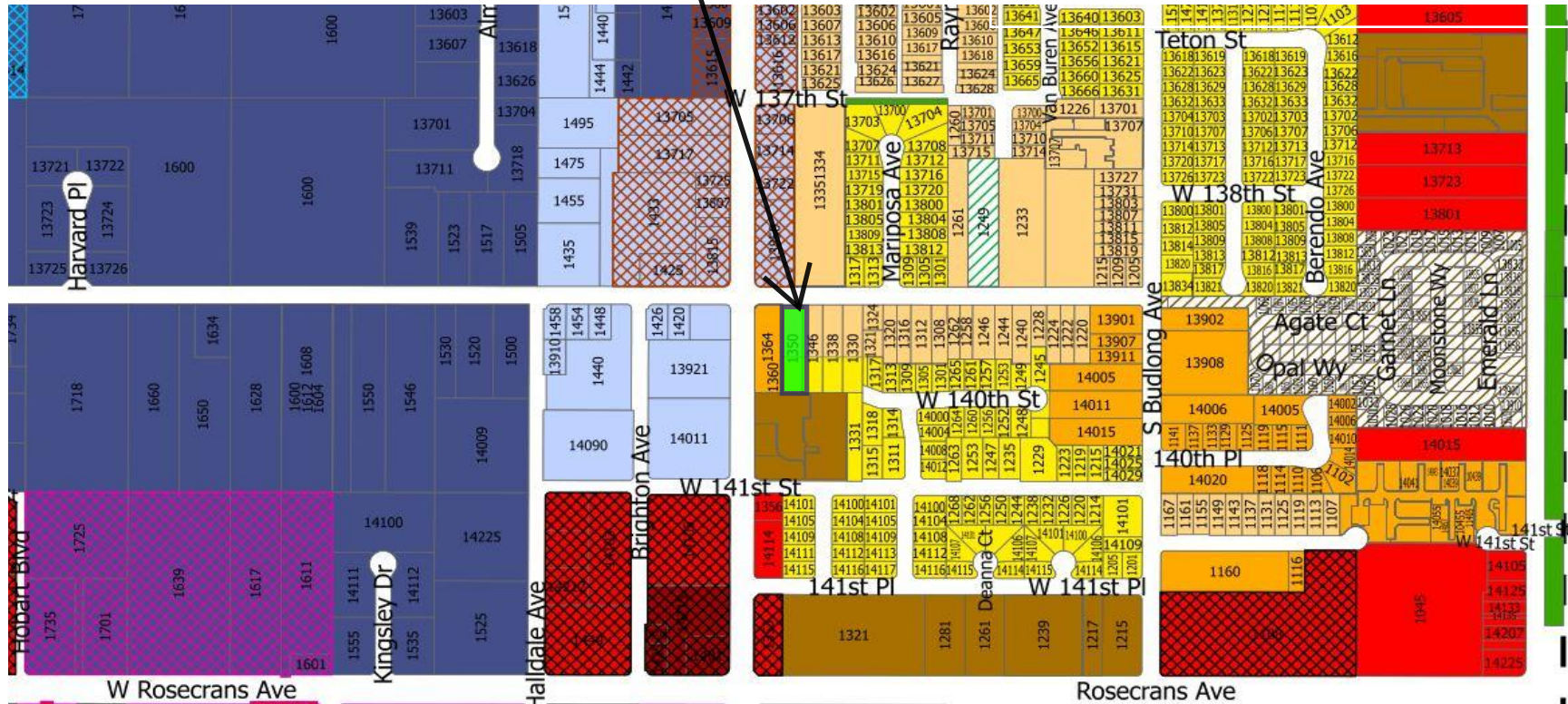
# ARTICLE I - Location and Details of Lot

Property: 1350 W 139th St,  
Gardena, CA 90247

## Property Details:

- Address: 1350 W 139th St, Gardena, CA 90247
- AIN: 6115013025
- Land Sqft: 19,175 sqft

B-1 cont'





ARTICLE I (cont.) - Location and Details of Lot



B-1  
con't

- Property Details:
- Address: 1350 W 139th St, Gardena, CA 90247
  - AIN: 6115013025
  - Land Sqft: 19,175 sqft

1350 W 139th St -  
2-STORY TOWNHOMES

ARTICLE II -  
Rough Sketch of  
Development of Lot  
with 8 Townhomes

Front yard set  
back of 20ft

20.25 ft

64.08 ft

25.16 ft

2-car  
garage

5.26 ft

2-car  
garage

2-car  
garage

Driveway of 25 ft

2-car  
garage

Approx 7,854  
sqft for 8 units.  
Each unit to  
have a 20x20  
garage

2-car  
garage

Side yard set  
back of 5ft

295.98 ft

2-car  
garage

2-car  
garage

28.73 ft  
28.73 ft  
28.73 ft  
28.73 ft  
28.73 ft  
28.73 ft  
28.73 ft  
28.73 ft  
28.73 ft  
28.73 ft

B-1  
con't

2-car  
garage

Open  
space

4 guest  
parking  
spaces  
(10x20)

40.54 ft

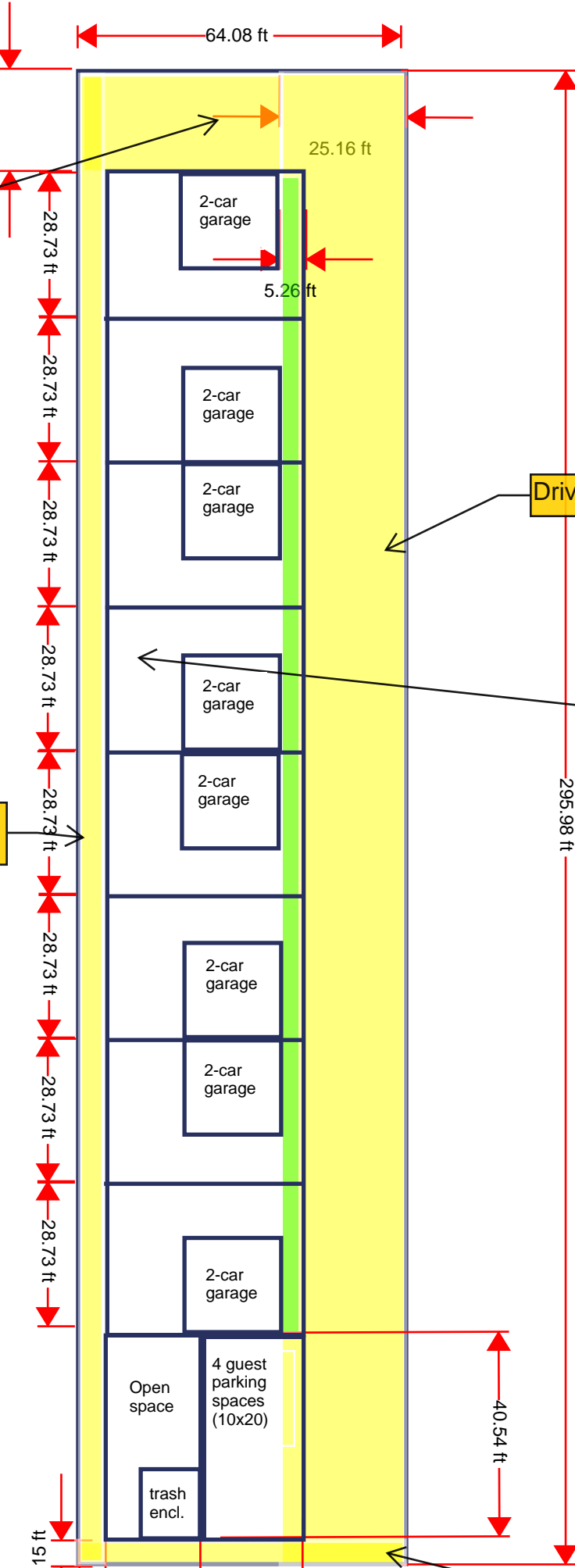
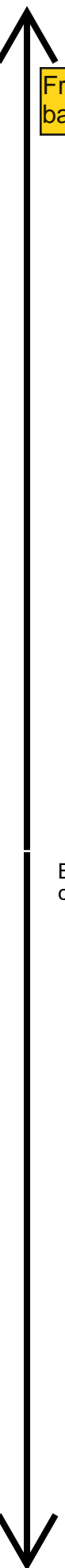
trash  
encl.

ft 51.9

Rear yard set  
back of 5ft

5.16 ft

20.26 ft

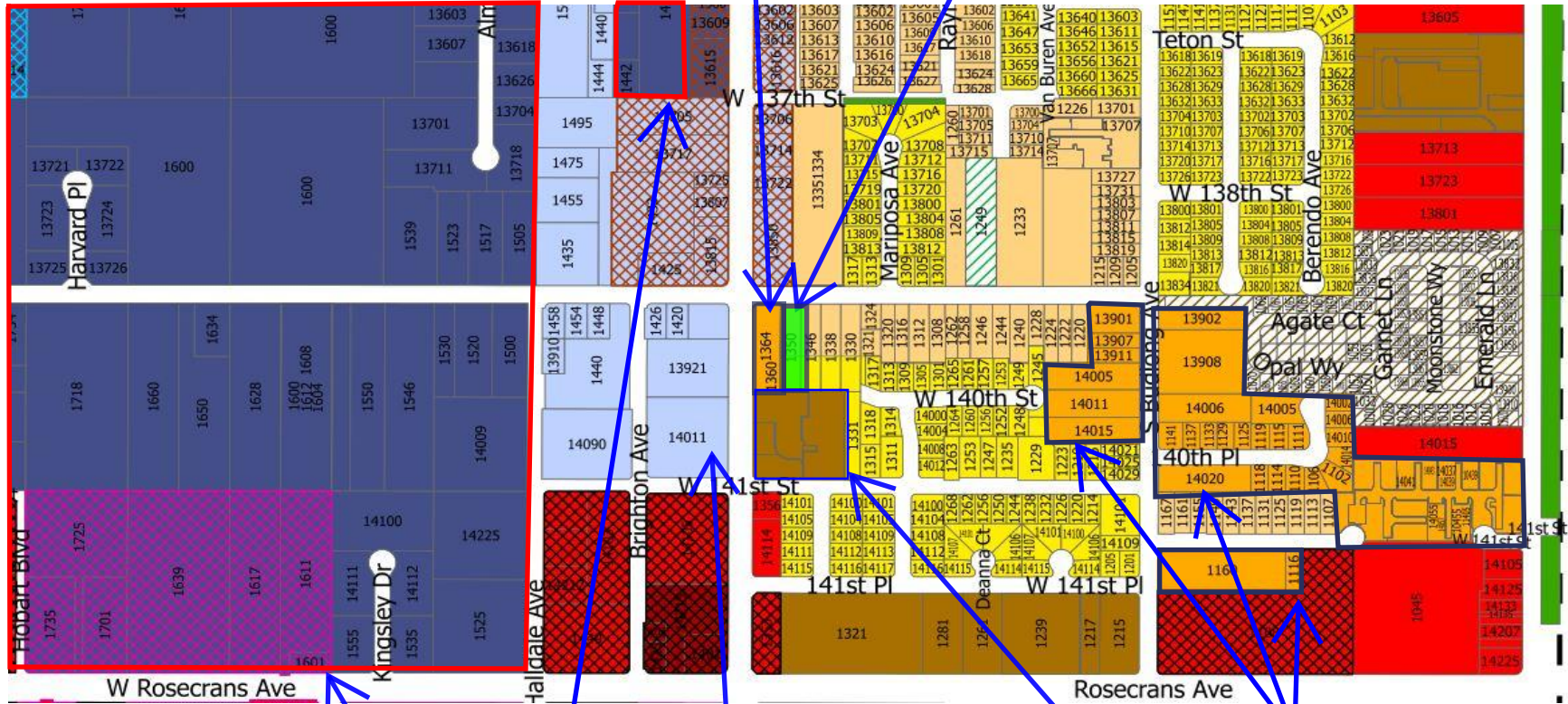




# ARTICLE III - Lots/Properties near our Lot

Neighbor west of our lot is zoned R3. (1360 W 139th St, Gardena, CA 90247)

**OUR LOT**  
Property: 1350 W 139th St, Gardena, CA 90247



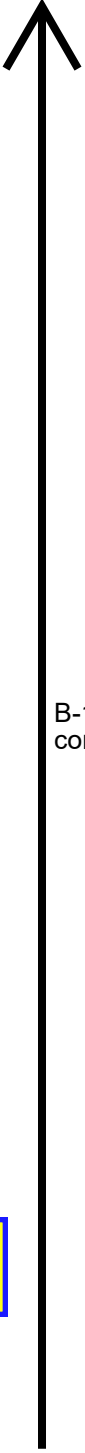
- Zoning 2023
- CR
  - HB
  - M1
  - M2
  - O
  - P
  - R1
  - R2
  - R3
  - R4
  - R6
  - Overlay
  - MUO
  - HO-3
  - HO-4
  - HO-5
  - HO-6
  - C2
  - C3
  - C4
  - CP

Poinsettia Gardens Apartments (13921 S Normandie Ave) located west of our lot

R3 lots located around our Lot

R-4 lot (1452 Azalea Cir) located directly south of our lot

General industrial zone lots located around our lot



B-1 con't



**Response to Comment Letter B**

Mala Patel  
1224 W. 130<sup>th</sup> Street, Gardena  
January 17, 2024

- B-1 This comment requests that the City rezone their property to R3 Zoning (Medium Density Multi-Family Residential District) from the proposed R2 Zoning for the purposes of developing housing units. The comment is noted and will be provided to the decision-makers for consideration. The comment does not challenge the adequacy of the Draft EIR and no further response is warranted.



Caution! This message was sent from outside your organization.

**From:** Danica Nguyen <[dnguyen1@aqmd.gov](mailto:dnguyen1@aqmd.gov)>  
**Sent:** Friday, January 19, 2024 1:47 PM  
**To:** Amanda Acuna <[AAcuna@cityofgardena.org](mailto:AAcuna@cityofgardena.org)>  
**Cc:** Sam Wang <[swang1@aqmd.gov](mailto:swang1@aqmd.gov)>  
**Subject:** Technical Data Request: Proposed City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project

Dear Amanda Acuna,

South Coast AQMD staff received the Draft Environmental Impact Report (EIR) for the Proposed City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project (SCH No. 2023040334) (South Coast AQMD Control Number: LAC240117-03). The public commenting period is from 01/16/2024 to 02/29/2024.

C-1

Upon reviewing the files provided as part of the public review period, I was able to access the Draft EIR and its Appendices via the City's website.

C-2

Please provide all technical documents related to air quality, health risk, and GHG analyses, electronic versions of all emission calculation files, and air quality modeling and health risk assessment files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

1. CalEEMod Input Files (.csv or .json files);
1. EMFAC output files (not PDF files);
1. All emission calculation spreadsheet file(s) (not PDF files) used to calculate the Project's emission sources (i.e., truck operations);
1. AERMOD Input and Output files, including AERMOD View file(s) (.isc);
1. Any HARP Input and Output files and/or cancer risk calculation files (excel file(s); not PDF) used to calculate cancer risk and chronic and acute hazards from the Project;
1. Any files related to post-processing done outside AERMOD to calculate pollutant-specific concentrations (if applicable).

C-3

You may send the files mentioned above via a Dropbox link, which may be accessed and downloaded by South Coast AQMD staff **by COB on Friday, 01/26/2024**. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses promptly. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

C-4

If you have any questions regarding this request, please don't hesitate to contact me.

Regards,

Danica Nguyen  
Air Quality Specialist, CEQA-IGR  
Planning, Rule Development & Implementation  
South Coast Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765  
Phone: (909) 396-3531  
E-mail: [dnguyen1@aqmd.gov](mailto:dnguyen1@aqmd.gov)  
Please note South Coast AQMD is closed on Mondays.

---

**From:** Kevin La <KLa@cityofgardena.org> **On Behalf Of** Amanda Acuna  
**Sent:** Friday, January 19, 2024 4:28 PM  
**To:** Lisa Kranitz Mobile <lkrantzlaw@gmail.com>; sbarker@denovoplanning.com  
**Subject:** FW: Technical Data Request: Proposed City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project

Planning has received a comment on the DEIR. The email is below.

Thanks!

**Kevin La**

Planning Assistant | City of Gardena  
1700 West 162nd Street | Gardena CA | 90247  
Phone 310.217.9524 | [kla@cityofgardena.org](mailto:kla@cityofgardena.org)  
Website: [www.cityofgardena.org](http://www.cityofgardena.org)

---

**From:** [sbarker@denovoplanning.com](mailto:sbarker@denovoplanning.com)  
**To:** ["dnguyen1@aqmd.gov"](mailto:dnguyen1@aqmd.gov)  
**Cc:** ["Amanda Acuna"](#); ["Lisa Kranitz Mobile"](#)  
**Subject:** RE: Technical Data Request: Proposed City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project  
**Date:** Monday, January 22, 2024 4:38:00 PM

---

Hello Danica,

The requested files can be downloaded at the link below. Please note an HRA was not prepared for this project. If you have any issues accessing the files, please let me know.

<https://www.dropbox.com/t/YxNr5meNJzzI9iTP>

Thank you,

Starla

**Starla Barker, AICP** | Principal Planner

De Novo Planning Group | [www.denovoplanning.com](http://www.denovoplanning.com)

[sbarker@denovoplanning.com](mailto:sbarker@denovoplanning.com) | 949-396-8193

**Southern California** | 180 East Main St #108 | Tustin, CA 92780

**Northern California** | 1020 Suncast Ln #106 | El Dorado Hills, CA 95762



### **Response to Comment Letter C**

Danica Nguyen  
South Coast Air Quality Management District  
January 19, 2024

- C-1 This introductory paragraph states that the South Coast Air Quality Management District (SCAQMD) received the Draft EIR. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- C-2 This paragraph states that the SCAQMD was able to access the Draft EIR and appendices for their review. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- C-3 This comment requests an electronic copy of any live modeling and emission calculation files that were used to quantify the air quality impacts from construction and/or operation of the Project be provided to the SCAQMD. A response to this comment with the requested modeling and emission calculation files was sent to SCAQMD on January 22, 2024. Confirmation was received from SCAQMD on January 23, 2024 that the requested files were received and successfully accessed. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- C-4 The comment gives instruction on providing the data to SCAQMD staff. The comment further states that South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner without all files and supporting documentation. The comment does not contain any information requiring changes to the Draft EIR. As noted in Response to Comment C-3, the requested data files were sent to SCAQMD on January 22, 2024 and confirmation of receipt was received on January 23, 2024. No further response is warranted.

It is also noted that no further comments or requests were received from SCAQMD after submittal of the data request.



# COUNTY OF LOS ANGELES FIRE DEPARTMENT



## BOARD OF SUPERVISORS

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1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294  
(323) 881-2401  
[www.fire.lacounty.gov](http://www.fire.lacounty.gov)

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

February 1, 2024

Amanda Acuna  
1700 West 162<sup>nd</sup> Street, Suite 101  
Gardena, CA 90247

Dear Ms. Acuna:

### THE NOTICE OF AVAILABILITY OF A DRAFT EIR, "PROJECT" DOES NOT INVOLVE SITE -SPECIFIC DEVELOPMENT, THE INTENT IS TO PROVIDE ADEQUATE SITES FOR RESIDENTIAL DEVELOPMENT, CITY OF GARDENA, FFER2024000226

The Notice of Availability of a Draft EIR reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

#### PLANNING DIVISION:

We have no comments.

For any questions regarding this response, please contact Kien Chin, at (323) 881-2404 or [Kien.Chin@fire.lacounty.gov](mailto:Kien.Chin@fire.lacounty.gov).

#### LAND DEVELOPMENT UNIT:

Future Development within the requirements of the City of Gardena Land Use Plan, Zoning Code and Zoning Amendment Environmental Impact Report, shall comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

This project does not propose construction of structures or any other improvements at this time. All future development within the City of Gardena shall comply with the requirements set forth in the County of Los Angeles Fire Code. When involved with subdivision in a city contracting

D-1

D-2

#### SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS  
ARTESIA  
AZUSA  
BALDWIN PARK  
BELL  
BELL GARDENS  
BELLFLOWER  
BRADBURY  
CALABASAS

CARSON  
CERRITOS  
CLAREMONT  
COMMERCE  
COVINA  
CUDAHY  
DIAMOND BAR  
DUARTE

EL MONTE  
GARDENA  
GLEN DORA  
HAWAIIAN GARDENS  
HAWTHORNE  
HERMOSA BEACH  
HIDDEN HILLS  
HUNTINGTON PARK  
INDUSTRY

INGLEWOOD  
IRVINDALE  
LA CANADA-FLINTRIDGE  
LA HABRA  
LA MIRADA  
LA PUENTE  
LAKEWOOD  
LANCASTER

LAWDALE  
LOMITA  
LYNWOOD  
MALIBU  
MAYWOOD  
NORWALK  
PALMDALE  
PALOS VERDES ESTATES  
PARAMOUNT

PICO RIVERA  
POMONA  
RANCHO PALOS VERDES  
ROLLING HILLS  
ROLLING HILLS ESTATES  
ROSEMEAD  
SAN DIMAS  
SANTA CLARITA

SIGNAL HILL  
SOUTH EL MONTE  
SOUTH GATE  
TEMPLE CITY  
VERNON  
WALNUT  
WEST HOLLYWOOD  
WESTLAKE VILLAGE  
WHITTIER



fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows and hydrants are addressed during the subdivision tentative map stage.

The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project. Should any questions arise, please contact Nancy Rodeheffer at (323) 890-4243 or [Nancy.rodeheffer@fire.lacounty.gov](mailto:Nancy.rodeheffer@fire.lacounty.gov).

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, brush clearance, vegetation management, fuel modification for Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance.

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

**HEALTH HAZARDOUS MATERIALS DIVISION:**

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

Please contact HHMD Hazardous Materials Specialist III, Jennifer Levenson at (323) 890-4114 or [Jennifer.Levenson@fire.lacounty.gov](mailto:Jennifer.Levenson@fire.lacounty.gov) if you have any questions.

Very truly yours,



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

RMD:pg

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D-2  
con't

—  
D-3

—  
D-4



### **Response to Comment Letter D**

Ronald M. Durbin  
County of Los Angeles Fire Department  
February 1, 2024

- D-1 This comment states that the Planning Division of the County of Los Angeles Fire Department does not have any comments on the Project. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- D-2 These introductory paragraphs acknowledge that site-specific development is not proposed and states that all future development within the City of Gardena must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants. The comment further states that for subdivisions, Fire Department requirements for access, fire flows and hydrants are addressed during the subdivision tentative map stage. The comment is noted. Section 5.13, *Public Services* of the Draft EIR addresses fire protection and emergency services. As stated in Section 5.13 of the Draft EIR, the General Plan includes policies and actions that require all buildings and facilities in the City to comply with regulatory standards related to fire safety, including the Fire Code. The comment is introductory in nature and does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- D-3 This introductory paragraph states that the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, brush clearance, vegetation management, fuel modification for Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. The comment states that the Forestry Division of the County of Los Angeles Fire Department does not have any comments on the Project. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- D-4 This comment states that the Health Hazardous Materials Division of the County of Los Angeles Fire Department does not have any comments on the Project. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.



February 5, 2024

Ref. DOC 7130345

VIA EMAIL [aacuna@cityofgardena.org](mailto:aacuna@cityofgardena.org)

Ms. Amanda Acuna, Senior Planner  
City of Gardena  
1700 West 162<sup>nd</sup> Street  
Gardena, CA 90247

Dear Ms. Acuna:

**NOA Response to City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project**

The Los Angeles County Sanitation Districts (Districts) received a Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the subject project on January 16, 2024. The City of Gardena (City) is located within the jurisdictional boundaries of District No. 5. We offer the following comments regarding sewerage service:

E-1

1. The Districts own, operate, and maintain the Gardena Pumping Plant in the City that serves the local community, the wastewater pumping plant is located at 1919 Artesia Boulevard. Pursuant to California Government Code 53091, the Districts are exempt from the City’s Building and Zoning Codes. The Districts do not object to the proposed land use specified in the draft General Plan at the location of our pumping plant provided that any subsequent ordinance or regulations that may stem from any updates to the land use do not impact or otherwise limit our ability to continue to operate, maintain, or repair the critical wastewater conveyance facilities that serves the local community.

E-2

2. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City except to state that presently no deficiencies exist in Districts’ facilities that serve the City.

E-3

3. Wastewater generated by the residents and businesses in the City is treated at the A.K. Warren Water Resource Facility (formerly known as the Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 237.0 mgd.

E-4

4. For a copy of the District’s average wastewater generation factors, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater Program and Permits and select Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link.

E-5

5. The Districts should review all future individual developments within the City to determine whether or not sufficient trunk sewer capacity exists to serve each development and if Districts’ facilities will be affected by the development. This is accomplished through the Districts’ Will Serve Program. Information for which can be found on our website at [Will Serve Program](#).

E-6



- 6. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts’ Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before future individual development is permitted to discharge to the Districts’ Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, please contact the Districts’ Wastewater Fee Public Counter at (562) 908-4288, extension 2727. If an Industrial Wastewater Discharge Permit is required, connection fee charges will be determined by the Industrial Waste Section. E-7
  
- 7. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts’ wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts’ facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts’ treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service but is to advise the City that the Districts intend to provide this service up to the levels that are legally permitted and to inform the City of the currently existing capacity and any proposed expansion of the Districts’ facilities. E-8

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or [phorsley@lacsd.org](mailto:phorsley@lacsd.org).

Very truly yours,

*Patricia Horsley*

Patricia Horsley  
 Environmental Planner  
 Facilities Planning Department

PLH:plh



### **Response to Comment Letter E**

Patricia Horsley  
Los Angeles County Sanitation Districts  
February 5, 2024

- E-1 This introductory paragraph states that the Draft EIR was received by the Los Angeles County Sanitation Districts (Districts) and that the City is located within the jurisdictional boundaries for District No. 5. The comment is introductory in nature and does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- E-2 This comments states that the Districts own, operate and maintain the Gardena Pumping Plant in the City and that the Districts are exempt from the City's Building and Zoning Codes. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- E-3 This comment states that the Districts own, operate and maintain the large trunk sewers of the regional wastewater conveyance system but that local collectors and/or lateral sewer lines are the responsibility of the jurisdiction they are located in. Therefore, the Districts cannot comment on any deficiencies locally, but state presently no deficiencies existing in the Districts' facilities that serve the City. Section 5.16, *Utilities and Services Systems* of the Draft EIR addresses wastewater services. As stated in Section 5.16 of the Draft EIR, future development projects would be required to implement existing regulations and compliance with the Gardena General Plan and Municipal Code. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- E-4 This comment states that wastewater generated in the City is treated at the A.K. Warren Water Resource Facility (formally known as the Joint Water Pollution Control Plant) which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 237 mgd. As stated in Section 5.16 of the Draft EIR, growth associated with Project implementation would generate 722,040 gpd (0.72 mgd) of wastewater within the Project Area, a net increase of 242,249 gpd (0.24 mgd) over existing conditions, and the facility currently has capacity to serve the Project Area. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- E-5 This comment states that the Districts average wastewater generation factors are available on their website. As stated in Section 5.16 of the Draft EIR, the analysis used the wastewater generation factor of 55 gpd per person from the City's Draft 2021 Sewer Master Plan, which addresses local wastewater conveyance systems for the Project Area. As demonstrated in the Draft EIR, growth associated with Project implementation would generate 722,040 gpd (0.72 MGD) of wastewater within the Planning Area, a net increase



of 242,249 gpd (0.24 MGD) over existing conditions. The Districts' generation factors are based on square footage for non-residential land uses, parcels for residential development less than five units, and number of units for residential development of five units or more. It is noted that existing non-residential uses within the Project Area are generally categorized, whereas the Districts' provide loading for specific classes of land use. Based on the District's generation factors, growth associated with Project implementation would generate a net increase of approximately 583,674 gpd (0.58 mgd) over existing conditions. As noted in Response to Comment E-4, based on the capacity of the A.K. Warren Water Resource Facility of 400 million gallons per day (mgd) and an average flow of 237 mgd that is currently processed, the facility currently has capacity to serve the Project Area utilizing the Districts' average wastewater generation factors. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.

- E-6 This comments states that the District should review future development projects within the City through the Districts' Will Serve Program. As stated in Section 5.16 of the Draft EIR, future development projects would be required to implement existing federal, State and local regulations and comply with the Gardena General Plan and Municipal Code to ensure adequate wastewater treatment capacity. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- E-7 This comment states that the Districts charges a connection fee and payment of the fee may be required before individual development is permitted to discharge to the Districts' sewer system. As stated in Section 5.16 of the Draft EIR, future development projects would be required to implement existing federal, State and local regulations and comply with the Gardena General Plan and Municipal Code to ensure adequate wastewater treatment capacity. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- E-8 This comment states that the Districts wastewater treatment facilities capacities must be consistent with the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Section 5.12, *Population and Housing* of the Draft EIR addresses unplanned population growth. As stated in Section 5.16 of the Draft EIR, the Project does not include site-specific development and would provide for the planning of the potential unplanned growth associated with the Regional Housing Needs Assessment (RHNA) and additional residential development, which would also be considered as part of future updates to plans and programs, including the next update to SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Gardena General Plan also includes policies that regulate direct population and housing growth to ensure adequate services and infrastructure are provided to serve direct



growth associate with site-specific development. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 266-3574  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life*

February 27, 2024

Governor's Office of Planning & Research

**Feb 28 2024**

**STATE CLEARINGHOUSE**

Amanda Acuna, Senior Planner  
City of Gardena  
1700 West 162<sup>nd</sup> Street  
Gardena, CA 90247

RE: City of Gardena Land Use Plan,  
Zoning Code & Zoning Amendment  
(DEIR)  
SCH # 2023040334  
GTS #07-LA-2023-04424  
Vic. LA Multiple

Dear Amanda Acuna,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project proposes the City of Gardena Land Use Plan, Land Use Map, Zoning Code, and Zoning Map Amendment which will facilitate the provision of adequate sites for residential development to accommodate the City's regional housing needs allocation (RHNA) and to allow for additional residential development opportunities should they arise.

F-1

After reviewing the DEIR, Caltrans has the following comments regarding active transportation:

Caltrans understands that the Draft EIR states there is a less than significant impact that the project would conflict with bicycle and pedestrian facilities, and no mitigation measures are required. The project objectives include providing opportunities to align housing with state and local sustainability goals. Caltrans recommends the City of Gardena follow the project objectives and support improvements to sidewalk quality and bike networks throughout the new residential development.

F-2

Additionally, Caltrans supports the Project's consistency with SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). By providing for increased residential development within an urbanized area served by

F-3

"Provide a safe and reliable transportation network that serves all people and respects the environment"

existing transit, the Project would lower Vehicle Miles Traveled (VMT) per capita under the City's cumulative buildout conditions, and consequently lead to reductions in regional greenhouse gas emissions (GHG) and air pollution. We look forward to reviewing future projects that support improvements to neighborhood mobility, increase access to active transportation, and foster healthy communities through long-term sustainable development.

↑  
F-3  
con't

Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends large size truck trips be limited to off-peak commute periods.

F-4

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS #07-LA-2023-04424.

Sincerely,

*Frances Duong*

Frances Duong  
Acting LDR/CEQA Branch Chief

email: State Clearinghouse



### **Response to Comment Letter F**

Frances Duong  
State of California Department of Transportation, District 7  
February 27, 2024

- F-1 This introductory paragraph summarizes the proposed Project. The comment is introductory in nature and does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- F-2 This comment summarizes the finding of the Draft EIR relative to the less than significant impact the Project would have on bicycle and pedestrian facilities. The comment recommends that the City implement the Project's objectives specific to supporting improvements to sidewalk quality and bike networks. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- F-3 This comment supports the Project's consistency with SCAG's 2020 RTP/SCS. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- F-4 This comment notes that future projects would be required to comply with Caltrans requirements for the transportation of heavy construction equipment and/or materials. The comment is noted and no further response is warranted.



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### 3.0 MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that when a public agency completes an environmental document which includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring program. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring program must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6). Specifically, Public Resources Code § 21081.6 states:

*(a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:*

*(1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.*

*(2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.*

This Mitigation Monitoring and Reporting Program (MMRP) has been developed to provide the mechanism by which to monitor mitigation measures outlined in the City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project Environmental Impact Report (EIR). The City of Gardena General Plan, Zoning Code & Zoning Map Amendment Project MMRP has been prepared in conformance with Public Resources Code §21081.6 and City of Gardena (City) monitoring requirements.

State CEQA Guidelines §15097 provides clarification of mitigation monitoring and reporting requirements and guidance to local lead agencies on implementing strategies. The reporting or monitoring program must be designed to ensure compliance during project implementation. The City of Gardena is the Lead Agency for the Project and is therefore responsible for ensuring MMRP implementation. This MMRP has been drafted to meet Public Resources Code §21081.6 requirements as a fully enforceable monitoring program.



The MMRP Checklist is intended to provide verification that all applicable mitigation measures relative to significant environmental impacts are monitored and reported. Monitoring will include: 1) verification that each mitigation measure has been implemented; 2) recordation of the actions taken to implement each mitigation; and 3) retention of records in the Project file.

This MMRP delineates responsibilities for monitoring the Project, but also allows the City flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. Adequate monitoring consists of demonstrating that monitoring procedures took place and that mitigation measures were implemented. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the MMRP Checklist. If an adopted mitigation measure is not being properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

The numbering system in the following table corresponds with the EIR's numbering system. The MMRP table "Verification" column will be used by the parties responsible for documenting when the mitigation measure has been completed. The City of Gardena will complete ongoing documentation and mitigation compliance monitoring. The completed MMRP and supplemental documents will be kept on file at the City of Gardena Community Development Department. As future site-specific residential development projects are proposed, the proposed development would be considered relative to the development assumptions and analysis provided in the Final EIR. The Mitigation Measures contained herein would be placed as conditions, as applicable, on future residential project approvals.



### MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Mitigation Measures	Implementation Timing	Responsible Party	Monitoring Party	Verification		
				Initials	Date	Remarks
<b>AIR QUALITY</b>						
<p>AQ-1: <u>Dust Control</u>. The construction plans and specifications and construction permitting for future development projects shall ensure to the satisfaction of the City of Gardena Community Development Department that the following dust suppression measures in the SCAQMD CEQA Air Quality Handbook will be implemented by the construction contractor to reduce the project’s emissions:</p> <ul style="list-style-type: none"> <li>• Revegetate disturbed areas.</li> <li>• Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph.</li> <li>• Sweep all streets once per day if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).</li> <li>• Install “shaker plates” prior to construction activity where vehicles enter and exit unpaved roads onto paved roads, or wash trucks and any equipment prior to leaving the site.</li> </ul>	<p>Prior to the issuance of grading or building permits, whichever occurs first</p>	<p>Project proponent</p>	<p>City of Gardena Community Development Department</p>			



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<ul style="list-style-type: none"> <li>• Pave, water, or chemically stabilize all onsite roads.</li> <li>• Minimize at all times the area disturbed by clearing, grading, earthmoving, or excavation operations.</li> </ul>						
<p>AQ-2: <u>Tier 4 Construction Equipment</u>. Construction plans and specifications and construction permitting shall include to the satisfaction of the City of Gardena Community Development Department the requirement that for construction equipment greater than 150 horsepower (&gt;150 HP), the construction contractor shall use off-road diesel construction equipment that complies with Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 4 emissions standards during all construction phases and will ensure that all construction equipment be tuned and maintained in accordance with the manufacturer’s specifications.</p>	Prior to the issuance of grading or building permits, whichever occurs first	Project proponent	City of Gardena Community Development Department			
<p>AQ-3: <u>Low VOC Paints</u>. Construction plans and specifications and construction permitting shall include to the satisfaction of the City of</p>	Prior to the issuance of grading or	Project proponent	City of Gardena Community			



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Gardena Community Development Department the requirement that “Super-Compliant” low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD’s Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC.	building permits, whichever occurs first		Development Department			
AQ-4: <u>Electric Construction Equipment</u> . Construction plans and specifications and construction permitting shall state to the satisfaction of the City of Gardena Community Development Department that the construction contractor shall require by contract specifications that construction operations rely on the electricity infrastructure surrounding the construction site, if available rather than electrical generators powered by internal combustion engines.	Prior to the issuance of grading or building permits, whichever occurs first	Project proponent	City of Gardena Community Development Department			
AQ-5: <u>Alternative Fueled Construction Equipment</u> . Construction plans and specifications and construction permitting shall require to the satisfaction of the City of Gardena Community Development Department that the construction contractor use alternative fueled, engine retrofit	Prior to the issuance of grading or building permits, whichever occurs first	Project proponent	City of Gardena Community Development Department			



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technology, after-treatment products (e.g., diesel oxidation catalysts, diesel particulate filters), and/or other options as they become available, including all off-road and portable diesel-powered equipment.						
AQ-6: <u>Construction Equipment Maintenance</u> . Construction plans and specifications and construction permitting shall require to the satisfaction of the City of Gardena Community Development Department that construction equipment be maintained in good operation condition to reduce emissions. The construction contractor shall ensure that all construction equipment is being properly serviced and maintained as per the manufacturer’s specification. Maintenance records shall be available at the construction site for City verification.	Prior to the issuance of grading or building permits, whichever occurs first and on-going during construction activities	Project proponent	City of Gardena Community Development Department			
AQ-7: <u>Construction Vehicle Maintenance Plan</u> . Prior to the issuance of any grading permits, the applicant and/or building operators shall submit construction plans and a construction vehicle management plan to the City of Gardena Community Development Department denoting the proposed schedule	Prior to the issuance of grading or building permits, whichever occurs first and	Project proponent	City of Gardena Community Development Department			



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and projected equipment use. The construction vehicle management plan shall include such things as: idling time requirements; requiring hour meters on equipment; documenting the serial number, horsepower, age, and fuel of all onsite equipment. The plan shall include that California state law requires equipment fleets to limit idling to no more than 5 minutes. Construction contractors shall provide evidence that low emission mobile construction equipment will be utilized, or that their use was investigated and found to be infeasible for the project as determined by the City. Contractors shall also conform to any construction measures imposed by SCAQMD and the City of Gardena Community Development Department.	on-going during construction activities					
<b>CULTURAL RESOURCES</b>						
CUL-1: Applicants for future proposed projects involving sites with intact extant building(s) more than 45 years old shall provide a historic resource technical study, prepared by a qualified architectural historian meeting Secretary of the Interior Standards, evaluating the significance and data potential of the	Prior to the issuance of demolition or grading permits, whichever occurs first	Project proponent	City of Gardena Community Development Department			



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<p>resource under CEQA. If significance criteria are met, detailed mitigation recommendations shall be required as part of the technical study. Development of mitigation measures shall consult <i>The Secretary of the Interior's Standards for the Treatment of Historic Properties</i> to provide guidance for the preservation, rehabilitation, restoration, and reconstruction of historic buildings. When referring to these guidelines, the direct and indirect impacts of the project on a historic resource shall be considered to determine an appropriate treatment for a historic property. In the event a historic building/structure is recommended eligible for listing (as the result of the technical study) but will be demolished or partially demolished as the result of the project, the drafting of a Historic American Building Survey-like (HABS-like) or Historic American Engineering Record-like (HAER-like) may be recommended as part of mitigation. If a <i>listed</i> historic building or structure will be demolished or partially demolished as the result of the project a full HABS or HAER document shall be prepared. Consultation with California SHPO shall be required to determine</p>						





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the level of documentation required on a case-by-case basis to be determined in consultation with the City of Gardena Community Development Department and a qualified architectural historian meeting Secretary of the Interior Standards.						
CUL-2: Applicants for future proposed ground disturbing projects shall be required to either: (1) provide a technical cultural resources assessment consisting of a record search, survey, background context and project specific recommendations performed by a qualified archaeologist meeting Secretary of the Interior Standards to the City of Gardena for review and approval; or if Applicants choose not to provide a technical cultural resources assessment (2) provide documentation to the City of Gardena demonstrating full-time monitoring by an archaeologist and a Native American monitor. If resources are known or reasonably anticipated, the recommendations shall provide a detailed mitigation plan which shall require monitoring during grading and other earthmoving activities in undisturbed sediments, provide a treatment plan for	Prior to the issuance of grading permits	Project proponent	City of Gardena Community Development Department			



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potential resources that includes data to be collected, requires professional identification, other special studies as appropriate, requires curation at a repository for artifacts meeting significance criteria, requires a comprehensive final mitigation compliance report including a catalog of specimens with museum numbers and an appendix containing a letter from the museum stating that they are in possession of the materials.						
<b>GEOLOGY AND SOILS</b>						
GEO-1: Applicants for future proposed projects with planned impacts in undisturbed or native sediments (i.e., sediments that have not been moved or displaced since they were naturally deposited) ranked moderate or above shall be required to either (1) provide a technical paleontological assessment consisting of a record search, survey, background context and project specific recommendations performed by a qualified professional paleontologist who meets the standards set forth by the Society of Vertebrate Paleontology or (2) agree to monitoring all excavations below five feet. If resources are known or reasonably anticipated,	Prior to the issuance of grading permits	Project proponent	City of Gardena Community Development Department			



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the recommendations shall provide a detailed mitigation plan which shall require monitoring during grading and other earthmoving activities in undisturbed sediments, provide a fossil recovery protocol that includes data to be collected, require professional identification, radiocarbon dates and other special studies as appropriate, require curation at a local curation facility such as the John D. Cooper Center operated by the County of Orange for fossils meeting significance criteria, require a comprehensive final mitigation compliance report including a catalog of fossil specimens with museum numbers and an appendix containing a letter from the museum stating that they are in possession of the fossils.						
<b>NOISE</b>						
NOI-1: Prior to issuance of a grading permit, a project applicant shall contract for a site-specific noise study for a parcel within 500 feet of a sensitive use. The noise study shall be performed by an acoustic consultant experienced in such studies, and the consultant's qualifications and methodology to be used in the study must be presented to City	Prior to the issuance of grading permits	Project proponent	City of Gardena Community Development Department			



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staff for consideration. The site-specific acoustic study shall specifically identify potential project impacts upon off-site sensitive uses due to construction. Mitigation shall be required if noise levels exceed 65 dBA.						
NOI-2: Applicants for future proposed projects whose construction utilizes pile drivers within 200 feet of existing buildings or vibratory rollers within 50 feet of existing buildings shall be required to prepare a vibration impact study which would be required to include a detailed mitigation plan to avoid any potential significant impacts to existing structures due to groundborne vibrations, based on the California Department of Transportation’s Construction Vibration Guidance Manual.	Prior to the issuance of grading permits	Project proponent	City of Gardena Community Development Department			