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

Project Name:	1450 Artesia Boulevard Specific Plan Project ("Project")
Project Applicant:	InSite Property Group
Project Address:	1450 West Artesia Boulevard, City of Gardena
Public Comment Period:	Thursday, June 8, 2023 to Monday, July 10, 2023
Public Scoping Meeting:	Thursday, June 22, 2023 at 6:00 PM

Pursuant to California Public Resources Code §21165 and State California Environmental Quality Act (CEQA) Guidelines §15050: Lead Agency Concept, the City of Gardena (City) is the Lead Agency for preparation of an Environmental Impact Report ("EIR") for the proposed 1450 Artesia Boulevard Specific Plan Project ("Project"). In accordance with State CEQA Guidelines §15082: Notice of Preparation and Determination of Scope of EIR, the City has prepared this Notice of Preparation (NOP) to provide responsible and trustee agencies, the Office of Planning and Research, and the County Clerk with sufficient information describing the Project and its potential environmental effects to enable the responsible agencies to make a meaningful response to this NOP.

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

Project Location - The Project site is located on the southwest corner of Artesia Boulevard and Normandie Avenue and was part of the recently rescinded Artesia Corridor Specific Plan. The 1450 Artesia Boulevard Specific Plan would cover approximately 6.33 acres collectively consisting of the sites located on Assessor Parel Numbers 6106-036-010, 6106-036-012, 6106-036-034, 6106-036-035, 6106-036-036, 6106-036-037.

Project Summary - The Applicant seeks approval of the 1450 Artesia Boulevard Specific Plan Project. The Proposed Project would involve the construction and operation of a mixed-use development with a total building area of 268,000 square feet (SF) and an approximate height of 75 feet, including a self-storage use (three levels totaling 186,000 gross square feet (GSF) with 1,480 storage units), an industrial warehouse use (one level totaling 72,000 GSF with ten loading docks), and an office/retail use (a mezzanine totaling 10,000 GSF). The Project's proposed 72,000 GSF of warehouse use includes 10,000 GSF of potential future square footage to account for the potential future acquisition of a 0.23-acre parcel currently occupied by a single residential dwelling unit. Additionally, proposed associated facilities and improvements include perimeter fencing, onsite and perimeter landscaping, lighting, exterior sidewalks, and pavement for on-site parking spaces. Under the Specific Plan, the parking lot area would be used periodically for City-sponsored outdoor events outside of the Project's warehouse/industrial component operating hours.

The Applicant is coordinating with the Atlantic Richfield Company (ARC), which is a responsible party working under the direction of the California Department of Toxic Substances Control (DTSC) to implement a Remedial Action Plan (RAP) by installing an engineered cap, soil vapor probes, and associated infrastructure before the Applicant commences construction of the Proposed Project. The Applicant will undertake measures to protect this remedy and avoid an unreasonable risk of harm to human health and the environment, such as installing soil vapor barrier and ventilation systems beneath the structure to protect building occupants against indoor soil vapor intrusion; recording a land use covenant on the Site to prohibit sensitive uses thereon, such as residential uses, but which would permit the Proposed Project's commercial and industrial uses; complying with all institutional controls that DTSC may require; and undertaking long-term monitoring and maintenance of the soil vapor barrier and ventilation systems for the Proposed Project's building. The Proposed Project structure would only overlap with the remediated Haack Rework area. The portion of the Proposed Project site that overlaps the Haack and Cooper sumps areas would be paved and utilized as a parking lot which would be located atop ARC's engineered cap as part of the DTSC-approved RAP.

Construction of the Proposed Project is expected to last approximately 18 months beginning in March 2024 and ending September 2025. The Proposed Project is anticipated to begin operations in October 2025. The Applicant's timing for construction would not interfere with the implementation of the RAP by ARC, nor with ARC's implementation of the RAP interfere with the Applicant's construction and operation of the Proposed Project.

Project Approvals: The Project will require the following approvals in addition to certification of the EIR, required CEQA findings, and adoption of a mitigation monitoring and reporting program:

- Adoption of the 1450 Artesia Boulevard Specific Plan
- Zone Text Amendment to delete 18.08.015 of the Gardena Zoning Code
- Development Agreement
- Site Plan Review
- Lot Merger to consolidate the 3 lots into one parcel

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

- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

Cortese List Notice: Pursuant to Public Resources Code 21092.6(a), the Project site is listed on several environmental databases, as determined by the regulatory agency database search compiled pursuant to Government Code §65962.5 (California Department of Toxic Substances Control list of various hazardous sites).

Environmental Review - A copy of this NOP and the Initial Study are available for review on the City of Gardena's Website beginning on Thursday, June 8, 2023 at: https://www.cityofgardena.org/community-development/planning-projects/ .

If you cannot access the documents from the website, please contact Amanda Acuna, Senior Planner, at 310.217.6110 or via email at aacuna@cityofgardena.org.

Comment Period - The NOP's public review comment period is from June 8 – July 10, 2023. Public agencies, interested organizations, and individuals have the opportunity to comment on the proposed Project, to identify those environmental issues, potentially affected by the Project, which the City should address further in the EIR. Comments on the NOP can be submitted to Amanda Acuna, Senior Planner, at the City of Gardena by mail at City of Gardena Community Development Department, 1700 West 162nd Street, Gardena, California 90247, or by email at aacuna@cityofgardena.org, no later than 5:00 PM on July 10, 2023. However, e-mail is the preferred method of communication. Please label the subject line "1450 Artesia Boulevard Specific Plan Project/NOP Comment."

Public Scoping Meeting - Pursuant to CEQA Statue §21083.9(a)(2) and State CEQA Guidelines §15082(c), the City of Gardena will hold a public scoping meeting as follows:

When: Thursday, June 22, 2023 at 6:00 PM

Where: City of Gardena City Council Chambers, 1700 West 162nd Street, Gardena, CA 90247

At this meeting, agencies, organizations, and members of the public will receive a brief presentation on the Project and will have the opportunity to provide comments on the scope of the information and analysis to be included in the EIR.

DRAFT

Initial Study

1450 Artesia Boulevard Specific Plan

JUNE 2023

Prepared for:

CITY OF GARDENA
1700 West 162nd Street
Gardena, California 90247
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Acronyms and Abbreviations

Acronym/Abbreviation	Definition [Table Heading (RGB: 15, 43,77)]
APN	Assessor's Parcel Number
ARC	Atlantic Richfield Company
bgs	below ground surface
BMP	best management practice
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Standards
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CERT	Community Emergency Response Training
City	City of Gardena
CNDDB	California Department of Fish and Wildlife California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
DTSC	California Department of Toxic Substances Control
DU	dwelling unit
EIR	Environmental Impact Report
EOP	Emergency Operations Plan
EOP	Emergency Operations Plan
EV	electric vehicle
FAR	Floor Area Ratio
GHG	greenhouse gases
GPD	Gardena Police Department
GSF	gross square feet
I	Interstate
IPaC	Information for Planning and Consultation
IS	Initial Study
LACoFD	Los Angeles County Fire Department
LAUSD	Los Angeles Unified School District
LID	Low Impact Development
LOS	level of service
Metro	Los Angeles County Metropolitan Transportation Authority
NAHC	Native American Heritage Commission
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPDES	National Pollutant Discharge Elimination System

Acronym/Abbreviation	Definition [Table Heading (RGB: 15, 43,77)]
PAH	polynuclear aromatic hydrocarbon
PM_{10}	particulate matter with an aerodynamic diameter equal to or less than 10 microns
$PM_{2.5}$	particulate matter with an aerodynamic diameter equal to or less than 2.5 microns
PRD	Permit Registration Document
Proposed Project	Artesia Boulevard Specific Plan Project
RAP	Remedial Action Plan
RHNA	Regional Housing Needs Assessment
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SEMS	Standardized Emergency Management System
SF	square feet
SOx	sulfur oxides
SR	State Route
SVOC	semi-volatile organic compound
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TEH	total extractable hydrocarbons
TMDL	total maximum daily load
USFWS	U.S. Fish and Wildlife Service
VFH	volatile fuel hydrocarbon
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	Volatile organic compound
WDR	Waste Discharge Requirement

1 Project Description

This chapter describes the proposed 1450 Artesia Boulevard Specific Plan Project, referred to in this document as the "Project" or "Proposed Project"; its location, objectives, and characteristics; and its intended uses. The Proposed Project would involve the construction and operation of a mixed-use development with a total building area of 268,000 square feet (SF) and an approximate height of 75 feet, including a self-storage use (three levels totaling 186,000 gross square feet (GSF) with 1,480 storage units), an industrial warehouse use (one level totaling 72,000 GSF with ten loading docks), and an office/retail use (a mezzanine totaling 10,000 GSF). The Project's proposed 72,000 GSF of warehouse use includes 10,000 GSF of potential future square footage to account for the potential future acquisition of a 0.23-acre parcel currently occupied by a single residential dwelling unit (DU). Additionally, proposed associated facilities and improvements include perimeter fencing, onsite and perimeter landscaping, lighting and exterior sidewalks.

Vehicular access to the Project site would be provided via one dedicated 90--foot driveway with a raised separation median to separate the entry and exit sides of the driveway on Artesia Boulevard. The driveway provides for right-turn in and right-turn out only. The Project proposes 124 automobile parking stalls and 10 dock doors. Parking would be located on the northeastern portion of the site. The loading dock doors would be oriented to face east. Trucks would enter the Project site from Artesia Boulevard and travel south, then east around the building, entering into the truck loading area. The truck loading area would be gated and only used for the industrial Project component of the Project. Trucks would exit the Project site by travelling along the eastern and northern perimeter to the site entrance/exit on Artesia Boulevard. Daily activities within the Project site would include maneuvering forklifts, lift equipment, and large semi-trucks through and around the site and backing into the loading docks.

The Proposed Project would redevelop parcels that are underutilized and have been impacted by releases of hazardous substances and waste. These parcels, which include the Gardena Sumps, will be remediated by Atlantic Richfield Company (ARC) with the implementation of a Remedial Action Plan (RAP) as overseen by the California Department of Toxic Substances Control (DTSC) and detailed below. The remedial measures will include an engineered cap over impacted soils, soil vapor probes and related features, while the Project's building will have as a part of its foundation a soil vapor barrier with ventilation systems designed to prevent indoor soil vapor intrusion. As implemented, the RAP will protect human health and the environment and make the Project site available for use and occupancy for its intended commercial and industrial uses. Environmental review for the implementation of the RAP was completed by DTSC (State Clearinghouse Number 2022020305), and a Notice of Determination was filed for the adoption of the Initial Study/Mitigated Negative Declaration on June 17, 2022.

The Project site is located on the southwest corner of Artesia Boulevard and Normandie Avenue and was part of the recently rescinded Artesia Corridor Specific Plan. The Project site still has a land use designation of Specific Plan and has a new zoning of 1450 Artesia Specific Plan. Pursuant to Section 18.08.015 of the Gardena Municipal Code, no development may occur on the site until a new specific plan is adopted.

The 1450 Artesia Boulevard Specific Plan area would include one existing residential property in the southwestern corner (APN 6106-036-010) which is not part of the Project's current development footprint and would remain as a legal non-conforming use. However, for the purposes of the environmental impact analysis, the residential use is assumed to either remain or to be replaced with 10,000 square feet of future Project development, depending which scenario results in more environmental impacts for a given environmental resource area. A list of permits and approvals from the City that are required to complete the Proposed Project include, but are not necessarily limited to the following:

- **Adoption of the 1450 Artesia Boulevard Specific Plan.** The proposed 1450 Artesia Boulevard Specific Plan would include Project-specific development standards, including the proposed height, density, parking standards, and other development standards. The Specific Plan would permit a maximum height of approximately 75 feet and a maximum Floor Area Ratio (FAR) of 1.[1]
- **Zone Text Amendment.** Section 18.08.015 of the Gardena Zoning Code will be deleted.
- **Development Agreement.** A Development Agreement is also being proposed in conjunction with the Proposed Project.
- **Site Plan Review.** A site plan will be developed to ensure that the Project and physical design are consistent with the 1450 Artesia Boulevard Specific Plan and General Plan.
- **Lot Merger.** The Project Site contains five lots that would be consolidated into one lot as part of the Proposed Project; the non-conforming residential use (APN 6106-036-010) would remain its own parcel.
- An Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) and the CEQA Guidelines Section 15124;
- A mitigation monitoring and reporting program; and
- Required CEQA findings.

1.1 Project Location

The Proposed Project site is located in Gardena, California. Gardena is a city of just under 60,000 residents in the inland South Bay region of the Los Angeles metropolitan area. The City is regionally accessible by several major freeways including Interstate (I)-405, I-110, I-105 and State Route (SR)-91 (Artesia Boulevard). The Proposed Project site is located at the corner of Artesia Boulevard and Normandie Avenue, two major thoroughfares within the City (Figure 1, Project Location).

The 1450 Artesia Boulevard Specific Plan would cover approximately 6.33 acres collectively consisting of the sites located on Assessor Parel Numbers 6106-036-010, 6106-036-012, 6106-036-034, 6106-036-035, 6106-036-036, 6106-036-037 (collectively, the "Property").The Property currently contains three industrial structures (8,080 square feet, 825 square feet, and 3,159 square feet), a paved, open area along Artesia Boulevard (1450 Artesia Boulevard), and one residential dwelling unit behind the industrial properties adjacent to the Dominguez Channel (1450, 1452, 1462 and 1472 West Artesia Boulevard) (Figure 2, Existing Conditions). The dwelling unit at 1472 Artesia West Artesia Boulevard (APN 6106-036-010) is occupied.

[1] The FAR is based on the total Project Site area.

1.2 Environmental Setting

1.2.1 Existing Conditions

Part of the Project site, in the northeastern section contains what is known as the Gardena Sumps. This area is contaminated with oil sludge contamination from three sumps. On June 17, 2022, the Department of Toxic Substances Control (DTSC) approved a Remedial Action Plan (RAP) for the Gardena Sumps on two properties (known as the Cooper and Haack properties) which was submitted by ARC. The RAP, which will be carried out by ARC, proposes excavation of impacted soils on a portion of the site, known as the Haack Rework Area, relocation of those contaminated soils to another portion of the site, known as the Cooper Sumps area, installation of an engineered cap with a specialized geosynthetic cover and clean soil cover over the Haack Sump and Cooper Sumps, and soil vapor probes. These areas are shown in Figure 3, Site Contamination. ARC will be submitting a Remedial Design Implementation Plan to DTSC, detailing the implementation of the RAP. The Applicant will be submitting a separate RAP to DTSC to ensure that the Proposed Project protects against an unreasonable risk to human health and the environment and that it will not adversely affect the integrity, operation and maintenance of ARC's RAP.

The northwestern portion of the Project site, which overlaps with the Haack property, currently contains warehouses totaling approximately 12,064 square feet and a variety of trailer-type storage structures that house several small businesses, including a U-Haul rental agency, a metal fabricating shop, a sandblasting and painting company and an auto body repair shop (Geosyntec 2021). The southern portion of the Project site contains one residential dwelling unit. The Haack Rework area overlaps the northernmost portion of the two easternmost residential properties (Figure 2, Existing Conditions).

1.2.2 Prior Land Uses

Historical use of the Project site seems to have begun in the 1920's with portions of the site being used for clay mining operations. By the late 1920's, some of the site was used for growing crops and some residential uses were present. Creation of the disposal sumps, shown in Figure 3, which are the source of the contamination subject to cleanup by ARC under DTSC oversight, occurred sometime between 1938 and 1941. By 1946, all three sumps were filled with sludge. Development continued over portions of the sump areas in the following years, including excavations which changed the grade and elevation of the site, as well as construction of parking lots and buildings. The Dominguez Channel was channelized and relocated from north of the Project site to south of the Project site between 1956 and 1958. The two Cooper sumps were capped with geosynthetic material in 1993, and the DTSC interim cover was constructed in approximately 1994. The Cooper sump area (northeastern portion of the Project site) remains vacant and undeveloped while several structures, as described above, are present on the Haack property (northwestern portion of the Project site) (Stantec 2008).

1.2.3 Surrounding Land Uses

The area north of the Project site across Artesia Boulevard consists of a strip mall with a variety of retail and fast-casual restaurant uses. Multi-family and single-family residential uses are located

north of the strip mall. The eastern edge of the Project site is bounded by a Southern Pacific Railroad line. To the east of the Project site across Normandie Avenue is another strip mall with a variety of retail, fast food and fast casual restaurant uses. A row of single-family homes is also located to the east across Normandie Boulevard. Multi-family residential uses are located to the west of the Project site with another strip mall farther west. The southern side of the Project site is bounded by the Los Angeles County Department of Public Works Dominguez Flood Channel. An equestrian stable is located south of the channel.

1.2.4 Existing Public Services and Utilities

The Project site is located in an urbanized area and is generally surrounded by existing commercial and residential development. As such, the Project area is supported by utilities and public services. Table 1 outlines the providers that would serve the Proposed Project.

Table 1. Public Services and Utilities

Service Type	Service Provider
Fire protection	City of Los Angeles and Los Angeles County Fire Departments
Police protection	Gardena Police Department
Public Schools	Los Angeles Unified School District
Library	Mayme Dear Library and Masao W. Satow Library
Water supply	Golden State Water Company
Sewer lines	City of Gardena Public Works Department
Sewage treatment	Los Angeles County Sanitation District Joint Water Pollution Control Plant
Gas supply	Southern California Gas Company
Electric supply	Southern California Edison
Telecommunications	Multiple providers
Stormwater drainage	City of Gardena Public Works Department
Solid waste collection and disposal	Waste Resources of Gardena
Transit services	*Bus services:* G Trans (City of Gardena), Los Angeles County Metropolitan Transportation Authority (Metro)

1.3 Project Objectives

Section 15124(b) of the CEQA Guidelines states that the project description of an EIR shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the Project is to develop an industrial/distribution, office/retail and self-storage development at an infill location that is being remediated for occupation within a commercial, urbanized area of the City.

The Proposed Project's specific objectives are provided below:

- Redevelop an underutilized, blighted and environmentally impacted property with economically vibrant industrial and commercial uses along a major development corridor within the City.
- Develop appropriate uses in an area with a legacy of contamination in a manner that protects human health and the environment and allows for continued monitoring of remediated areas.
- Produce short-and long-term jobs during the Proposed Project's construction and operations phases.
- Generate property tax revenues for the City to enhance its services to the community and infrastructural improvements.
- Provide the City a substantial monetary public benefit to the City's General Fund.
- Provide the City with a space to host periodic community outdoor events.

1.4 Project Characteristics

Project Features

Per the 1450 Artesia Boulevard Specific Plan, the footprint of the proposed structure would be 72,000 square feet with a maximum height of 75 feet. The total building area would be 268,000 square feet, with the following proposed uses; 72,000 gross square feet of warehouse/industrial uses on the ground floor, including 10 loading docks, 10,000 square feet of office/retail uses on a mezzanine level, and 186,000 square feet of self-storage uses on the top four floors which includes 1,480 storage units. As noted above, the 72,000 gross square feet of warehouse use includes 10,000 gross square feet of potential future square footage to account for the potential future acquisition of the 0.23-acre parcel currently occupied by one single-family dwelling unit (1472 Artesia West Artesia Boulevard/APN 6106-036-010). The tenant identified for management of the self-storage component would be Secure Space. Tenants for the other uses have not been identified at this time. The Proposed Project would include approximately 124 parking spaces, including five accessible space, and 15 electric vehicle (EV)-ready spaces. The Proposed Project would include traffic improvements on Artesia Boulevard at the facility's entrance/exit at the western edge of the Proposed Project site (Figure 4, Site Plan).

The Proposed Project would have soil vapor barrier and ventilation systems beneath the structure to protect building occupants against indoor soil vapor intrusion. The Applicant is coordinating with ARC to have this cap and probes and associated infrastructure installed and approved by DTSC before the Applicant commences construction of the Proposed Project. The Applicant's RAP is anticipated to include a land use covenant to limit future uses of the site, but which would permit the Proposed Project's commercial and industrial uses, and long-term monitoring and maintenance of the soil vapor barrier and ventilation system for the Proposed Project's buildings. The Proposed Project structure would only overlap with the remediated Haack Rework area. The portion of the Proposed Project site that overlaps the Haack and Cooper sumps areas would be paved and utilized as a parking lot which would be located atop the cap implemented as part of the DTSC-approved RAP. Under the Specific Plan, the parking lot area would be used periodically for City-sponsored outdoor events outside of the Project's warehouse/industrial component operating hours.

Construction of the Proposed Project is expected to last approximately 18 months beginning in March 2024and ending September 2025. The Proposed Project is anticipated to begin operations in October 2025. The Applicant's timing would not interfere with the implementation of the RAP by ARC, nor with ARC's implementation of the RAP interfere with the Applicant's timing.

Special Events

Under a proposed Development Agreement with the Applicant between the Applicant and the City, the City will be allowed to host various special events on an approximately 36,000-square-foot portion (0.8 acre) of the Project's parking area (over approximately 62 parking spaces). The City anticipates hosting several types of medium-size special events, such as:

- Food trucks
- Farmer's markets
- Car shows
- Live entertainment
- Food giveaways
- Mobile vaccination events

The special events would be held approximately two to three times per month, including weekday evening events (after 6:00 p.m.) and weekend daytime events. Thus, the special events would be held when the industrial/warehouse use is not in operation and its parking area is not in use.

General Plan and Zoning

The City recently amended the Land Use and Zoning for hundreds of properties in the City in compliance with adoption of the 6th Cycle Housing Element. The Project site has retained its Specific Plan land use designation, and the zoning has been changed to 1450 Artesia Specific Plan. The Land Use Plan notes that the specific plan will be for industrial and commercial development. The zoning requires adoption of a specific plan before any development can take place.

Although not part of the Project's current development footprint, the proposed 1450 Artesia Boulevard Specific Plan area would include the approximately 0.23-acre parcel situated at the Project site's southwest corner that is currently occupied by one single-family residential DU. Because this single-family residential DU would remain upon adoption of the proposed 1450 Artesia Boulevard Specific Plan, this DU would become a legal non-conforming use. As this last parcel may be acquired and incorporated into the Project, the environmental impacts resulting from the potential future acquisition of the 0.23-acre parcel are included in the Project analyses when its inclusion results in the most conservative analysis for a given environmental resource area.

1.5 California Environmental Quality Act

The California Environmental Quality Act ("CEQA"), Public Resources Code Sections 21000 et seq., applies to a "project," which is defined under CEQA as an activity which may cause either a direct or reasonably foreseeable physical change in the environment, and which is initiated by, funded by, or requires discretionary approvals from state or local government agencies. (Public Resources Code §

21065.) The Proposed Project constitutes a "project," as defined under CEQA. CEQA Guidelines Section 15367 states that a "Lead Agency" is "the public agency which has the principal responsibility for carrying out or approving a project." Therefore, the City of Gardena is the Lead Agency responsible for compliance with CEQA for the Proposed Project.

The City has prepared this Initial Study (IS) in accordance with the CEQA Guidelines to determine if the Proposed Project could have the potential to cause significant adverse environmental impacts. Based on the conclusions of the Initial Study evaluation (contained in Section 2 of this document), the City has determined that the Proposed Project may have a significant effect on the environment and, therefore, the City will prepare an Environmental Impact Report (EIR) pursuant to CEQA. Since the analysis in the Initial Study determined that the Proposed Project would not result in significant impacts for some environmental categories, the City proposes to eliminate the following topics from further evaluation in the EIR: Aesthetics, Agriculture and Forestry Resources, Biological Resources, Mineral Resources, Population and Housing, Public Services, Recreation, and Wildfire.

Ultimately, the EIR prepared for the Proposed Project will be a public document used by the City to analyze the environmental effects of the Proposed Project and to disclose possible ways to reduce or avoid significant environmental impacts, including alternatives to the Proposed Project. As an informational document, the EIR prepared for the Project will not make recommendations for or against approving the Project. The main purpose of the EIR will be to inform public agency decision makers and the public about potential environmental impacts of the Project (CEQA Guidelines Section 15121). The EIR will ultimately be used by the City, as the lead agency under CEQA, in making decisions with regard to the adoption of the Proposed Project described herein and the related approvals described below in Section 1.6.

1.6 Required Project Approvals

1.6.1 City Permits and Approvals

The Project would require discretionary approval from the City. A list of permits and approvals from the City that are required to complete the Proposed Project include, but are not necessarily limited to the following:

- **Adoption of the 1450 Artesia Boulevard Specific Plan.** The proposed 1450 Artesia Boulevard Specific Plan would include Project-specific development standards, including the proposed height, density, parking standards, and other development standards. The Specific Plan would permit a maximum height of approximately 75 feet and a maximum Floor Area Ratio (FAR) of 1.[2]
- **Zone Text Amendment.** Section 18.08.015 of the Gardena Zoning Code will be deleted.
- **Development Agreement.** A Development Agreement is also being proposed in conjunction with the Proposed Project.
- **Site Plan Review.** A site plan will be developed to ensure that the Project and physical design are consistent with the 1450 Artesia Boulevard Specific Plan and General Plan.

[2] The FAR is based on the total Project Site area.

- **Lot Merger.** The Project Site contains five lots that would be consolidated into one lot as part of the Proposed Project; the non-conforming residential use (APN 6106-036-010) would remain its own parcel.
- An Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) and the CEQA Guidelines Section 15124;
- A mitigation monitoring and reporting program; and
- Required CEQA findings.

1.6.2 Approvals and Review from Other Agencies

Permits and approvals from other agencies, and/or coordination with other agencies, may also be required in association with the Proposed Project. DTSC has been identified as a responsible agency for the Project. DTSC has approved the ARC RAP for the portion of the site under the cleanup order (not part of the Proposed Project) and will need to approve the anticipated Remedial Action Plan that the Applicant will prepare.

Other agencies that may have involvement for permits, approvals, and/or coordination are listed as follows:

- State Water Resources Control Board – Applicant must submit a Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System (NPDES) Permit
- Utility providers – Utility connection permits
- Los Angeles County Fire Department

1.6.3 Related Environmental Review and Consultation Requirements

Related environmental review and consultation requirements for the Proposed Project include the following:

- **Assembly Bill 52 Tribal Consultation:** Pursuant to Assembly Bill 52, the City sent notification letters to tribal groups that have requested such notification.
- **Senate Bill 18 Tribal Consultation:** Pursuant to Senate Bill 18, the Native American Heritage Commission provided and obtained a list of tribes to be notified of the Project under Senate Bill 18 and notification letters have been sent to these Tribes as well.

2 Initial Study Checklist

1. **Project title:**

   1450 Artesia Boulevard Specific Plan

2. **Lead agency name and address:**

   City Of Gardena
   1700 West 162nd Street
   Gardena, California 90247

3. **Contact person and phone number:**

   Amanda Acuna
   1700 West 162nd Street
   Gardena, California 90247

4. **Project location:**

   1450 W Artesia Boulevard, Gardena, California

5. **Project sponsor's name and address:**

   InSite Property Group
   19191 S. Vermont Ave, Suite 680
   Torrance, California 90502

6. **General plan designation:**

   Specific Plan (Figure 5, Land Use)

7. **Zoning:**

   1450 Artesia Specific Plan (Figure 6, Zoning)

8. **Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

   Refer to Chapter 1 of this Initial Study

9. **Surrounding land uses and setting (Briefly describe the project's surroundings):**

   Refer to Section 1.2.3 of this Initial Study

10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

    Refer to Section 1.6.2 of this Initial Study

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.?**

    Refer to Section 2.18 of this Initial Study for details.

    Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," 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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:
   a. The significance criteria or threshold, if any, used to evaluate each question; and
   b. The mitigation measure identified, if any, to reduce the impact to less than significance

2.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
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?	☐	☐	☒	☐

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

Less than Significant Impact. Scenic vistas are typically considered to be views of scenic resources that are available from public vantage points. The City is generally flat and urbanized and the City's General Plan does not designate any scenic resources or vistas. The City has limited distant views of the Santa Monica Mountains, the San Gabriel Mountains and the Palos Verdes Peninsula (City of Gardena, 2006b) which would not be impacted by the Proposed Project. The Proposed Project Site is also not in the vicinity of any hillside or ridgeline areas which are considered to be scenic resources by the County of Los Angeles (Los Angeles

County, 2015). As such, impacts to scenic vistas would be less than significant, and this issue will not be further evaluated in the EIR.

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 officially designated or eligible state scenic highways within the vicinity of the Proposed Project. The nearest state scenic highways are two eligible highways, Route 19 in Long Beach and Route 187 in coastal Santa Monica, which are more than 10 miles southeast and 12 miles northwest of the Proposed Project Site, respectively (CALTRANS, 2018). Neither highway is visible from the Project Site. As such, the Proposed Project would have no impact on scenic resources within a state scenic highway, and this issue will not be further evaluated in the EIR.

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

Less than Significant Impact. The Proposed Project Site is located within an urbanized area and is surrounded on all sides by existing urban development. The Proposed Project includes adoption of the 1450 Artesia Boulevard Specific Plan which would include development standards such as building materials, maximum building height and intensity, architectural requirements, lighting standards and landscaping requirements which the proposed development would adhere to, and which would ensure that, impacts to the visual character of the area are less than significant, and this issue will not be further evaluated in the EIR.

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 Proposed Project would include development of the Project Site with industrial/distribution, office/retail and self-storage uses which would introduce new lighting from sources within the building as well as parking and exterior security lighting. The use of reflective building materials in the construction of the building would add a new source of glare. However, the Proposed Project would be designed and constructed in accordance with the City's municipal code and development standards. Additionally, the Proposed Project includes adoption of the 1450 Artesia Boulevard Specific Plan which would include site-specific development standards such as building material and lighting standards. Adherence to those standards would ensure that impacts relating to light and glare would be less than significant, and this issue will not be further evaluated in the EIR.

2.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. 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. 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:				
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?	☐	☐	☐	☒

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 Proposed Project Site is located in an urbanized area and is identified as Urban and Built-Up Land (California Department of Conservation, 2022). The closest identified farmland is a strip of Unique Farmland that runs along the opposite side of the Dominguez Channel between South Vermont Avenue and South Normandie Avenue (less than 0.1 mile southeast of the Project Site). Another strip of Unique Farmland is located on the opposite side of the Dominguez Channel approximately 0.4 mile southwest of the Project Site (California Department of Conservation, 2022). However, the farmland is separated from the Proposed Project Site by the Dominguez Channel and will not be impacted by the Proposed Project. As such, the Proposed Project would have no impact related to the conversion of Farmland to non-agricultural uses, and this issue will not be further evaluated in the EIR.

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

No Impact. As described in (a) above, the Proposed Project Site is urbanized. The site is zoned does not contain agricultural uses or Williamson Act contracts. As such, the Proposed Project would have no impact related to zoning for agricultural uses, and this issue will not be further evaluated in the EIR.

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. As described in (a) and (b) above, the Proposed Project Site is in an urbanized area and is zoned for industrial and commercial uses under the 1450 Artesia Specific Plan, which does not contain forest or timberland uses. As such, the Proposed Project would have no impact on zoning for forest land or timberland, and this issue will not be further evaluated in the EIR.

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

No Impact. The Proposed Project Site does not contain any forest land nor is any forest land located within the vicinity of the site. As such, the Proposed Project would have no impact related to the loss or conversion of forest land to non-forest uses, and this issue will not be further evaluated in the EIR.

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. The Proposed Project would include development of commercial, self-storage and industrial/warehouse uses in a highly urbanized area where such uses are consistent with the

surrounding area. As described in (a) through (d) above, the Proposed Project would have no impact on farmland or forest land, and this issue will not be further evaluated in the EIR.

2.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. 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:				
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?	☐	☐	☒	☐

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

Potentially Significant Impact. A significant impact may occur if the Proposed Project is not consistent with the applicable air quality plan or would interfere with implementation of the policies of that plan. The Project Site is within the South Coast Air Basin (SCAB), and the applicable plan is the Air Quality Management Plan prepared by the South Coast Air Quality Management District (SCAQMD). Construction and operation of the Project could result in an increase in emissions by increasing the land use intensity at the Project Site, having the potential to conflict with the Air Quality Management Plan. Further analysis of this issue will be provided in the EIR.

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?

Potentially Significant Impact. Construction emissions associated with development of the Proposed Project would temporarily emit pollutants to the local airshed from dust and on-site equipment, construction worker vehicles, delivery trucks, and off-site haul trucks. Volatile organic compounds (VOCs), nitrogen oxides (NOx), carbon monoxide (CO), particulate matter with an aerodynamic diameter equal to or less than 10 micros (PM_{10}), particulate matter with an aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), and sulfur oxides (SOx) emissions are the main pollutants that would result from construction. Project operation would also emit pollutants associated with vehicular traffic, area sources (consumer products, architectural coatings, landscaping equipment), and energy sources (natural gas, appliances, and space and water heating).

Criteria pollutants under nonattainment in the SCAB are ozone and particulate matter (PM_{10} and $PM_{2.5}$) (SCAQMD 2017). The Proposed Project would generate VOC and NOx emissions (which are precursors to ozone) and emissions of PM_{10} and $PM_{2.5}$. Further analysis is required to determine the Proposed Project's potential to result in a cumulatively considerable net increase of these criteria pollutants. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. Sensitive receptors (residences) are located approximately 30 feet from the Project Site. A single residence is also located within the Project Site, in the southwest corner. The Proposed Project may generate toxic air contaminant emissions during construction of the Project. Additionally, the operational emissions associated with the Project could expose sensitive receptors to pollutant concentrations as well. As such, further analysis is required regarding the air pollutant emissions that would result from the Proposed Project, and whether a substantial impact to sensitive receptors would result. Therefore, this issue will be further analyzed in the EIR.

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. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

During Project construction, exhaust from equipment may produce discernible odors typical of most construction sites. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. However, such odors would disperse rapidly from the Project Site and would generally occur at magnitudes that would not affect substantial numbers of people. Land uses and industrial operations associated with operational odor complaints include agricultural uses, wastewater

treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). Operation of the Proposed Project would not entail any of these potentially odor-causing land uses. Furthermore, during construction and operation of the Proposed Project, the applicant, construction contractor, and Project operators would be required to comply with SCAQMD Rules 401, 402, and 403. Rule 401 prohibits discharge of air contaminants that are dark in shade or that obscure an observer's view for more than three minutes over the course of an hour. Rule 402 prohibits discharge of air contaminants that cause injury, detriment, nuisance, or annoyance to a considerable number of people or to the public, or that endanger the comfort, repose, health, or safety of people or the public, or that cause or have a natural tendency to cause injury or damage to business or property. Rule 403 requires implementation of dust control measures during activities capable of generating fugitive dust. Due to the nature of Proposed Project construction and operation, and upon compliance with applicable SCAQMD rules, the Proposed Project would not create any new sources of odor during construction or operation. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

2.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

The Project is within a highly urbanized area with residential and industrial land uses dominating the landscape. Under the existing conditions, the Project Site is developed with paved surfaces, buildings, and landscaped areas, with no native or naturalized vegetation communities present (Google Maps 2022). Historic aerial imagery of the Project Site indicates that the Project Site and surrounding area has been developed from since at least 1963 (Nationwide Environmental Title Research 2022). This includes the construction of the Dominguez Channel located 90 feet to the south of the Project Site, which is a three-sided concrete culvert. The northeastern section of the Project site, known as the Gardena Sumps, contains oil sludge contamination from three sludge disposal sumps which were created sometime between 1938 and 1941 and were filled with sludge by 1946. This area has also been subjected to previous disturbance associated with cleanup actions associated with the contamination.

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. Relevant databases that contain information on candidate, sensitive, and/or special status species include: the California Department of Fish and Wildlife California Natural Diversity Database (CNDDB) (CDFW 2022); the California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants (CNPS 2022); and the U.S. Fish and Wildlife Services (USFWS) Information for Planning and Consultation (IPaC) Database (USFWS 2022a). The results of these queries included 49 special-status plant species and 47 special-status wildlife species have recorded occurrences in the U.S. Geologic Survey's *Inglewood, California* 7.5-minute topographic quadrangle, which contains the Project Site, and surrounding quadrangles, as well as species from IPaC. Appendix A of this IS includes the results of the queries of the CNDDB, CNPS Inventory, and IPaC.

The Project Site does not have the potential to contain any special status plant or wildlife species since suitable habitat is not present on site or adjacent to the Project Site. The buildings onsite and in the vicinity are maintained and would provide little to no value to roosting bats; however, it is expected that bats would forage in the area. No critical habitat has been designated that contains the Project Site or adjacent areas (USFWS 2022a). Therefore, impacts to special status species would not occur, and this issue will not be further analyzed in the EIR.

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 U.S. Fish and Wildlife Service?

No Impact. Three sensitive habitats have been recorded in the CNDDB within the queried area (CDFW 2022). As discussed previously, the Project Site is developed with paved surfaces, buildings, and landscaped areas, with no native or naturalized vegetation communities present. No riparian or wetland features are present to support riparian habitat (USFWS 2022b). The Dominguez Channel is a concrete channel with no vegetation present. Therefore, impacts associated with riparian habitat or sensitive natural communities would not occur, and this issue will not be further analyzed in the EIR.

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?

Less Than Significant Impact. No wetlands or other jurisdiction waters are within the Project Site (USFWS 2022b). Water from rainfall flows across the impervious surfaces found on the Project Site and enters the municipal stormwater system. Potential indirect impacts during construction to the water in Dominguez Channel would be avoided by erosion-control measures that would be implemented as part of the Storm Water Pollution Prevention Plan (SWPPP) for the Project. Prior to the start of construction activities, the Contractor is required to file a Permit Registration Document (PRD) with the State Water Resources Control Board

(SWRCB) in order to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002) or the latest approved general permit. This permit is required for earthwork that results in the disturbance of one acre or more of total land area. The required SWPPP will mandate the implementation of best management practices (BMPs) to reduce or eliminate construction-related pollutants in the runoff, including sediment. Therefore, temporary indirect impacts would be less than significant due to compliance with regulations, and this issue will not be further analyzed in the EIR.

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?

Less Than Significant Impact. There are no on-site drainages or ponds that may serve as habitat for fish species. The Project Site is developed and surrounded by developed areas, and it does not reside within any designated wildlife corridors and/or habitat linkages identified in the South Coast Missing Linkages analysis project (South Coast Wildlands 2008) or California Essential Habitat Connectivity project (Spencer et al. 2010), so the Project would not affect the movement of any native resident or land-based wildlife species, nor would it affect established native resident or migratory wildlife corridors.

Ornamental vegetation located on the Project Site could provide suitable nesting habitat for some urban-adapted bird species. All development activities are subject to the requirement to protect nesting birds, in compliance with the Migratory Bird Treaty Act and sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibits the accidental or "incidental" taking or killing of migratory birds. The Project would be required to comply with the Migratory Bird Treaty Act and sections 3503, 3503.5, and 3513 of the California Fish and Game Code by preventing the disturbance of nesting birds during Project construction activities. This would generally involve clearing the Project Site of all vegetation outside the nesting season (from September 1 through January 31) or if construction would commence within the nesting season (which generally runs from February 1 through August 31 and as early as February 1 for raptors), conducting a pre-construction nesting bird survey to determine the presence of nesting birds or active nests at the Project Site. Any active nests and nesting birds must be protected from disturbance by construction activities through buffers between nest sites and construction activities. The buffer areas may be removed only after the birds have fledged. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. Any development activities conducted pursuant to the Specific Plan would be required to comply with all applicable requirements set forth by the City, including the City's street tree regulations. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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 located in a highly urbanized area, and there is no adopted Habitat Conservation Plan or Natural Community Conservation Plan for the site or the surrounding area (CDFW 2019). No conflict with a Habitat Conservation Plan or Natural Community Conservation Plan would occur with the Project. Therefore, impacts associated with biological resources would not occur, and this issue will not be further analyzed in the EIR.

2.5 Cultural Resources

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

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

Potentially Significant Impact. Preparation of the EIR will involve conducting a cultural resources records search of the Project Site, as well as a pedestrian survey. These investigations will identify the likelihood of the Project Site to support historical resources. The EIR will summarize the findings of these investigations and will describe whether the Project could have an adverse effect in the category of historical resources. As such, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. The Project Site is located within an urbanized area and has been subject to disturbance in the past, including disturbance associated with cleanup actions in the area covered under the DTSC cleanup order. Public Resources Code Section 21083.2(g) generally defines a unique archaeological resource as an artifact, object, or site

that meets a number of criteria, including an ability to provide information needed to answer important scientific questions that have public interest; having a special and particular quality, such as being the oldest of its type; or, being directly associated with a scientifically recognized important prehistoric or historic event or person.

Any archaeological resources on the Project Site have likely been previously disturbed. Furthermore, the remediation process that would be conducted prior to Project implementation would include excavation of soil below the ground surface over a portion of the Project Site. However, Project construction would involve excavation within the Project Site below ground surface in other areas of the Project Site. In the event that resources are buried at deeper depths than have been previously disturbed, the Proposed Project would have the potential to result in the inadvertent discovery of buried, previously unknown archaeological resources. In the event that previously unknown, buried resources were to be encountered during construction, significant impacts could result if the resource(s) are not identified and avoided or properly treated. The EIR will therefore discuss the potential for such resources to be impacted by the Proposed Project and will identify mitigation measures to reduce impacts of the Proposed Project on any archeological resources that may be present. As such, this issue will be further analyzed in the EIR.

c) ***Would the project disturb any human remains, including those interred outside of formal cemeteries?***

Potentially Significant Impact. As previously discussed, the Project Site is located within an urbanized area and has been subject to disturbance in the past. The Project Site is not part of a formal cemetery, and therefore, it is unlikely that human remains exist on or in the vicinity of the Project Site. While unlikely, there is some chance that previously undiscovered human remains could be located within the Project Site and could be disturbed by construction activities. Therefore, this issue will be further analyzed in the EIR, and will be discussed in both the cultural resources section and in the tribal cultural resources section of the EIR.

2.6 Energy

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

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?

Potentially Significant Impact. As described in Section 1.2.4, electricity in the City is supplied by Southern California Edison, and natural gas is supplied by Southern California Gas Company. Construction of the Proposed Project would require the use of energy in the form of fossil fuels (for construction equipment, worker vehicles, and truck trips) and electricity (for construction site lighting, computer equipment, and temporary construction trailers, if needed). Operation of the Proposed Project would require electricity for building operation (appliances, lighting, etc.) and fossil fuels related to vehicular transportation to and from the Project Site. Project operation would also result in indirect energy consumption related to the supply, distribution, and treatment of water, wastewater, and solid waste. The Project would be designed to comply with the California Green Building Standards Code. While the Project would comply with regulatory requirements for energy efficiency, the EIR will include additional analysis on this topic. The EIR will show the anticipated energy consumption that would result from Project construction and operation. The Project's energy consumption will then be compared to existing regional demands, and sustainability measures will be discussed in further detail. This analysis will establish whether the Project's energy use is considered wasteful, inefficient, or unnecessary. As such, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. There are a variety of state and local plans and policies in place that promote use of renewable energy and energy efficiency. Examples include the state's Renewable Portfolio Standard and the California Building Energy Efficiency Standards. The Renewable Portfolio Standard initially required retail sellers of electric services to increase procurement from eligible renewable energy resources to 20% of total retail sales by 2017. In 2015, Senate Bill 350 mandated a 50% Renewable Portfolio Standard by 2030. In 2018, Senate Bill 100 increased the Renewable Portfolio Standard to 60% by 2030 and requires all of the state's electricity to come from carbon-free resources by 2045. In accordance with Senate Bill 100, the City's electricity supplier (Southern California Edison) is required to procure at least 60% of its energy portfolio from renewable sources by 2030.

The California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6) was adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality.

The Proposed Project has been designed, and would be constructed, to incorporate sustainable building features and construction protocols required by state and local regulations and plans, including CALGreen and the City of Gardena Climate Action Plan. The Proposed Project is required to be consistent with existing regulations and, therefore, is not anticipated to conflict with renewable energy or energy efficiency plans. However, the EIR will include a more robust discussion of applicable plans and policies and will provide a consistency analysis for the Proposed Project, to ensure that the Project would comply with such plans policies. Therefore, this issue will be further analyzed in the EIR.

2.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☒	☐	☐	☐
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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐

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.***

Potentially Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act, California Public Resources Code sections 2621 et seq., regulates development near active faults to reduce hazards associated with surface fault rupture. The Act prohibits most structures for human occupancy from being built across the trace of active faults and establishes special study zones called Alquist-Priolo Zones, which extend 500 feet from the fault. These zones are delineated and defined by the state geologist and identify areas where potential surface rupture along a fault could prove hazardous. The Project Site is not mapped within an Alquist-Priolo Earthquake Fault Zone, indicating that earthquake faults are not known to cross these properties (CGS 2022). However, the boundary of the nearest Alquist-Priolo Earthquake Fault Zone, associated with the Avalon-Compton Fault, is located approximately 3.8 miles east of the Project Site (CGS 2022) and southern California is an area of high seismic activity in

general. Construction and operation of the Project would not increase or exacerbate the potential for fault rupture to occur and therefore would not directly or indirectly cause potential substantial adverse effects involving fault rupture. Nevertheless, due to the proximity of the Project Site to an Alquist-Priolo Earthquake Fault Zone and its location in a generally seismically active area, this issue will be further discussed in the EIR. Specifically, data gathering for the EIR will include a geotechnical investigation and associated report(s) that will further evaluate and discuss the potential for fault rupture at the Project Site. The EIR analysis will then incorporate and summarize the findings of the geotechnical investigation and will come to a conclusion regarding fault rupture hazards.

ii) Strong seismic ground shaking?

Potentially Significant Impact. The Project Site is located within an area that could be subject to seismic ground shaking from a variety of fault lines throughout the region. A number of faults in the region are considered active features capable of generating future earthquakes that could result in moderate to strong ground shaking at the Project Site. Although the Proposed Project could be subject to severe seismic shaking, construction and operation of the Project would not increase or exacerbate the potential for earthquakes to occur and therefore would not directly or indirectly cause potential substantial adverse effects involving seismically induced ground shaking. Nevertheless, due to the Project's location in a seismically active region, this issue will be further discussed in the EIR. Specifically, data gathering for the EIR will include a geotechnical investigation and associated report(s) that will further evaluate and discuss potential seismic ground shaking at the Project Site. The EIR analysis will then incorporate and summarize the findings of the geotechnical investigation and will come to a conclusion regarding seismic ground shaking hazards.

iii) Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. Liquefaction is the process in which saturated silty to cohesionless soils below the groundwater table temporarily lose strength during strong ground shaking as a consequence of increased pore pressure during conditions such as those caused by an earthquake. Earthquake waves cause water pressure to increase in the sediment and sand grains lose contact with each other, leading the sediment to lose strength and behave like a liquid. The majority of the Project Site is located within a liquefaction zone (CGS 2022) and this issue will be further discussed in the EIR. Specifically, data gathering for the EIR will include a geotechnical investigation and associated report(s) that will further evaluate and discuss potential liquefaction at the Project Site. The EIR analysis will then incorporate and summarize the findings of the geotechnical investigation and will come to a conclusion regarding liquefaction hazards.

iv) Landslides?

No Impact. The Project Site is not located within an area identified as being susceptible to earthquake-induced landslides on maps prepared by the state (CGS 2022). There are no known landslides near the Project Site. The property is generally flat and is surrounded on all sides by generally flat and developed land. As such, landslides are unlikely to occur on the Project Site and the Proposed Project is not expected to increase or exacerbate the potential

for landslides to occur. As such, the Proposed Project would not expose people or structures to adverse risks associated with landslides. No impacts would occur, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. In an urbanized setting, substantial erosion or loss of topsoil typically occurs when ground disturbance causes soils to be exposed, and the soils are washed away during a storm or wind event. Surface structures, such as paved roads and buildings, decrease the potential for erosion. Once covered, soil is no longer exposed to wind or water erosion.

The Proposed Project would cause ground disturbance during construction activities, which can lead to erosion, particularly during a rain event or wind event. However, the construction contractor would be required to comply with the Construction General Permit. The Construction General Permit requires preparation and compliance with a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must include erosion control measures such as covering exposed soil stockpiles and working slopes, lining the perimeter of the construction site with sediment barriers, and protecting storm drain inlets. Preparation and implementation of the required SWPPP would reduce construction-related erosion to the extent practicable. During operation, the Project Site would be covered with buildings, hardscape, and landscaping, which would preclude erosion during operation. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

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?

Potentially Significant Impact. As indicated above, the majority of the Project Site is located within a state-mapped liquefaction hazard zone and in a seismically active area. The EIR will include a detailed geotechnical report that will characterize any potential hazards in the area and that will present design requirements for the Project. As such, this issue will be further evaluated in the EIR.

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?

Potentially Significant Impact. Expansive soils are generally clays, which increase in volume when saturated and shrink when dried. The Project Site was historically used for clay mining so it is likely that clay soils are present onsite. The Proposed Project would be required to comply with California Building Code requirements related to hazards involving potentially expansive soils. Further analysis of the on-site soils will be presented in the EIR based on site-specific geologic reports that will characterize on-site soils. Therefore, this issue will be further analyzed in the EIR.

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. The Project Site is served by the existing municipal sewer system. The City has established utility services, and no septic systems are either proposed or required to serve the Project. Therefore, no impacts would occur, and this issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. As previously discussed, the Project Site is located within an urbanized area and has been subject to disturbance in the past. However, grading, excavation, or other construction activities resulting from implementation of the Proposed Project could potentially disturb undiscovered paleontological resources or unique geologic features, in the event that any are present. The EIR will present the findings of a paleontological resources records search and will identify the potential for the Project to adversely affect such resources. Therefore, this issue will be further analyzed in the EIR.

2.8 Greenhouse Gas Emissions

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

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

Potentially Significant Impact. The Proposed Project would result in emissions of greenhouse gases (GHGs) during construction and operation. Temporary GHG emissions would result from construction vehicles and equipment. Additionally, during operation, GHG emissions would result from vehicle trips generated by the Proposed Project, as well as building energy and water usage. The Project would be subject to a variety of plans and

policies that are place for the reduction of GHG emissions at the state and local level. Such plans and policies include the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the City of Gardena Climate Action Plan. Further analysis is required to determine the estimated Project-generated GHG emissions, their impact on global climate change, and the Project's compliance with applicable plans and policies for GHG reductions. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. As stated above, there are a variety of plans, policies, and regulations in place for the purpose of reducing GHG emissions. At the state level, the California Air Resources Board (CARB) Scoping Plan provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. Under the Scoping Plan, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage) and changes to the vehicle fleet and associated fuels, among others. Another state regulatory action, Executive Order S-3-05, establishes a goal to reduce statewide GHG emissions to the 1990 level by 2020, and to reduce statewide GHG emissions to 80% below the 1990 level by 2050. At the regional level, the SCAG RTP/SCS sets forth strategies to reduce vehicle miles traveled, to increase use of alternative fuel vehicles, and to improve energy efficiency. At the local level, the City adopted the City of Gardena Climate Action Plan in 2017 which "identifies community-wide strategies to lower GHG emissions from a range of sources within the jurisdiction, including transportation, land use, energy generation and consumption, water, and waste" (Gardena 2017). The EIR will evaluate the Project's consistency with applicable state, regional, and local plans, policies, and regulations that have been adopted for the purpose of reducing GHGs. Therefore, this issue will be further analyzed in the EIR.

2.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 that 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, would the project 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?	☐	☐	☒	☐

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

Potentially Significant Impact. Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be used

during construction at the Project Site and would be transported to the Project Site during construction. While some hazardous materials used during construction may require disposal, such disposal activities would only occur for the duration of construction and would not be considered routine. All potentially hazardous materials used during construction would be transported, used, and disposed in accordance with manufacturer's specifications and instructions, thereby reducing the risk of hazardous materials use. Additionally, any such materials would be transported, used, disposed, and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. These existing laws regulate quantities of hazardous materials, promote accident prevention, establish protections from exposure, and regulate storage and disposal. Consequently, use of these materials for their intended purposes during construction would not pose a significant risk to the public or environment.

During operation, hazardous materials that could be routinely used during operation of the Proposed Project include chemical reagents, cleaning solvents, fuels, paints, cleansers, pesticides, fertilizers, oils, and miscellaneous organics and inorganics that are used as part of typical building maintenance. Such materials would be used in small quantities, and their use on the Project Site would be consistent with use of similar hazardous materials occurring at other nearby office and commercial uses. As with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with the manufacturer's specifications and all applicable federal, state, and local requirements. Such materials are not considered to be acutely hazardous when properly used, stored, transported, and disposed. Due to the type of development (industrial/distribution, office/retail and self-storage), operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site. Upon compliance with applicable regulations governing the transport, use, and disposal of hazardous materials, significant impacts would not be anticipated to occur.

The Project would incorporate a long term, and ongoing Remedial Action Plan (RAP)_that is presently anticipated to involve soil vapor barrier and ventilation systems for the Project's building, land use controls and potentially other elements to prevent any unreasonable risk to human health or the environment from the constituents of concern that will be left in placed but capped under ARC's RAP that DTSC has approved in implementing the Remedial Action Order from DTSC (Case # 19490135). Details of the long term and ongoing remediation system are not yet available, and as such, there is the potential for the Project to result in an exposure of hazards. Therefore, this issue will be further analyzed in the EIR.

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?

Potentially Significant Impact. Prior to Project construction, a portion of the Project Site would be remediated for contamination as part of the DTSC-approved RAP that ARC will implement under a Remedial Action Order from DTSC (Case # 19490135). The Applicant would take steps to develop the Project consistent with and not impair this remedial remedy by seeking approval of a RAP that would include soil vapor barrier and ventilation systems under the Project's building, land use controls, and potentially other elements to prevent any unreasonable risk to human

health or the environment from the constituents of concern that will be left in placed but capped under ARC's RAP. The soils on the Project Site are known to be contaminated with a variety of hazardous constituents associated with three oil sludge sumps, including volatile fuel hydrocarbons (VFHs), total extractable hydrocarbons (TEHs), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polynuclear aromatic hydrocarbons (PAHs), Title 22 metals, mercury and hexavalent chromium (Geosyntec 2021). Due to the history of contamination at the Project Site, more details will be provided in the EIR with regards to potential hazardous materials releases. The EIR will include an evaluation of former hazardous materials releases at the Project Site, including contamination associated with the former uses, as well as records search results for other potential issues such as underground storage tanks and potential contamination in the vicinity of the Project Site.

Project construction would involve the use and storage of commonly used hazardous materials such as gasoline, diesel fuel, lubricating oil, grease, solvents, and other vehicle and equipment maintenance fluids. These substances would be used and stored in designated construction staging areas. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Compliance with applicable regulations would minimize the potential for upset and accident conditions involving the release of potentially hazardous construction materials and chemicals into the environment.

Project operation could involve use of chemical reagents, cleaning solvents, fuels, paints, cleansers, pesticides, fertilizers, oils, and miscellaneous organics and inorganics that are used as part of typical office building maintenance. Upon compliance with applicable regulations governing the transport, use, and disposal of hazardous materials, significant impacts would not be anticipated to occur. Nevertheless, the EIR will include more details and analysis of the potential for Project operation to result in release of hazardous materials into the environment. Therefore, this issue will be further analyzed in the EIR.

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?

Potentially Significant Impact. The closest school to the Project Site is the Gardena Early Education Center, located at 1350 West 177th Street, approximately 0.1 mile southeast of the Project Site. Gardena High School is also located immediately south of the Gardena Early Education Center at 1301 West 182nd Street. Because the Project Site is being remediated under oversight of DTSC prior to construction of the Proposed Project, as discussed in (b) and (d), and because the Project would include a long term and ongoing remediation system, as discussed in (a) above, the EIR will include more details and analysis of the potential for Project construction and operation to emit hazardous materials within one-quarter mile of a school. Therefore, this issue will be further analyzed in the EIR.

d) Would the project be located on a site that 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?

Potentially Significant Impact. Government Code, Section 65962.5, combines several regulatory lists of sites that may pose a hazard related to hazardous materials or substances. As described in Section 1.2.1 above, the majority of the Project Site is located on an active DTSC Mandatory Cleanup Site (Case # 19490135). Prior to the commencement of the Proposed Project, it is anticipated that the Project Site would be remediated per DTSC requirements as described in the ARC RAP that DTSC approved, as discussed above, and that use of these properties would not pose a significant hazard to the public or to the environment. However, because these properties are located on an identified cleanup site, and because the cleanup process is ongoing, this issue will be further analyzed in the EIR.

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 nearest public airports to the Project Site are the Compton/Woodley Airport and the Hawthorne Municipal Airport, located approximately 3.1 miles northeast and 3.7 miles northwest of the Project Site, respectively. The Los Angeles International Airport is also located approximately 6.5 miles northwest of the Project Site. According to the Los Angeles County Airport Land Use Commission, the Project Site is located outside of the airport land use plan (Los Angeles County Airport Land Use Commission 2014). As such, the Project Site is not within two miles of a public airport, and the Project Site is not located within an airport land use plan. Therefore, the Proposed Project would not create an airplane safety hazard for people residing or working in the Project area. No impact would occur, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The City has developed an Emergency Operations Plan (EOP) to facilitate emergency management. The EOP addresses the planned response to extraordinary emergency situations associated with natural disasters, technological incidents and national security emergencies. It establishes emergency organizations, assigns tasks, specifies policies and procedures and is designed to include the City in the California Standardized Emergency Management System (SEMS) (City of Garden 2006a). The City's police department also administers the Gardena Community Emergency Response Training (CERT) program, which trains residents to assist safety personnel and City staff in the event of a major disaster (Gardena Police Department 2022).

The construction and operation of the Proposed Project is not anticipated to interfere with emergency preparedness initiatives or with responses to an emergency. Furthermore, the Proposed Project's design and operations would be required to adhere to applicable aspects of the EOP. As such, the Proposed Project would not obstruct or interfere with implementation of the City's EOP. Rather, the plans would proceed in a similar manner with or without the Project.

The City's disaster route map identifies Artesia Boulevard as a disaster route (LADPW 2008). The Proposed Project may include minor traffic improvements, on Artesia Boulevard. The traffic improvements could obstruct and/or slow traffic on Artesia Boulevard during construction, potentially impeding evacuation. However, construction impacts would be temporary in nature and would be controlled via standard construction best management practices, which include construction traffic control measures. Furthermore, construction of the roadway improvements is not likely to require extensive ground disturbance that would substantially reduce the capacity of the roadway for evacuation purposes. In the event of an evacuation, it is likely that construction of the traffic improvements would cease. As such, Project construction is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

During operations, the Project would increase the number of people present on the Project Site relative to existing conditions. The Project would therefore result in an incremental increase in the number of people who would need to evacuate and/or receive emergency services, particularly during business hours. However, as explained in Section 2.14, the employment growth associated with the Project would fall well within projections for the City, is not substantial, and has been accounted for in local and regional planning efforts. As such, the additional employees associated with the Project would not substantially alter the proceedings of the City's emergency response plan or evacuation plan.

Furthermore, the Proposed Project would not introduce any physical obstructions or impairments to emergency response or evacuation. The Los Angeles County Fire Department would review the Proposed Project plans to ensure adequate emergency access in and around the site as part of the building plan check process. The plans would be adjusted in the event that the fire department identifies any deficiencies in access that could preclude emergency evacuation or emergency response. In the event of a disaster during Project construction or operation, the City's emergency plans would proceed in a similar fashion with or without the Proposed Project. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The Project Site is not within a Very High Fire Hazard Severity Zone (VHFHSZ). At its closest point, the nearest VHFHSZ is located approximately 6 miles southwest of the Project Site within the cities of Palos Verdes Estates and Rolling Hills Estates (CAL FIRE 2022a). As such, the Project Site is not within a VHFHSZ and is separated from the VHFHSZ by freeways, major roadways and miles of urban and suburban development. In the unlikely event of a fire emergency at the Project Site due to wildland fires, the Los Angeles County Fire Department (specifically Fire Station No. 158, located 0.8 miles north of the Project Site), would provide fire protection services. Due to the urbanized nature of the area and the provision of nearby firefighting protection services, implementation of the Proposed Project is not anticipated to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

2.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water 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; or	☒	☐	☐	☐
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?	☒	☐	☐	☐

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

Surface Water Quality

Less Than Significant Impact. Short-term construction activities for the Proposed Project would have some potential to affect the quality of stormwater discharged from the Project Site. Land disturbance activities could result in erosion and sedimentation (particularly during a rain event). Because on-site soils have the potential to be contaminated, soils that are carried off site during a storm could introduce pollutants to the runoff. Spills or leaks of petroleum products used by construction equipment could also affect the quality of stormwater. Such discharges would have the potential to violate water quality standards or waste discharge requirements, resulting in a potentially significant impact. However, the construction contractor would be required to comply with a number of regulatory requirements that would minimize the potential for water pollutants to exit the construction disturbance areas. One such requirement is the Construction General Permit, which requires preparation and compliance with a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must include erosion control measures such as covering exposed soil stockpiles and working slopes, lining the perimeter of the construction site with sediment barriers, and protecting storm drain inlets. Additionally, the construction contractor would be required to implement a Soil Management Plan that has been reviewed and approved by the California Department of Toxic Substances Control (DTSC). This plan would include measures that would prevent soils from leaving the Project Site as part of stormwater runoff. In addition to implementation of the SWPPP and the Soil Management Plan, standard site management practices and typical equipment maintenance would generally preclude leaks and spills of a magnitude that would adversely affect stormwater runoff. As such, potential water contaminants would be confined to the construction disturbance areas to the extent practicable, thereby minimizing potential adverse effects to surface water quality.

The majority of the Project Site is currently paved or covered with a geosynthetic material. However, after construction, the Project Site would be covered with buildings, hardscape, and landscape, and the percentage of the Project Site that is impervious would increase. Increased imperviousness has the potential to increase stormwater runoff volumes. The majority of the Project Site is currently vacant and fenced off from access. Stormwater runoff from urban development also has the potential to carry pollutants associated with the development, such as trash, spilled or leaked chemicals (e.g., cleaning products) and gasoline leaks from vehicles. As such, development of the Project Site has the potential to increase runoff volumes and/or runoff pollutants, such that water quality standards could be violated, resulting in a potentially significant impact. The City is a co-permittee under the "Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles" issued by the Los Angeles Regional Water Quality Control Board, which also serves as the Federal Clean Water Act National Pollutant Discharge Elimination System (NPDES) Permit and the Waste Discharge Requirements (WDRs) under the California Municipal NPDES Permit. As a new development, design and operation of the Proposed Project would be subject to the requirements of the City's Storm Water Management and Discharge Control Ordinance, including Low Impact Development (LID) structural and

nonstructural Best Management Practices (BMPs) and source control BMPs. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Groundwater Quality

Potentially Significant Impact. Groundwater is located as shallow as 15 feet below ground surface (bgs) at the Project Site (Geosyntec 2021). The site is primarily a fill site with limited excavation. However, during construction, the Project Site would be excavated to a depth of approximately 12 feet for utility trenching. As such, groundwater is not expected to be encountered during construction. The required SWPPP and standard site management practices, which would include spill prevention and cleanup guidelines, would protect groundwater from contamination by construction activities. The presence of an underground storage tank or the removal of an underground storage tank could also present a potential threat to groundwater quality during construction. While no underground storage tanks are expected to be present within the Project Site, in the unlikely event that they are found during excavation, potentially contaminated materials would be removed in accordance with all applicable federal, state, and local regulations. Therefore, underground storage tanks would not pose a significant hazard to groundwater quality.

During operations, groundwater quality would likely be protected, as the entire Project Site would be covered by the impervious structures and paving, preventing urban runoff pollutant intrusion into the groundwater system.

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?

Groundwater Use

Less Than Significant Impact. The Proposed Project would not include construction of any groundwater wells and, thus, would not directly use groundwater. The Proposed Project would increase water demand relative to existing conditions. Water would be used for dust control during construction, and operation of the Proposed Project would require water for landscaping irrigation and standard building operations. Water for construction and operation would be obtained from the municipal water service, which is provided by the Golden State Water Company. The water provided by Golden State Water Company is a blend of groundwater pumped from the West Coast and Central Groundwater Basins and imported water from the Colorado River Aqueduct and State Water Project through the Metropolitan Water District of Southern California (Golden State Water Company 2022). The Project Site is located within the West Coast Groundwater Basin, with the Bellflower Aquiclude directly beneath the site between 15 and 25 feet (Zone A, upper) and 75 and 80 feet (Zone B, lower) below ground surface (bgs). The Bellflower Aquiclude is not generally used for beneficial purposes due to low quality and low yield (Geosyntec 2021). Below the Bellflower Aquiclude are the Gardena and/or Gage Aquifers of the Lakewood Formation and the major underlying aquifers are the Lynwood and Silverado Aquifers of the San Pedro Formation. The Gardena/Gage, Silverado and Lynnwood Aquifers all constitute major sources of groundwater in the West Coast Groundwater Basin. However, the Gardena and Gage Aquifers are currently

not pumped for domestic use (Geosyntec 2021). Because none of the shallower groundwater underlying the site is currently pumped, development of the Proposed Project would not alter or affect planned groundwater pumping volumes. Plans for groundwater pumping and improvements are currently underway and would proceed with or without the Proposed Project. For these reasons, development of the Proposed Project would not substantially utilize groundwater supplies such that the Project would impede sustainable groundwater management. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Groundwater Recharge

Potentially Significant Impact. Under existing conditions, approximately 75 percent the Project Site is paved. The Proposed Project would increase the imperviousness of the Project Site to some degree. Developing an existing pervious area has the potential to interfere with groundwater recharge, as water can no longer percolate through the Project Site. Development of the Proposed Project would generally preclude percolation from occurring at the Project Site. As such, this topic will be further discussed in the EIR.

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. The Project Site does not contain any streams or rivers. As such, no streams or rivers would be altered by the Proposed Project. However, ground disturbance during construction would have the potential to result in erosion or siltation on or off site, as exposed soils could enter stormwater runoff, resulting in erosion and/or siltation in the Dominguez Channel, or could be eroded in a wind event. As discussed under Section 2.10(a), all construction activities would be required to comply with a SWPPP and a Soil Management Plan. Implementation of these required plans would protect exposed soils from erosion during construction. During operations, the amount of impervious surfaces and urban land uses on the Project Site would increase. As such, the rate and volume of urban stormwater runoff, which is directed to the Dominguez Channel, could increase from the site. However, the design and operation of the Project would be required to adhere to LID standards (as described under Section 2.10(a)), ensuring that the volume and rate of stormwater runoff from the Project Site would be minimized to the extent feasible. As such, the Proposed Project would not have the potential to result in substantial erosion or siltation on or off site. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

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. The Project Site does not contain any streams or rivers. As such, no streams or rivers would be altered by the Proposed Project. As discussed under Section 2.10(a), Proposed Project construction would be required to comply with a SWPPP. Implementation of the SWPPP would control runoff from the site during construction and

would minimize the potential for flooding to occur on or off site. During operations, the amount of impervious surfaces on the Project Site would increase. As such, the rate and volume of urban stormwater runoff could increase from the Project Site, which could lead to flooding on or off site. However, the design and operation of the Project would be required to adhere to LID standards (as described under Section 2.10(a)), ensuring that the rate and volume of runoff from the Project Site would be minimized to the extent feasible. Implementation of LID features would reduce the potential for the Project to cause flooding. Through compliance with the stormwater management requirements described above, the Proposed Project would not result in substantial flooding on or off site. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

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?

Potentially Significant Impact. Surface water at the Project Site generally flows north and east where it is intercepted by a flood control storm drain located in the northeast corner of the Project Site adjacent to the intersection of Artesia Boulevard and Normandie Avenue (Geosyntec 2021). From there, surface water flows to the Dominguez Channel.

During construction, implementation of the required SWPPP is expected to limit stormwater runoff volumes from the site, as well as potential construction-related runoff pollutants. Implementation of the SWPPP would generally preclude stormwater contaminants (e.g., soils or spilled chemicals) from exiting the construction area. During operations, the Project would be designed and operated in compliance with LID requirements. Compliance with LID requirements would reduce stormwater runoff volumes and runoff rates. Compliance with LID requirements would also reduce stormwater pollutants and/or prevent pollutants from entering the stormwater drainage system. Required compliance with a SWPPP and LID provisions is expected to ensure that the Proposed Project would not result in exceedances of the stormwater drainage system or result in substantial additional sources of polluted runoff. However, as part of Project planning and design, a stormwater infrastructure capacity study will be conducted, and the findings will be presented in the EIR. As such, discussion of this topic as it relates to the capacity of existing utilities will be provided in the EIR.

iv) Impede or redirect flood flows?

No Impact. The Project Site does not contain any streams or rivers having the potential to be altered by the Proposed Project. The Project Site is located within a highly urban area and is located outside of the 100-year and 500-year flood hazard zones (DWR 2022). As such, the Proposed Project would not impede or redirect flood flows. Therefore, no impacts associated with impeding or redirecting flood flows would occur. This issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. As stated in Section 2.10(c)(iv), the Project Site is not located in the 100-year or 500-year floodplain (DWR 2022). As such, hazards related to flooding would not be expected. Tsunamis are large ocean waves caused by the sudden water displacement that results from an underwater earthquake, landslide, or volcanic eruption. Tsunamis affect low-lying areas along the coastline. The Project Site is located approximately 6.25 miles east of the Pacific Ocean and inland enough that it would not be affected by a potential tsunami. Seiches affect enclosed or semi-enclosed bodies of water such as bays, lakes, and harbors. The Proposed Project is not in the vicinity of such a water body. As such, the Project area would not be susceptible to inundation by tsunami or seiche. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

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

Potentially Significant Impact. Water quality control plans are designed to preserve and enhance water quality and protect the beneficial uses of all downstream water bodies. The federal Clean Water Act requires states to adopt water quality standards for water bodies. Water quality standards consist of designated beneficial uses for a particular water body, along with water quality criteria necessary to support those uses. Water quality criteria are set concentrations or levels of constituents. When designated beneficial uses of a particular water body are being compromised by water pollution, Section 303(d) of the Clean Water Act requires identifying and listing that water body as "impaired." Once a water body has been deemed impaired, a total maximum daily load (TMDL) must be developed for each impairing water quality constituent. Water quality for all surface water and groundwater within the greater Los Angeles area is regulated under the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). Water quality standards for all waters in the region are discussed in the region's Basin Plan.

The Project Site is immediately adjacent to the Dominguez Channel of the Dominguez Channel Watershed, which is regulated under the Dominguez Channel and Greater Los Angeles and Long Beach Waters Toxic Pollutants TMDL. As described above, the Proposed Project would generate water quality pollutants typical of commercial and industrial uses. Such pollutants would include sediments, trash and debris, spilled or leaked chemicals, nutrients, pesticides, oil, grease, and metals. Compliance with the City's Stormwater Management Program and implementation of construction BMPs would minimize the potential for such pollutants to exit the Project Site as runoff contaminants. Upon compliance with applicable requirements, the Proposed Project would not be expected to conflict with plans and policies for the protection of the Dominguez Channel Watershed.

Other water quality control plans pertaining to the Project also include LID requirements. As previously discussed under Section 2.10(a), the Proposed Project would comply with LID requirements and would also be required to comply with other applicable municipal code requirements pertaining to water quality. As a result, the Proposed Project is not expected to conflict with or obstruct implementation of a water quality control plan.

A sustainable groundwater management plan, also known as a groundwater sustainability plan, demonstrates management and use of groundwater in a manner that can be maintained during a planning and implementation horizon without causing undesirable results. Water to be consumed by the Project would be provided by the City, which includes groundwater pumped from the West Coast and Central Groundwater Basins and imported water from the Colorado River Aqueduct and State Water Project. California's Department of Water Resources has designated the West Coast and Central Basins as having very low priority regarding enacting a Groundwater Sustainability Plan (CDWR 2022). However, this does not preclude a Groundwater Sustainability Plan from being developed. In the event that a Groundwater Sustainability Plan were to be prepared for the West Coast or Central Groundwater Basins, the City would be subject to compliance with the plan(s). Groundwater pumping would be limited by the capacity of the groundwater wells, and not by water demand. Based on these limitations and continued groundwater monitoring, implementation of the Project would not substantially deplete groundwater supplies such that sustainable management of the groundwater basins would be impeded. Furthermore, the Proposed Project would not change the groundwater pumping plans of the City. However, as described in Section 2.10(b), the Proposed Project would increase the imperviousness of the Project Site. This issue will be further discussed in the EIR as it relates to groundwater recharge. As such, while the Proposed Project is not expected to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, this topic will be further discussed in the EIR, particularly in relation to groundwater recharge.

2.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
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?	☒	☐	☐	☐

a) Would the project physically divide an established community?

Less Than Significant Impact. The Project Site is bound by an existing, major roadway (Artesia Boulevard) to the north, a rail line and major roadway (Normandie Avenue) to the east and the Dominguez Channel to the south. A large portion of the Project Site is vacant and fenced off from access. The Project Site contains one residential property along the southern

side, adjacent to the Dominguez Channel which is currently accessible only by an unnamed alleyway running along the western edge of the Project Site. Under existing conditions, this residence is highly isolated due to its location. The Proposed Project would not further isolate this residence should it remain after construction of the Proposed Project. As such, this property does not represent physical connections within an established community. Furthermore, the Proposed Project does not include features such as a new highway, new aboveground infrastructure, or an easement through an established neighborhood, which are features that may result in physical divisions within a community. For these reasons, the Proposed Project's impacts would be less than significant. This issue will not be further analyzed in the EIR.

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?

Potentially Significant Impact. The City has numerous land use policies and regulations that have been adopted to avoid or mitigate environmental effects. As described throughout this Initial Study, the Proposed Project may result in potentially significant environmental impacts, depending on the results of more detailed technical analyses that will be presented in the Project's EIR. As such, the analyses in the EIR will demonstrate whether the Project may potentially conflict with land use plans, policies, or regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, further analysis of this issue will be provided in the EIR.

2.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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 Division of Mines and Geology (renamed the California Geological Survey in 2006) has mapped the Project Site as Mineral Resources Zone 1 for aggregate resources. Mineral Resource Zone 1 is a designation given to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence (Division of Mines and Geology 1979). The State Division of Mines and Geology has not designated any land within the City as state classified mineral resource deposit areas and no areas are designated for mineral extraction in the City's General Plan (City of Gardena 2006b).

According to the California Geologic Energy Management Division (CalGEM), there are no oil, gas, geothermal, or other known wells located on the Project Site and the Project Site is not within a known oil or gas field. The nearest well is an idle well approximately 0.1 mile southeast of the Project Site across the Dominguez Channel (CalGEM 2022). As such, development of the Proposed Project would not interfere with any existing or previous oil drilling activities within the Project Site. Furthermore, the Project Site is located adjacent to residential and commercial uses. Due to these surrounding land uses, future development of oil drilling at the Project Site is not expected to be practicable. As such, the Project Site does not currently support mineral extraction activities, nor would it be expected to support such activities in the future. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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. There are no areas are designated for mineral extraction in the City's General Plan (City of Gardena 2006b). As such, the City has not delineated a specific mineral resource recovery site on the Project Site, and the Project would not result in the loss of availability of a locally important mineral resource recovery site. No impact would occur, and this issue will not be further analyzed in the EIR.

2.13 Noise

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
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?	☐	☐	☐	☒

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?

Potentially Significant Impact. Implementation of the Proposed Project would result in two primary types of potential noise impacts: short-term (i.e., temporary) noise during construction and long-term noise during operation. There are sensitive receptors (residences) located immediately to the west and south of the Project Site. These land uses could be impacted by noise from Project construction and operation. The EIR will quantify the anticipated noise increases that could be associated with Proposed Project construction and operation and will evaluate potential impacts to nearby sensitive receptors utilizing methodology and established noise level requirements within the Gardena Municipal Code noise regulations and within the City's Noise Plan of the General Plan Community Safety Element. As such, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. Operation of certain types of construction equipment can cause vibrations that spread through the ground and diminish in strength with distance. There are a variety of vibration-sensitive receptors within the vicinity of the Project Site, including residential uses immediately adjacent to the Project Site. The EIR will quantify the anticipated vibration that could be produced by the Project and will evaluate potential impacts to nearby sensitive receptors, including any potential historic resources that could adversely be affected by construction vibration. As such, this issue will be further analyzed in the EIR.

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 nearest public airports to the Project Site are the Compton/Woodley Airport and the Hawthorne Municipal Airport, located approximately 3.1 miles northeast and 3.7 miles northwest of the Project Site, respectively. The Los Angeles International Airport is also located approximately 6.5 miles northwest of the Project Site. According to the Los Angeles County Airport Land Use Commission, the Project Site is located outside of the airport land use plan (Los Angeles County Airport Land Use Commission 2014). As such, the Project Site is not located within 2 miles of a public airport or within an airport land use plan. Additionally, the Project Site is not located within the vicinity of a private airstrip. Therefore, the Proposed Project would not expose people residing or working in the Project area to excessive noise levels related to aircraft use. No impacts would occur, and this issue will not be further analyzed in the EIR.

2.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

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 Than Significant Impact. The Proposed Project would not involve development of residences and would not, therefore, have the potential to result in direct population growth by expanding the residential population of the City. Additionally, the Proposed Project would not develop new infrastructure, such as the extension of roads or utility services, that could encourage or facilitate population growth. Rather, the Proposed Project would involve developing a single structure and associated parking for industrial/distribution, office/retail and self-storage uses. As such, the Proposed Project would lead to an increase in employment opportunities within the City. Based on the square footage of different uses that would be developed, the Project Site is expected to support approximately 40 employees. This figure is based on conversations with the Applicant, who has developed numerous self-storage facilities, and the Applicant's discussions with potential lessees of the commercial and industrial properties. The employment growth associated with the Proposed Project is analyzed further below.

Employment Growth

The Demographics and Growth Forecast technical report in SCAG's 2020–2045 RTP/SCS shows population, housing, and employment growth projections for the City. According to this report, the City had 29,300 jobs in 2016 and is expected to accommodate 32,100 jobs by 2045 (SCAG 2020), an increase of approximately 2,800 jobs. The Proposed Project is expected to be operational around October 2025. Assuming that the City keeps pace with SCAG's growth projections and that growth is evenly divided across the planning horizon (approximately 96.5 jobs per year), the City is expected to experience an increase of approximately 193 jobs between the time of this writing (2022) and the time of Project buildout (2024). The employment provided by the Proposed Project upon Project buildout would fall within these projections. Assuming that the Proposed Project would accommodate new businesses in the City (as opposed to businesses that relocate from elsewhere in the City), the Project is expected to create approximately 40 new jobs in the City. This growth equates to approximately 1.4% of the total employment growth that is projected to occur between 2020 and 2045 and approximately 21% of the growth that is expected to occur between the time of this writing (2022) and the Project's anticipated buildout year (2024). As

such, employment growth associated with the Proposed Project would fall within the previous and current growth projections for the City. This indicates that the Proposed Project would not outpace regional infrastructure, since the SCAG RTP/SCS is used for local and regional planning purposes.

Proposed Project construction would also temporarily increase employment in the City. However, given the relatively common nature of the proposed construction activities, the demand for construction employment would likely be met within the existing and future labor market in the City and in the surrounding metropolitan area. If construction workers live outside of the City, these workers would likely commute during the temporary construction period.

Residential Growth

Because the Proposed Project would be located in a developed area within Los Angeles County that has close access to major freeways, it is anticipated that jobs created by the Proposed Project would be filled by existing City residents or by residents of neighboring cities. In the event that some of the new employees relocate to the City upon obtaining a job at the Project Site, this would result in minor to negligible population growth. Even in the unlikely event that all new employees moved to the City along with an average-sized household, the resulting residential population growth would fall well within population growth projections for the City. The average household size in the City is 2.9 people per household (SCAG 2020). As such, one household each for 40 employees would equate to a total population growth of 116 people. According to SCAG's 2020–2045 RTP/SCS, the City had a population of 60,600 people in 2016 and will grow to 65,700 in 2045, an increase of 5,100 people (SCAG 2020). As such, in the unlikely event that all Project employees and their households relocated to the City, the resulting population growth of 116 people would fall well within population growth projections for the City.

In conclusion, the Project would result in employment growth within the City. However, this employment growth would fall within job growth projections for the City and would not be expected to lead to substantial population growth. For these reasons, impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

Less than Significant Impact. The Proposed Project site currently contains one residential property. No households will be displaced. The City recently adopted its 6th Cycle Housing Element which has been approved by the California Department of Housing and Community Development. Additionally, the City has undertaken a Land Use Update and Rezoning Program which increased new housing development opportunities within the City in accordance with the Housing Element and will address the City's housing needs as identified by SCAG's Regional Housing Needs Assessment (RHNA). For these reasons, impacts would be less than significant. This issue will not be further analyzed in the EIR.

2.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
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?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

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, rescue services, and emergency medical (paramedic) services in the City are provided by the Los Angeles County Fire Department (LACoFD). The closest fire station to the Project Site is Fire Station No. 158, located 0.8 miles north of the Project Site. As discussed in Section 3.14, Population and Housing, the Project would not include housing that would result in a direct increase in the City's population to be served by LACoFD. However, the Project would result in the net increase of approximately 255,936 square feet of commercial space on a largely vacant site. As such, Project implementation would increase the building area and use of the Project Site when compared to existing conditions, thereby increasing the demand for LACoFD services.

The proposed commercial uses would be expected to generate a range of fire service calls similar to what occurs under existing conditions in the vicinity of the Project Site. The Project would not include any unique hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire stations nearest the Project Site. Additionally, the Project would be required to comply with

the California Fire Code, Universal Building Code, and LACoFD standards, including specific construction specifications, access design, location of fire hydrants, and other design requirements. Compliance with applicable regulatory requirements, including LACoFD's fire/life safety plan review and demonstrating that adequate fire flow exists, per approval by the Public Works Department, would ensure that adequate fire prevention features would be incorporated into the Project that would reduce the demand on LACoFD facilities and equipment resulting from Project construction and operation.

Therefore, the Project would not require the addition of a new fire station or new fire protection services, the construction and/or expansion of which could result in environmental impacts. Operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or expanded fire services in order to maintain acceptable fire protection services at the Project Site. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

Police protection?

Less Than Significant Impact. Police protection services in the City are provided by the Gardena Police Department (GPD). Protection services include emergency and non-emergency police response, route police patrols, investigative services, traffic enforcement, traffic investigation, and parking code enforcement. The police station is located at 1718 West 162nd Street, approximately 0.75 mile north of the Project Site.

As discussed in Section 2.14, Population and Housing, the Project would not include housing that would result in a direct increase in the City's population to be served by GPD. However, a portion of the Project site is currently undeveloped and periodically occupied by non-confirming and/or illegal uses that result in a notable amount of calls for GPD services. Since 2016, there have been 20 code enforcement cases opened, with several listed violations, for the Project site, including a hazardous conditions case that ended in red tagging the building While the proposed Project would result in an intensified use of the Project Site, the Project would incorporate security features to reduce the demand for police protection services. These features would include sufficient lighting throughout the Project Site to ensure safety and visibility with illuminated entryways, walkways and closed-circuit television monitoring.

Overall, the intended uses of the Project site upon buildout (i.e., storage and warehouse uses) are uses that would not generate high demand for or notably increase service calls for police protection. Therefore, the Project would not require the addition of a new police station or new police protection services, the construction and/or expansion of which could result in environmental impacts. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

Schools?

Less Than Significant Impact. The City is served by the Los Angeles Unified School District (LAUSD). The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause schools to be constructed or existing schools to be expanded. The Proposed Project does not include a residential

component and is not expected to substantially increase the residential population of the City (see Section 2.14). Nonetheless, as required by Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of a building permit. Pursuant to Government Code Section 65995, the payment of school development fees is considered mitigation for any potential school service-related impacts. As such, the Proposed Project is not expected to cause increases in demand for school facilities such that new or expanded facilities would be needed. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

Parks?

Less Than Significant Impact. Physical deterioration of park facilities is usually caused by overuse due to a lack of additional/alternative facilities to accommodate population growth. The Proposed Project would not include the construction of any infrastructure or housing that would directly or indirectly induce significant population growth, as explained in Section 2.14. While employees at the Project Site could use nearby parks, including Arthur Lee Johnson Memorial Park and Gardena Willows Wetland Preserve, located approximately 0.25-mile northeast of the Project Site, they would be expected to primarily use parks near to their place of residence. As such, development of the Proposed Project is not expected to result in increased demands to park facilities such that new or expanded facilities would be required. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

Other public facilities?

Less Than Significant Impact. Other public facilities and services provided within the City include library services and City administrative services. Library services are provided at the Mayme Dear Library, which is approximately 0.75 mile north of the Project Site. Increased use of library services is generally associated with an increase in residents. While the employees of the Proposed Project could use the local library services, employees are generally expected to primarily use libraries near their place of residence. City administrative services are provided at Gardena City Hall, which is also located approximately 0.75 mile north of the Project Site. Similar to library services, employees are expected to use City administrative services near their place of residence. As such, development of the Proposed Project is not expected to result in increased demands to other public facilities (such as library services or City administrative services) such that new or expanded facilities would be required. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

2.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
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?	☐	☐	☐	☒

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?

The Less Than Significant Impact. Physical deterioration of park facilities is usually caused by overuse due to a lack of additional/alternative facilities to accommodate population growth. The Proposed Project would not include the construction of any infrastructure or housing that would directly or indirectly induce significant population growth in the surrounding area, as explained in Section 2.14. While employees at the Project Site could use nearby parks and recreational areas, including Arthur Lee Johnson Memorial Park and Gardena Willows Wetland Preserve, located approximately 0.25-mile northeast of the Project Site, they would be expected to primarily use parks near to their place of residence. As such, development of the Proposed Project would not result in substantial deterioration of existing parks or recreational facilities, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

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?

No Impact. The Proposed Project does not include recreational facilities and as described in (a) above, would not induce population growth that could increase demand for recreational facilities such that recreational facilities would need to be constructed or expanded. The Proposed Project would have no impact related to construction or expansion of recreational facilities. This issue will not be further analyzed in the EIR.

2.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
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)?	☒	☐	☐	x☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

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

Potentially Significant Impact. The Proposed Project includes the construction and operation of a 268,000 square foot building containing industrial/warehouse, office/retail and self-storage uses. Project-generated traffic during construction would include worker-related commuter trips, trucks used for delivering construction equipment, and trucks used for delivering and hauling construction materials and wastes. Project-generated traffic during operation would include employee-related vehicle trips and vehicle trips associated with loading/delivery trucks. The trips generated as a result of the Proposed Project have the potential to conflict with City policies for the circulation system. As such, a transportation study will be prepared as part of the EIR and will include an analysis of potential conflicts with applicable plans and policies addressing the circulation system. Therefore, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. CEQA Guidelines Section 15064.3 establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts, facilitating a shift

from the use of level of service (LOS) to evaluate the impacts of traffic and transportation on the environment. VMT is the amount and distance of automobile travel attributable to a project, while LOS is a measure of intersection and roadway operations based on vehicle delay and congestion. CEQA Guidelines Section 15064.3(b) describes specific considerations for evaluating the transportation impacts for several categories of development and is divided into subsections addressing land use projects, transportation projects, and projects warranting qualitative traffic analysis. For land use projects, Section 15064.3(b) states that "VMT exceeding an applicable threshold of significance may indicate a significant impact." Additionally, the City has adopted its own local CEQA thresholds of significance for transportation impacts and local transportation assessment guidelines (City of Gardena 2020). Further studies are required to determine whether the Project may result in VMT that exceeds the City's local thresholds. As such, this issue will be further analyzed in the EIR.

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 would include self-storage, industrial warehouse and office/retail uses. The Project would not include any offsite traffic improvements that could increase hazards, nor would operations involve any incompatible uses. This issue will not be further analyzed in the EIR.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. The City has developed an Emergency Operations Plan (EOP) to facilitate emergency management. The EOP addresses the planned response to extraordinary emergency situations associated with natural disasters, technological incidents and national security emergencies. It establishes emergency organizations, assigns tasks, specifies policies and procedures and is designed to include the City in the California Standardized Emergency Management System (SEMS) (City of Garden 2006a). The City's police department also administers the Gardena Community Emergency Response Training (CERT) program, which trains residents to assist safety personnel and City staff in the event of a major disaster (Gardena Police Department 2022).

The construction and operation of the Proposed Project is not anticipated to interfere with emergency preparedness initiatives or with responses to an emergency. Furthermore, the Proposed Project's design and operations would be required to adhere to applicable aspects of the EOP. As such, the Proposed Project would not obstruct or interfere with implementation of the City's EOP. Rather, the plans would proceed in a similar manner with or without the Project.

The City's disaster route map identifies Artesia Boulevard as a disaster route (LADPW 2008). However, the Proposed Project does not include any improvements within Artesia Boulevard. Additionally, any construction impacts to traffic flow along Artesia Boulevard, such as during large equipment delivery, would be temporary in nature and would be controlled via standard construction best management practices, which include construction traffic control measures. As such, Project construction is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

During operations, the Project would increase the number of people present on the Project Site relative to existing conditions. The Project would therefore result in an incremental increase in the number of people who would need to evacuate and/or receive emergency services, particularly during business hours. However, as explained in Section 2.14, the employment growth associated with the Project would fall well within projections for the City, is not substantial, and has been accounted for in local and regional planning efforts. As such, the additional employees associated with the Project would not substantially alter the proceedings of the City's emergency response plan or evacuation plan.

Furthermore, the Proposed Project would not introduce any physical obstructions or impairments to emergency response or evacuation. The Los Angeles County Fire Department would review the Proposed Project plans to ensure adequate emergency access in and around the site as part of the building plan check process. The plans would be adjusted in the event that the fire department identifies any deficiencies in access that could preclude emergency evacuation or emergency response. In the event of a disaster during Project construction or operation, the City's emergency plans would proceed in a similar fashion with or without the Proposed Project. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

2.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
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:				
a) 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	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

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:

a) 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)?

Potentially Significant Impact. The Project would involve ground-disturbing activities that could have the potential to disturb tribal cultural resources, in the event that any are present within areas of ground disturbance. A record search of the Native American Heritage Commission (NAHC) Sacred Lands File was completed in February of 2022, the results of which were negative. However, at the request of the NAHC, outreach to local tribes has been undertaken. These tribes include the Gabrieleno Band of Mission Indians – Kizh Nation, the Gabrieleno/Tongva San Gabriel Band of Mission Indians, the Gabrielino/Tongva Nation, the Gabrielino Tongva Indians of California Tribal Council, the Gabrielino-Tongva Tribe, the Santa Rosa Band of Cahuilla Indians, and the Soboba Band of Luiseno Indians. Only the Kizh Nation responded and the City is in the process of consultation with the Tribe. If any issues related to tribal cultural resources are identified as a result of the City's ongoing outreach activities, this issue will be further discussed in the EIR. If no tribal cultural resources are identified, no further analysis will be required.

b) 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.

Potentially Significant Impact. See the discussion in Section 2.18(a).

2.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
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?	☒	☐	☐	☐

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?

Potentially Significant Impact. The Proposed Project would include installation of new utility connections to the City's existing utility infrastructure. This would involve installing connections to existing water lines and sewer lines within Artesia Boulevard, installing stormwater drainage infrastructure within the Project Site that connects to existing infrastructure within the surrounding roadways, and installing connections to existing electrical, gas, and telecommunications lines. These utility improvements are expected to occur within the Project Site and along the Project Site's immediate street frontages and would involve trenching within Artesia Boulevard. These improvements are considered part of the Project's construction activities. As such, the construction effects of installing these improvements are evaluated in the construction analysis within this Initial Study. As described throughout this Initial Study, some construction-related effects (e.g., air quality, noise, and transportation) require further analysis in the EIR. Thus, potential effects of utility improvements will be further evaluated as part of the construction analysis in the EIR.

There are existing utility lines within and adjacent to the Project Site. These existing lines would be protected in place during construction or relocated if necessary. Any relocations would be accommodated within the Project footprint and would not involve additional areas of construction or excavation beyond what will be analyzed as part of the Proposed Project's construction scenario. As described throughout this Initial Study, some construction-related effects (e.g., air quality, noise, and transportation) require further analysis in the EIR. Thus, potential effects of utility relocations will be further evaluated as part of the construction analysis in the EIR.

The Proposed Project would represent an intensification of use on the Project Site compared to existing conditions. Project operation would increase consumption of water, natural gas, and electricity and would increase on-site wastewater generation. It is currently unknown whether existing facilities can accommodate the increases in demand that would be associated with the Proposed Project. The EIR will present an analysis of the Project's utility demands and will compare these demands to the capacities of existing facilities. As such, the Project's potential need for new or expanded facilities will be further analyzed in the EIR.

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?

Potentially Significant Impact. The Proposed Project would represent an increased intensity of use at the Project Site, which would generate an increase in on-site water use. The EIR will include an evaluation of whether the Project water demands are anticipated and accounted for within the adopted Urban Water Management Plan. As such, further analysis will be presented in the EIR to determine the sufficiency of existing water supplies relative to anticipated Project demands. Therefore, this issue will be further analyzed in the EIR.

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?

Potentially Significant Impact. Because the Proposed Project would increase the intensity of use at the Project Site, Project operation would increase on-site wastewater generation. Further analysis will be presented in the EIR to determine the sufficiency of existing wastewater treatment facilities, and more specifically, the Los Angeles County Sanitation District Joint Water Pollution Control Plant, relative to anticipated Project demands. As such, this issue will be further analyzed in the EIR.

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?

Potentially Significant Impact. The Proposed Project would increase the intensity of use at the Project Site, which would increase solid waste generation compared to existing conditions during both construction and operation. While Project construction and operation would not be expected to generate sufficient solid waste such that regional landfill capacity would be impacted, the EIR will study the Proposed Project's anticipated solid waste generation during both construction and operation relative to landfill capacity and its consistency with applicable solid waste reduction standards and goals. As such, this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. As stated in (d) above, the EIR will evaluate the Proposed Project's consistency with applicable solid waste reduction standards and goals.

2.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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

No Impact. The Proposed Project Site is not located within a state responsibility area and there are no state responsibility areas in the vicinity of the Project Site. The nearest state responsibility areas are located approximately 20 miles northeast of the Project Site, in the Puente Hills (CAL FIRE 2022b). As described in Section 2.9(g), the Project Site is also not within a VHFHSZ. At its closest point, the nearest VHFHSZ is located approximately 6 miles southwest of the Project Site within the cities of Palos Verdes Estates and Rolling Hills Estates (CAL FIRE 2022a). Therefore, the assessment of potential wildfire impacts of the Proposed Project is not required. No impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The Proposed Project Site is not located within a state responsibility area and there are no state responsibility areas in the vicinity of the Project Site. The nearest state responsibility areas are located approximately 20 miles northeast of the Project Site, in the

Puente Hills (CAL FIRE 2022b). As described in Section 2.9(g), the Project Site is also not within a VHFHSZ. At its closest point, the nearest VHFHSZ is located approximately 6 miles southwest of the Project Site within the cities of Palos Verdes Estates and Rolling Hills Estates (CAL FIRE 2022a). Therefore, the assessment of potential wildfire impacts of the Proposed Project is not required. No impact would occur, and this issue will not be further analyzed in the EIR.

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 Site is not located within a state responsibility area and there are no state responsibility areas in the vicinity of the Project Site. The nearest state responsibility areas are located approximately 20 miles northeast of the Project Site, in the Puente Hills (CAL FIRE 2022b). As described in Section 2.9(g), the Project Site is also not within a VHFHSZ. At its closest point, the nearest VHFHSZ is located approximately 6 miles southwest of the Project Site within the cities of Palos Verdes Estates and Rolling Hills Estates (CAL FIRE 2022a). Therefore, the assessment of potential wildfire impacts of the Proposed Project is not required. No impact would occur, and this issue will not be further analyzed in the EIR.

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 Site is not located within a state responsibility area and there are no state responsibility areas in the vicinity of the Project Site. The nearest state responsibility areas are located approximately 20 miles northeast of the Project Site, in the Puente Hills (CAL FIRE 2022b). As described in Section 2.9(g), the Project Site is also not within a VHFHSZ. At its closest point, the nearest VHFHSZ is located approximately 6 miles southwest of the Project Site within the cities of Palos Verdes Estates and Rolling Hills Estates (CAL FIRE 2022a). Therefore, the assessment of potential wildfire impacts of the Proposed Project is not required. No impact would occur, and this issue will not be further analyzed in the EIR.

2.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
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?	☒	☐	☐	☐
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.)	☒	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

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?***

Potentially Significant Impact. As discussed in Section 2.4, the Project Site is located in a developed and urbanized area and does not support sensitive vegetation, sensitive wildlife species, or sensitive habitat. The Project Site is situated along two major roadways (Artesia

Boulevard and Normandie Avenue) and a rail line in a developed area characterized by vehicle traffic, urban noise, and activity. The Proposed Project would involve ground disturbance and development of the Project Site, which currently supports some trees and vegetation. Due to the existing conditions of the Project Site and surrounding area, as well as the absence of suitable habitat on these properties, the Proposed Project would not 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. However, the Project area contains vegetation that has the potential to support nesting birds and raptors which are protected under the California Fish and Game Code and under the federal Migratory Bird Treaty Act. In the event that any nesting birds or raptors are present during construction activities, the birds and/or raptors would be protected in accordance with the condition of approval set forth in Section 2.4(a), which would require a pre-construction nesting bird and raptor survey to be completed if construction is initiated during the nesting season. In accordance with this condition of approval, any nesting birds or raptors that are discovered within or near the Project Site would be avoided. Impacts to biological resources resulting from the Proposed Project would therefore be less than significant. This issue will not be further analyzed in the EIR.

However, further cultural resource investigations are required and will be presented in the EIR to determine any potential impacts that the Proposed Project would have on important examples of the major periods of California history or prehistory. Therefore, effects to cultural resources would be further examined in the EIR.

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.)

Potentially Significant Impact. As described throughout this Initial Study, the Proposed Project has the potential to result in a variety of potentially significant impacts requiring further analysis in the EIR. It is also anticipated that the Proposed Project may be developed while other Projects in the area are being developed, and the incremental effects of this Project may be cumulatively considerable. Therefore, potential cumulative impacts resulting from Project construction or operations have the potential to be significant and will be further analyzed in the EIR.

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

Potentially Significant Impact. As detailed throughout this Initial Study, the Proposed Project could result in a variety of significant effects, some of which have the potential to affect human beings. As such, further analysis will be provided in the EIR.

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3.2 List of Preparers

Dudek

Nicole Cobleigh – Project Manager
Laura Masterson – Deputy Project Manager
Michael Cady – Senior Biologist
Andrew Greis – GIS Analyst

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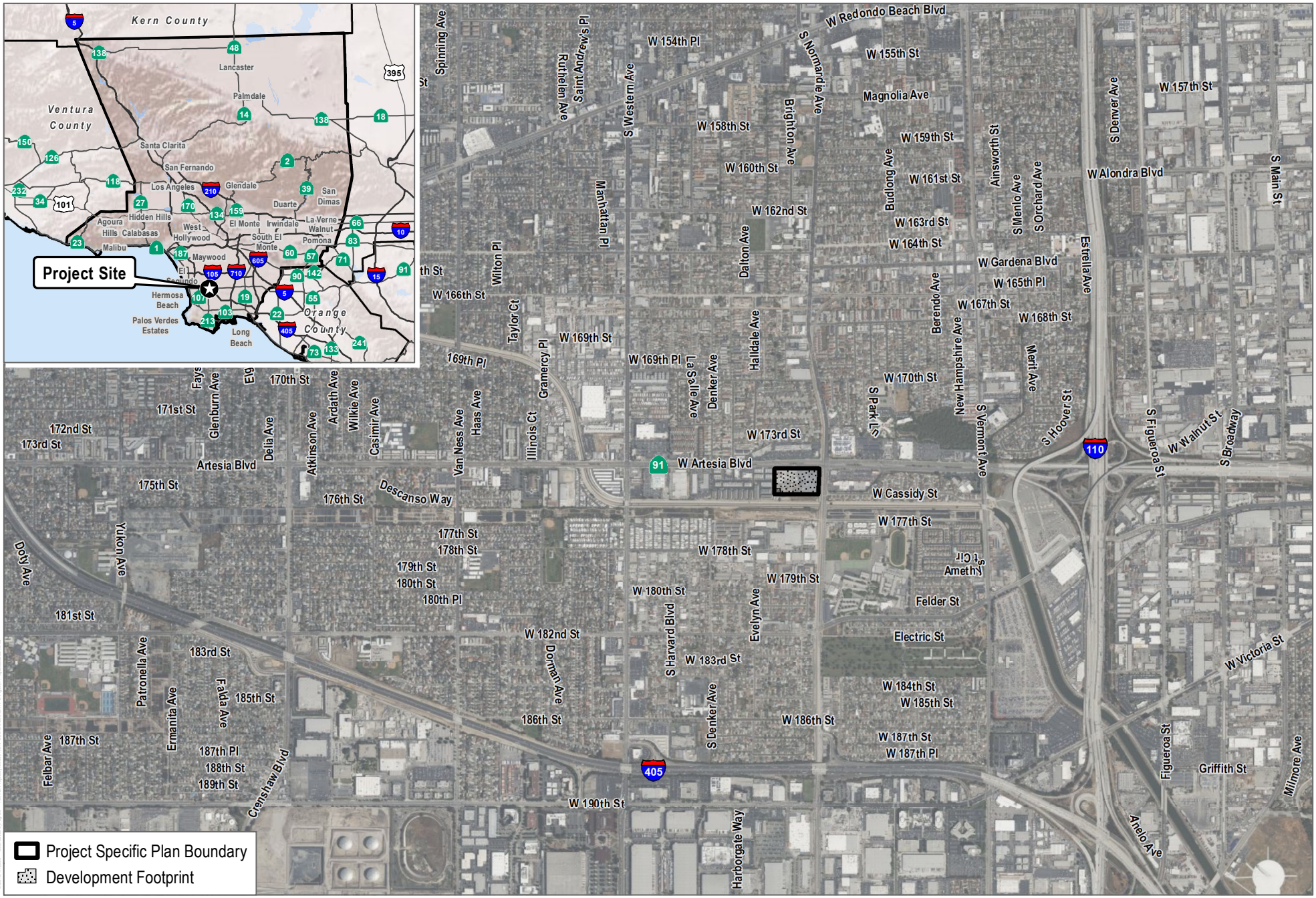

SOURCE: County of Los Angeles; City of Gardena Specific Plan; Open Street Map; Bing Maps

DUDEK

FIGURE 1

Project Location

1450 Artesia Boulevard Specific Plan

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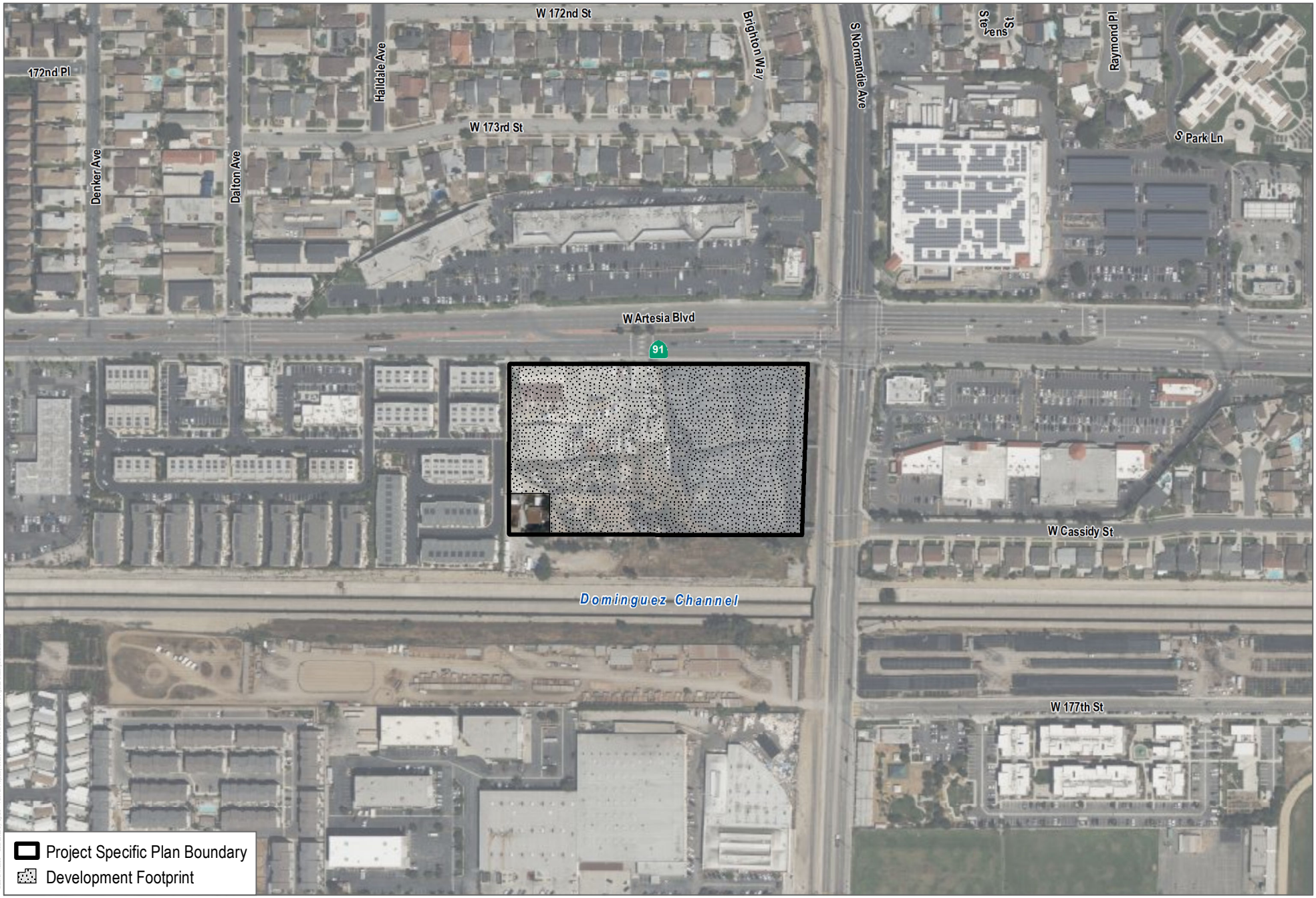

SOURCE: County of Los Angeles; City of Gardena Specific Plan; Open Street Map; USGS NHD; Bing Maps

DUDEK

0 150 300 Feet

FIGURE 2

Existing Conditions

1450 Artesia Boulevard Specific Plan

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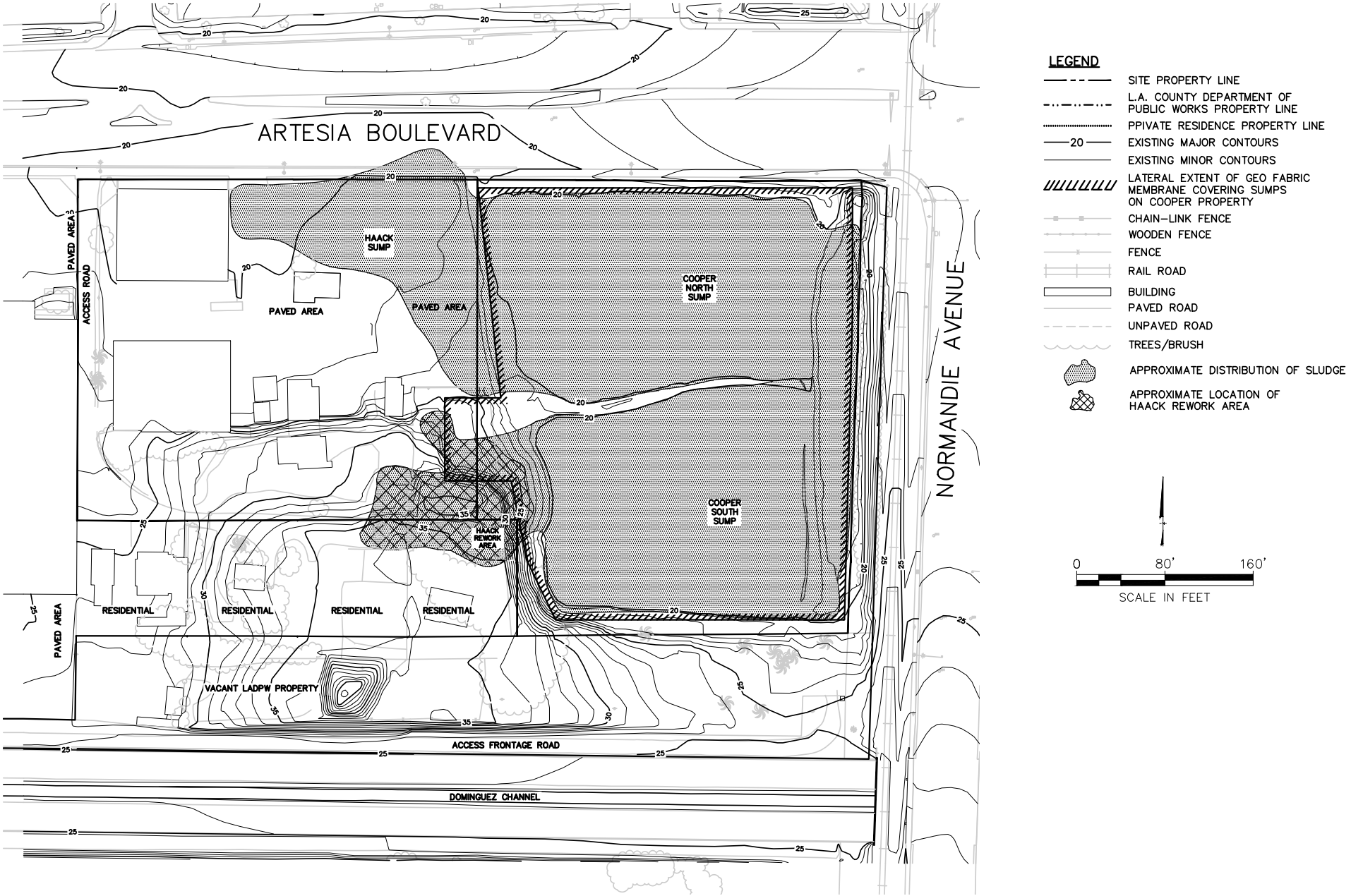

SOURCE: Geosyntec, 2020

FIGURE 3

Site Contamination

1450 Artesia Boulevard Specific Plan

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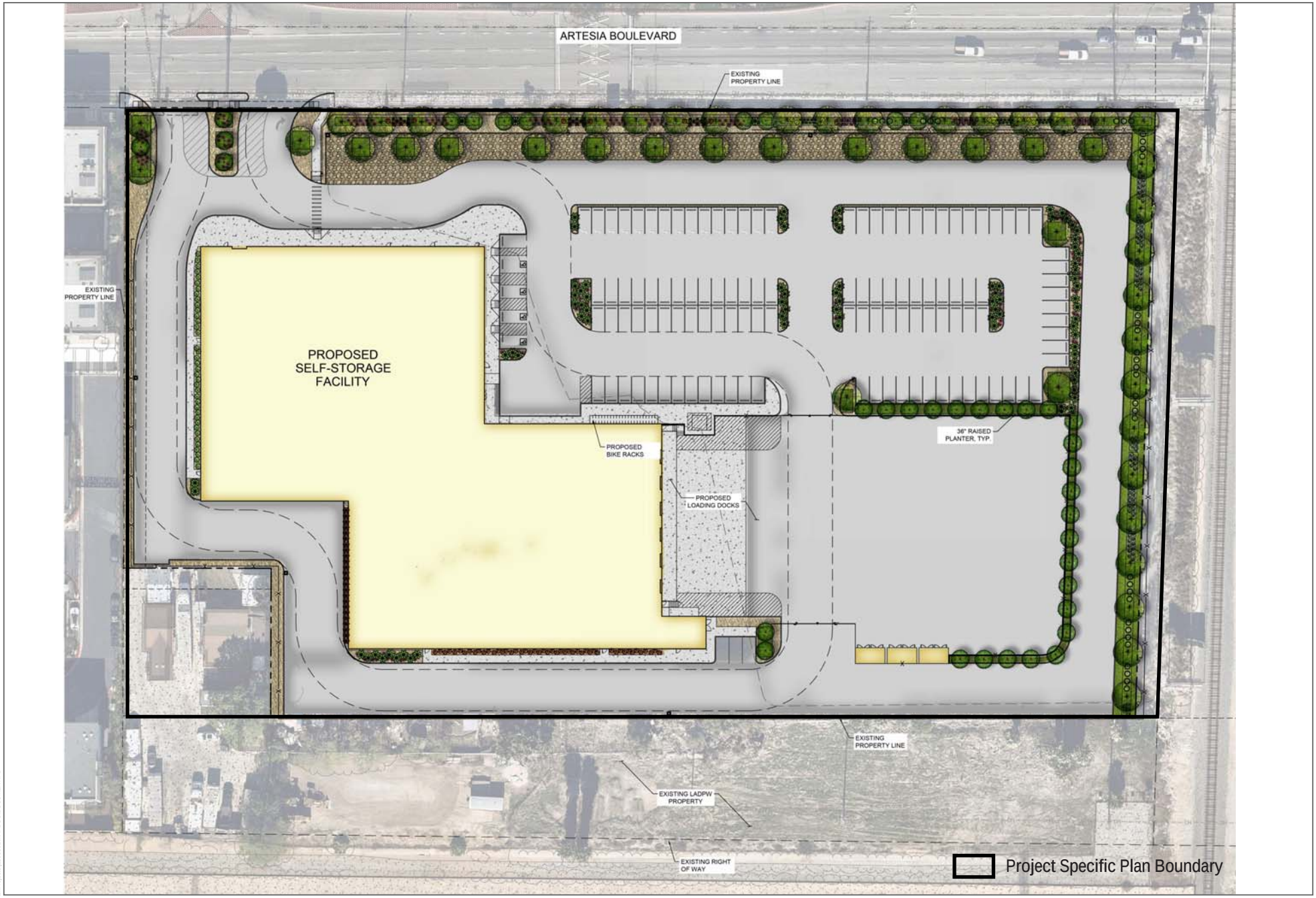

SOURCE: Kimley-Horn 2023

FIGURE 4
Site Plan
1450 Artesia Boulevard Specific Plan

DUDEK

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SOURCE: County of Los Angeles; City of Gardena Specific Plan; Open Street Map; USGS NHD; Bing Maps

DUDEK

0 200 400 Feet

FIGURE 5

General Plan Land Use

1450 Artesia Boulevard Specific Plan

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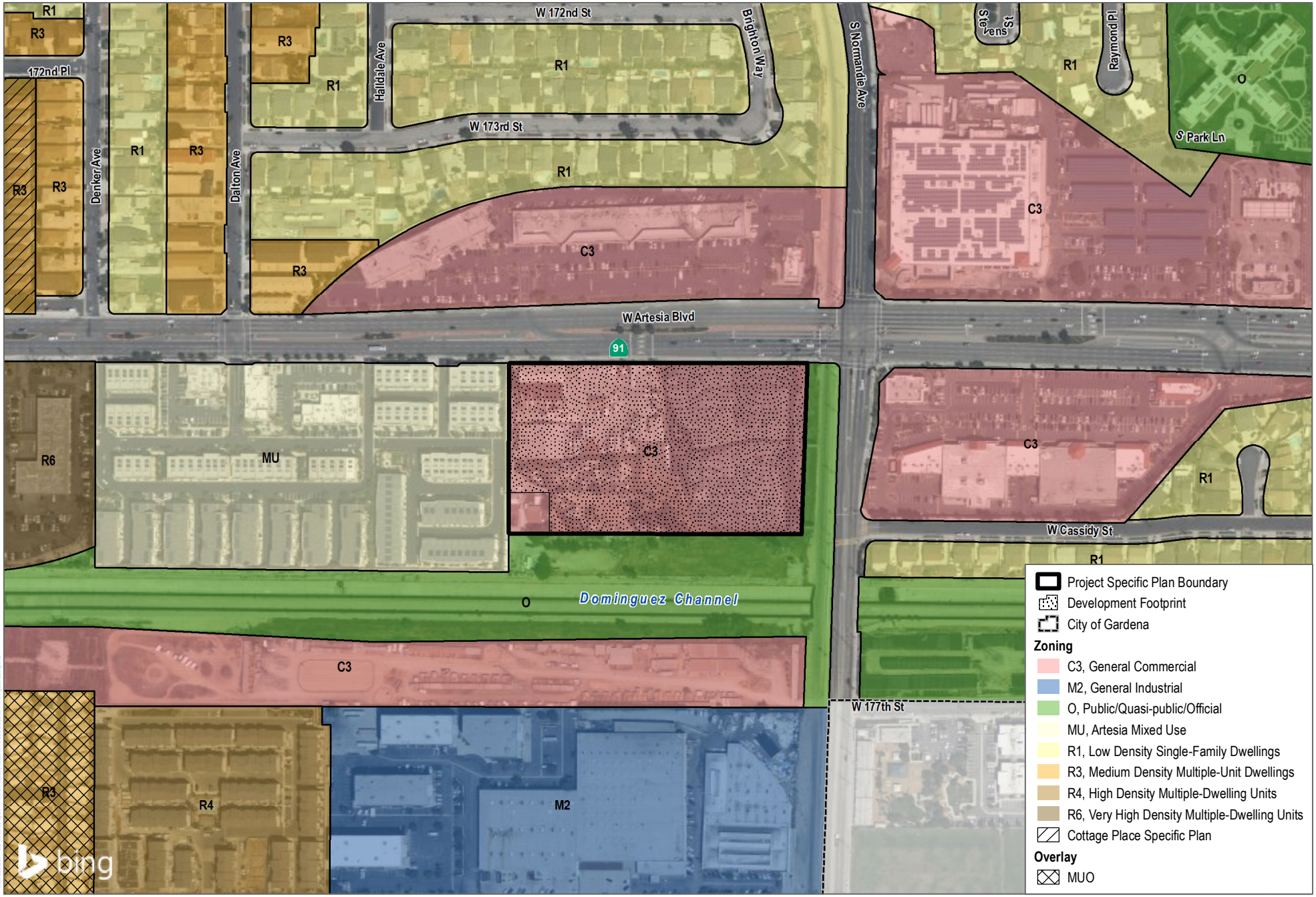

SOURCE: County of Los Angeles; City of Gardena Specific Plan; Open Street Map; USGS NHD; Bing Maps

DUDEK

0 200 400 Feet

FIGURE 6

Zoning

1450 Artesia Boulevard Specific Plan

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ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE

1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

E-Mail: EJ@doj.ca.gov

June 13, 2023

Amanda Acuna, Senior Planner
City of Gardena
1700 West 162nd Street
Gardena, CA 90247

RE: 1450 Artesia Blvd. Specific Plan, SCH #2023060263

Dear Ms. Acuna:

Thank you for the opportunity to provide comments on the Notice of Preparation for the 1450 Artesia Blvd. Specific Plan. While the logistics industry is an important component of our modern economy, warehouses can bring various environmental impacts to the communities where they are located. For example, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[1] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[2] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate can contribute to traffic jams, deterioration of road surfaces, traffic accidents, and unsafe conditions for pedestrians and bicyclists. Depending on the circumstances of an individual project, warehouses may also have other environmental impacts.

To help lead agencies avoid, analyze, and mitigate warehouses' environmental impacts, the Attorney General Office's Bureau of Environmental Justice has published a document containing best practices and mitigation measures for warehouse projects. We have attached a copy of this document to this letter, and it is also available online.[3] We encourage you to

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[1] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts; Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (DPM).

[2] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

[3] https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf.

consider the information in this document as you prepare the draft environmental impact report for this project.

Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts. However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse.

The Bureau will continue to monitor proposed warehouse projects for compliance with the California Environmental Quality Act and other laws. We are available to discuss as you prepare the draft environmental impact report and consider how to guide warehouse development in your jurisdiction. Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

Sincerely,

CHRISTIE VOSBURG
Supervising Deputy Attorney General

For ROB BONTA
Attorney General

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ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE

Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

Table of Contents

In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)[1] regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies regarding warehouse projects, and in rare cases the Bureau has filed litigation to enforce CEQA.[2] This document builds upon the Bureau's work on warehouse projects, collecting information gained from the Bureau's review of hundreds of warehouse projects across the state.[3] It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.[4] While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, nearly all of which have been adapted from actual warehouse projects in California.

I. Background

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.[5] California, with its ports, population centers, and transportation network, has found itself at the center of this trend. In 2020, the Ports of Los Angeles, Long Beach, and Oakland collectively accounted for over 34% of all United States international container trade.[6] The Ports of Los Angeles and Long Beach alone generate about 35,000 container truck trips every day.[7] Accordingly, the South Coast Air Basin now contains approximately 3,000 warehouses of over 100,000 square feet each, with a total warehouse capacity of approximately 700 million square feet, an increase of 20 percent over the last five years.[8] This trend has only accelerated, with e-commerce growing to

[1] https://oag.ca.gov/environment/justice.
[2] https://oag.ca.gov/environment/ceqa; *People of the State of California v. City of Fontana* (Super. Ct. San Bernardino County, No. CIVSB2121829); *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).
[3] This September 2022 version revises and replaces the prior March 2021 version of this document.
[4] Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.
[5] As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers.
[6] Data from the Bureau of Transportation Statistics, Container TEUs (Twenty-foot Equivalent Units) (2020), https://data.bts.gov/stories/s/Container-TEU/x3fb-aeda/ (Ports of Los Angeles, Long Beach, and Oakland combined for 14.157 million TEUs, 34% of 41.24 million TEUs total nationwide) (last accessed September 18, 2022).
[7] U.S. Dept. of Transportation, Federal Highway Administration, *FHWA Operations Support – Port Peak Pricing Program Evaluation* (2020), available at https://ops.fhwa.dot.gov/publications/fhwahop09014/sect2.htm (last accessed September 18, 2022).
[8] South Coast Air Qual. Mgmt. Dist., *Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305*, at 7-8, 41 (May 2021).

13% of all retail sales and 2021 being a second consecutive record year for new warehouse space leased.[9] The latest data and forecasts predict that the next wave of warehouse development will be in the Central Valley.[10]

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[11] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[12] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents.

These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts and systemic vulnerability. For example, a comprehensive study by the South Coast Air Quality Management District found that communities located near large warehouses scored far higher on California's environmental justice screening tool, which measures overall pollution and demographic vulnerability.[13] That

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[9] U.S. Census Bureau News, Quarterly Retail E-Commerce Sales 4th Quarter 2021 (February 22, 2022), https://www.census.gov/retail/mrts/www/data/pdf/ec_current.pdf (last accessed September 18, 2022); CBRE Research, *2022 North America Industrial Big Box Report: Review and Outlook*, at 2-3 (March 2022), *available at* https://www.cbre.com/insights/reports/2022-north-america-industrial-big-box#download-report (last accessed September 18, 2022).

[10] CBRE Research, *supra note* 9, at 4, 36; New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), *available* at https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html.

[11] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (last accessed September 18, 2022) (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts (last accessed September 18, 2022); Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (last accessed September 18, 2022) (DPM).

[12] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (last accessed September 18, 2022) (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

[13] South Coast Air Quality Management District, "Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305" (May 2021), at 4-5.

study concluded that, compared to the South Coast Air Basin averages, communities in the South Coast Air Basin near large warehouses had a substantially higher proportion of people of color; were exposed to more diesel particulate matter; had higher rates of asthma, cardiovascular disease, and low birth weights; and had higher poverty and unemployment rates.[14] Each area has its own unique history, but many of these impacts and vulnerabilities reflect historic redlining practices in these communities, which devalued land and concentrated poverty, racial outgroups, and pollution into designated areas.[15]

II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically guide warehouse development, we encourage local governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and direct sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

Proactive planning can take many forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors[16] can help attract investment while avoiding conflicts between warehouse facilities and residential communities. Transition zones with lighter industrial and commercial land uses may also help minimize conflicts between residential and industrial uses.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related general plan elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help

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[14] *Id*. at 5-7.

[15] Beginning in the 1930s, federal housing policy directed investment away from Black, immigrant, and working-class communities by color-coding neighborhoods according to the purported "riskiness" of loaning to their residents. In California cities where such "redlining" maps were drawn, nearly all of the communities where warehouses are now concentrated were formerly coded "red," signifying the least desirable areas where investment was to be avoided. *See* University of Richmond Digital Scholarship Lab, Mapping Inequality, https://dsl.richmond.edu/panorama/redlining/#loc=12/33.748/-118.272&city=los-angeles-ca (Los Angeles), https://dsl.richmond.edu/panorama/redlining/#loc=13/32.685/-117.132&city=san-diego-ca (San Diego), https://dsl.richmond.edu/panorama/redlining/#loc=11/37.81/-122.38&city=oakland-ca (Oakland), https://dsl.richmond.edu/panorama/redlining/#loc=13/37.956/-121.326&city=stockton-ca (Stockton), https://dsl.richmond.edu/panorama/redlining/#loc=12/36.751/-119.86&city=fresno-ca (Fresno) (all last accessed September 18, 2022).

[16] In this document, "sensitive receptors" refers to residences, schools, public recreation facilities, health care facilities, places of worship, daycare facilities, community centers, or incarceration facilities.

jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.[17]

Local ordinances and good neighbor policies that set development standards for all warehouses in the jurisdiction are a critical and increasingly common tool that serve several goals. When well-designed, these ordinances direct investment to local improvements, provide predictability for developers, conserve government resources by streamlining project review processes, and reduce the environmental impacts of industrial development. While many jurisdictions have adopted warehouse-specific development standards, an ordinance in the City of Fontana provides an example to review and build upon.[18] Good neighbor policies in Riverside County and by the Western Riverside Council of Government include additional measures worth consideration.[19]

The Bureau encourages jurisdictions to adopt their own local ordinances that combine the strongest policies from those models with measures discussed in the remainder of this document.

III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The

[17] For more information about SB 1000, *see* https://oag.ca.gov/environment/sb1000.
[18] https://oag.ca.gov/system/files/attachments/press-docs/Final%20Signed%20Fontana%20Ordinance.pdf (last accessed September 18, 2022).
[19] For example, the Riverside County policy requires community benefits agreements and supplemental funding contributions toward additional pollution offsets, and the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors. https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf (last accessed September 18, 2022) (Riverside County); http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId= (last accessed September 18, 2022) (Western Riverside Council of Governments).

information should be in a format that is easy to navigate and understand for members of the affected community.

- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the affected community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community liaison to the surrounding community.
- Requiring signage in public view at warehouse facilities with contact information for a local designated representative for the facility operator who can receive community complaints, and requiring any complaints to be answered by the facility operator within 48 hours of receipt.

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.[20]
- Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.
- Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.
- Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only.
- Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing, and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.
- Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.
- Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.
- Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.
- Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

[20] CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted in some scenarios. CARB, Concept Paper for the Freight Handbook (December 2019), *available at* https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf (last accessed September 18, 2022).

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation.[21]
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is required regardless of CEQA.
- Disclosing air pollution from the entire expected length of truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin, local jurisdiction, or other truncated endpoint. All air pollution associated with the project must be considered, regardless of where those impacts occur.

[21] CEQA Guidelines § 15369.

- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California's Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring all heavy-duty vehicles engaged in drayage[22] to or from the project site to be zero-emission beginning in 2030.

[22] "Drayage" refers generally to transport of cargo to or from a seaport or intermodal railyard.

- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of

trucks.

- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound

pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

- Disclosing and considering the significance of short-term noise levels associated with all aspects of project operation (i.e. both on-site noise generation and off-site truck noise). Considering only average noise levels may mask noise impacts sensitive receptors would consider significant—for example, the repeated but short-lived passing of individual trucks or loading activities at night.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a business license

is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.
- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

VIII. Other Significant Environmental Impacts Analysis and Mitigation

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.
- Using full cut-off light shields and/or anti-glare lighting.
- Requiring submission of a property maintenance program for agency review and approval providing for the regular maintenance of all building structures, landscaping, and paved surfaces.
- Using cool pavement to reduce heat island effects.

- Planting trees in parking areas to provide at least 35% shade cover of parking areas within fifteen years to reduce heat island impacts.
- Using light colored roofing materials with a solar reflective index of 78 or greater.
- Including on-site amenities, such as a truck operator lounge with restrooms, vending machines, and air conditioning, to reduce the need for truck operators to idle or travel offsite.
- Designing skylights to provide natural light to interior worker areas.
- Installing climate control and air filtration in the warehouse facility to promote worker well-being.

IX. Conclusion

California's world-class economy, ports, and transportation network position it at the center of the e-commerce and logistics industry boom. At the same time, California is a global leader in environmental protection and environmentally just development. The guidance in this document furthers these dual strengths, ensuring that all can access the benefits of economic development. The Bureau will continue to monitor proposed projects for compliance with CEQA and other laws. Lead agencies, developers, community advocates, and other interested parties should feel free to reach out to us as they consider how to guide warehouse development in their area.

Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

DEPARTMENT OF TRANSPORTATION
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Making Conservation a California Way of Life.

July 2, 2023

Amanda Acuna
City of Gardena, Senior Planner
1700 West 162nd Street
Gardena, CA 90247

RE: 1450 Artesia Boulevard Specific Plan Project – NOP (Notice of Preparation of a Draft EIR)
SCH #2023060263
GTS #07-LA-2023-04255
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 City of Gardena proposes the construction and operation of a mixed-use development with a total building area of 268,000 square feet and an approximate height of 75 feet, including a self-storage use, an industrial warehouse use, and an office/retail use. Proposed associated facilities and improvements include perimeter fencing, onsite and perimeter landscaping, lighting, and exterior sidewalks. The Project seeks to develop an underutilized, blighted and environmentally impacted property with industrial and commercial uses along Artesia Boulevard.

After reviewing the NOP, Caltrans has the following comments:

Vehicular access to the Project site would be provided via one dedicated 90-foot driveway with a raised separation median to separate the entry and exit sides of the driveway on Artesia Boulevard. The driveway provides for right-turn in and right-turn out only. The Project proposes parking to be located on the northeastern portion of the site, comprising approximately 124 parking spaces, including five accessible spaces, and 15 electric vehicle (EV)-ready spaces.

Currently the project is designed in a way that will induce additional Vehicle Miles Traveled (VMT) through project-generated traffic during construction and operation from the industrial/warehouse, office/retail, and self-storage uses. The Lead Agency is encouraged to integrate Traffic Demand Management (TDM) strategies in a way that reduces VMT and Greenhouse Gas (GHG) emissions to meet California's established goals and mandates for GHG reduction.

For any project to better promote existing transit options and reduce vehicle miles traveled, Caltrans recommends the implementation of TDM elements as an alternative to building an

excessive amount of parking. Reducing the amount of car parking supplied acts against enabling driving over other methods of transit. Research indicates that removing excess car parking is a proven method of reducing trip demand, improving housing affordability, and encouraging active modes of transportation. Implementing additional electrical car charging spaces would encourage the usage of plug-in hybrid vehicles (PHEVs) or fully electric vehicles (BEVs), which can help to reduce tailpipe emissions and minimize reliance on fuel.

We encourage the Lead Agency to improve pedestrian networks with robust signage at the Project Site during construction, sufficient pedestrian level lighting throughout operation, and active frontage against the sidewalk to create a streetscape that encourages recreational walking. Under the Specific Plan, the parking lot area would be used periodically for City-sponsored outdoor events outside of warehouse/industrial component operating hours. Multiple pedestrian islands and planters located within the parking lot would act to prioritize pedestrian safety and minimize collision with vehicles.

Caltrans would also like to confirm plans for the proposed bike racks located alongside the building for proposed self-storage facility use in Figure 4 of the initial study. If a safe bike lane configuration can be maintained along Artesia Boulevard, Caltrans recommends adding a Class IV bikeway to ensure that the safety of road users is protected during peak hours in the morning and afternoon. Project-generated truck traffic and residential traffic may coincide with interactions between drivers and students from Gardena High School. This lane would intersect with the existing bike route along S. Normandie Ave and further enhance connectivity for Gardena's bicyclist network.

Additionally, 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. It is recommended that large size truck trips be limited to off-peak commute periods.

Caltrans looks forward to reviewing the forthcoming Draft Environmental Impact Report (DEIR) to confirm that there will be measures for supporting active transportation options and ensuring that VMT impact is not generated via induced demand along the major transportation corridor of Artesia Boulevard.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2023-04255.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR Branch Chief

cc: State Clearinghouse

STATE OF CALIFORNIA Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

ACTING CHAIRPERSON
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Chumash

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June 13, 2023

Amanda Acuna
City of Gardena
1700 W 162nd St.
Gardena, CA 90247

Re: 2023060263, 1450 Artesia Boulevard Specific Plan Project, Los Angeles County

Dear Ms. Acuna:

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

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

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

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

AB 52

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

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

a. A brief description of the project.

b. The lead agency contact information.

c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).

d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

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

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

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

a. Alternatives to the project.

b. Recommended mitigation measures.

c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

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

a. Type of environmental review necessary.

b. Significance of the tribal cultural resources.

c. Significance of the project's impacts on tribal cultural resources.

d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

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

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

a. Whether the proposed project has a significant impact on an identified tribal cultural resource.

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

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

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

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

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

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

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

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

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

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

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

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

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

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

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

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

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

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

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

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

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

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

SB 18

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

Some of SB 18's provisions include:

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

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

NAHC Recommendations for Cultural Resources Assessments

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

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

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

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

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LOS ANGELES, CALIFORNIA 90063-3294
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ANTHONY C. MARRONE
FIRE CHIEF
FORESTER & FIRE WARDEN

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

July 12, 2023

Amanda Acuna
1700 West 162nd Street Unit:101
Gardena, CA 90247

Dear Ms. Acuna:

THE INITIAL STUDY, PROPOSES TO ESTABLISH THE "1450 ARTESIA BLVD SPECIFIC PLAN", TO ALLOW DEVELOPMENT WITHIN A 6.3-ACRE AREA FOR CONSTRUCTION OF A MIXED -USE DEVELOPMENT WITH A TOTAL BUILDING AREA OF 268,000 SQUARE FEET, CITY OF GARDENA, FFER2023003116

The Initial Study 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.

LAND DEVELOPMENT UNIT:

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

Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than 28 width.

The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building. The roadway shall provide approved signs and/or stripping stating, "NO PARKING - FIRE LANE" and shall be maintained in accordance with the County of Los Angeles Fire Code.

All proposed development within the 1450 Artesia Boulevard Specific Plan shall comply with the County of Los Angeles Fire Code for adequate water and access for firefighting purposes.

When involved with subdivision in a city contracting 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.

Specific fire and life safety requirements for the construction phase will be addressed at the Fire Department building plan check review. There may be additional fire and life safety requirements during this time.

Every building constructed shall provide an adequate water supply for fire protection purposes in compliance with the County of Los Angeles Fire Code.

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, FPEA II, at (323) 890-4243 or 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 (HHMD) of the Los Angeles County Fire Department advises that the Cal-EPA Department of Toxic Substances Control (DTSC) is currently overseeing the assessment and future mitigation of contaminated soil at the project site. Coordinate project development activities with the DTSC prior to disturbing onsite soil. HHMD has no additional comments or requirements 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 if you have any questions.

Very truly yours,

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

RMD:pg

LOS ANGELES COUNTY
SANITATION DISTRICTS
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager
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Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

June 29, 2023

Ref. DOC 6944605

VIA EMAIL aacuna@cityofgardena.org

Ms. Amanda Acuna, Senior Planner
Community Development Department
City of Gardena
1700 West 162nd Street
Gardena, CA 90247

Dear Ms. Acuna:

NOP Response to 1450 Artesia Boulevard Specific Plan

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the subject project located in the City of Gardena on June 9, 2023. The proposed project is located within the jurisdictional boundaries of District No. 5. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge directly to the Districts' Gardena Pump Trunk Sewer, located in West Artesia Boulevard, between Normandie Avenue and Dalton Avenue. The Districts' 19.9–inch diameter trunk sewer has a capacity of 2.7 million gallons per day (mgd) and conveyed a peak flow of 2.3 mgd when last measured in 2017. A 6-inch diameter or smaller direct connection to a Districts' trunk sewer requires a Trunk Sewer Connection Permit issued by the Districts. An 8-inch diameter or larger direct connection to a Districts' trunk sewer requires submittal of Sewer Plans for review and approval by the Districts. For additional information, please contact the Districts' Engineering Counter at engineeringcounter@lacsd.org or (562) 908-4288, extension 1205.

2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 243.1 mgd.

3. The expected increase in average wastewater flow from the project, described in the Initial Study as 186,000 square feet of self-storage use, 72,000 square feet of industrial warehouse use, 10,000 square feet of office and/or retail use, and potentially an additional 10,000 square feet of warehouse use, is 6,037 gallons per day, after all structures on the project site are demolished. For a copy of the Districts' average wastewater generation factors, go to 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.

4. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining

the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, please contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts 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 developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacsd.org.

Very truly yours,

Mandy Huffman

Mandy Huffman
Environmental Planner
Facilities Planning Department

MNH:mnh

cc: A. Schmidt
A. Howard

SCAG
INNOVATING FOR A BETTER TOMORROW

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
www.scag.ca.gov

July 10, 2023

Amanda Acuna, Senior Planner
City of Gardena, Community Development Department
1700 W 162nd Street
Gardena, California 90247
Phone: (310) 217-6110
E-mail: aacuna@cityofgardena.org

Subject: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the 1450 Artesia Boulevard Specific Plan Project [SCAG NO. IGR10902]

Dear Amanda Acuna:

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the 1450 Artesia Boulevard Specific Plan Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.[1]

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is the authorized regional agency for Intergovernmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the 1450 Artesia Boulevard Specific Plan Project in Los Angeles County. The proposed project includes the construction of 268,000 square feet (SF) mixed-use building with 186,000 SF of self-storage use, 72,000 SF of industrial use, and 10,000 SF of mezzanine office space on a 6.33-acre site.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the IGR Program, attn.: Ryan Bañuelos, Associate Regional Planner, at (213) 630-1532 or IGR@scag.ca.gov. Thank you.

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

[1] Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE 1450 ARTESIA BOULEVARD SPECIFIC PLAN PROJECT [SCAG NO. IGR10902]

CONSISTENCY WITH CONNECT SOCAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with Connect SoCal.

CONNECT SOCAL GOALS

The SCAG Regional Council fully adopted Connect SoCal in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCAL GOALS	
Goal #1:	*Encourage regional economic prosperity and global competitiveness*
Goal #2:	*Improve mobility, accessibility, reliability and travel safety for people and goods*
Goal #3:	*Enhance the preservation, security, and resilience of the regional transportation system*
Goal #4:	*Increase person and goods movement and travel choices within the transportation system*
Goal #5:	*Reduce greenhouse gas emissions and improve air quality*
Goal #6:	*Support healthy and equitable communities*
Goal #7:	*Adapt to a changing climate and support an integrated regional development pattern and transportation network*
Goal #8:	*Leverage new transportation technologies and data-driven solutions that result in more efficient travel*
Goal #9:	*Encourage development of diverse housing types in areas that are supported by multiple transportation options*
Goal #10:	*Promote conservation of natural and agricultural lands and restoration of habitats*

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCAL GOALS		
	Goal	Analysis
Goal #1:	*Encourage regional economic prosperity and global competitiveness*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
Goal #2:	*Improve mobility, accessibility, reliability and travel safety for people and goods*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
etc.		etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the Connect SoCal webpage. Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

The 2020 Connect SoCal also identifies a goods movement system in the SCAG region and develops strategies to address expected growth trends and demands in goods movement. For further information on the goods movement strategies, please see the 2020 Connect SoCal Goods Movement Technical Report. For further information on industrial development and warehousing in Southern California, please see Industrial Warehousing in the SCAG Region.

Connect SoCal identified Key Connections that lie at the intersection of land use, transportation and innovation meant to advance policy discussions and strategies to leverage new technologies and create better partnerships to increase progress on the regional goals. Accelerated Electrification is one of the Key Connections and was established to create a holistic and coordinated approach to de-carbonizing or electrifying passenger vehicles, transit, and goods movement vehicles. The Accelerated Electrification Key Connection sets a vision to reduce both the local and global emissions associated with multiple modes of transportation by deploying clean mobility solutions and the infrastructure needed to support them. SCAG staff encourages the lead agency to incorporate clean mobility solutions and supporting infrastructure into the project, as appropriate.

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast

of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the Connect SoCal Demographics and Growth Forecast Technical Report. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				**Adopted City of Gardena Forecasts**			
	Year 2020	**Year 2030**	**Year 2035**	**Year 2045**	**Year 2020**	**Year 2030**	**Year 2035**	**Year 2045**
Population	19,517,731	20,821,171	21,443,006	22,503,899	61,303	63,107	64,000	65,681
Households	6,333,458	6,902,821	7,170,110	7,633,451	21,333	22,414	22,874	23,695
Employment	8,695,427	9,303,627	9,566,384	10,048,822	29,767	30,517	30,896	32,102

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG's Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the PEIR webpage and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

LOZEAU DRURY LLP
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Oakland, CA 94612
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richard@lozeaudrury.com

Via Email

June 23, 2023

Amanda Acuna, City Planner
Community Development, Planning
1700 W. 162nd Street, Room 101
Gardena, CA 90247
aacuna@cityofgardena.org

Mina Semenza, City Clerk
City of Gardena
1700 W 162nd Street
Gardena, CA 90247
cityclerk.web@cityofgardena.org

Re: CEQA and Land Use Notice Request for 1450 Artesia Boulevard Specific Plan Project (SCH 2023060263)

Dear Ms. Acuna, and Ms. Semenza,

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the proposed 1450 Artesia Boulevard Specific Plan Project (SCH 2023060263), including all actions related or referring to the proposed construction of a 186,000-square foot self-storage building, a 72,000-square foot industrial warehouse, and 124-stall parking lot, located at 1450 Artesia Boulevard in the City of Gardena ("Project").

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

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:
  - Notices of any public hearing held pursuant to CEQA.
  - Notices of determination that an Environmental Impact Report ("EIR") is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
  - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
  - Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.
  - Notices of availability of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.

- Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of any addenda prepared to a previously certified or approved EIR.
- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.
- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

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

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

Richard Drury
Molly Greene
Madeline Dawson
Layne Fajeau
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
richard@lozeaudrury.com
molly@lozeaudrury.com
madeline@lozeaudrury.com
layne@lozeaudrury.com

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

Sincerely,

Layne Fajeau
Lozeau | Drury LLP

From: Amanda Acuna <AAcuna@cityofgardena.org>
Sent: Monday, July 10, 2023 12:29 PM
To: Nicole Cobleigh; Laura Masterson
Cc: lkranitzlaw@gmail.com
Subject: FW: FW: 1450 Artesia NOP Response

Hi Nicole and Laura,

Please see below a comment from the South Bay Bicycle Coalition in response to the NOP.

Amanda Acuna
Senior Planner | City of Gardena
1700 West 162nd Street | Gardena CA | 90247
Phone 310.217.6110 | aacuna@cityofgardena.org
Website: www.cityofgardena.org

From: Dave and Steph Sundius <dwsundius@mindspring.com>
Sent: Monday, July 10, 2023 12:23 PM
To: Amanda Acuna <AAcuna@cityofgardena.org>
Cc: jim@sbbcplus.org; Marven Norman <inlandurbanist@gmail.com>
Subject: Re: FW: 1450 Artesia NOP Response

Dear Amanda Acuna,

The South Bay Bicycle Coalition+ strongly supports the completion of the Dominguez Channel bike path. This crucial path will connect the cities of Hawthorne, Gardena, Torrance, Los Angeles, and Carson. The proposed project could enhance the bike path if properly designed. The SBBC+ encourages consideration of the bike path.

Sincerely,

David Sundius

South Bay Bicycle Coalition+

From: Marven Norman <inlandurbanist@gmail.com>
Sent: Saturday, July 8, 2023 8:43 AM
To: aacuna@cityofgardena.org
Cc: contact@sbbcplus.org
Subject: 1450 Artesia NOP Response

Hello, please find attached a letter responding to the NOP for the proposed 1450 Gardena project. A response indicating receipt would be appreciated.

Cheers

7 July 2023

City of Gardena
Attn: Amanda Acuna, Senior Planner
1700 West 162nd Street
Gardena, CA 90247
Submitted via email to aacuna@cityofgardena.org.

Re: 1450 Artesia Boulevard Specific Plan Project Notice of Preparation (SCH #2023060263)

Dear Amanda Acuna,

I am writing to respond to the Notice of Preparation which was made available for the proposed 1450 Artesia Boulevard Specific Plan Project which would be built there in Gardena. After reviewing the documents, I am providing the following comments.

As described in section 1.2.3 Surrounding Land uses, the Dominguez Channel forms the southern boundary of the Project property. Based on the Los Angeles County Bicycle Master Plan, the Dominguez Channel is also on of the locations planned for a Class I bike facility. Based on information from mapping services as of April 2022, that path does not currently exist.

Therefore, to make sure that the Project does not conflict with the bicycle plan, the Project should be conditioned to provide it along the portion of the Channel adjacent to the property and should be studied as part of the EIR process. This situation should be treated just like other transportation improvements being required (e.g. "traffic improvements" referenced in the Project Features portion of section 1.4 Project Characteristics), something which other communities all around the region already do. (For example, Figures 3 & 4 show a portion of a path which the City of Redlands required a recently completed warehouse development to construct as part of that project.) This can be part of reducing Project VMT by providing an alternative way to travel to work.

Additionally, the Torrance Industrial Lead tracks along Normandie Avenue could present a challenge to train continuity to the east. An ideal solution would be to provide a grade crossing that aligns with the existing crosswalk on the south leg of the intersection at Cassidy Street as that would be the most straightforward and elegant solution to provide a seamless experience for trail users. However, while far less optimal, connectivity across the tracks could also be provided by routing the trail along the east side of the Project property to the existing railroad crossing at Artesia Boulevard. If that option were used, then the EIR needs to consider it too.

Finally, given that there is already a plan in place for co-use of the Project's parking lot for other City functions, the potential for allowing trail users to be able to park there and providing a modest trailhead with bike racks, benches, water fountains, and a source of shade should be explored.

Thank you for taking the time to receive these comments and if there are any questions, please do not hesitate to contact me for more information.

Sincerely,

Marven E. Norman
PO Box 1147
San Bernardino, CA 92402

CC: SBBC+

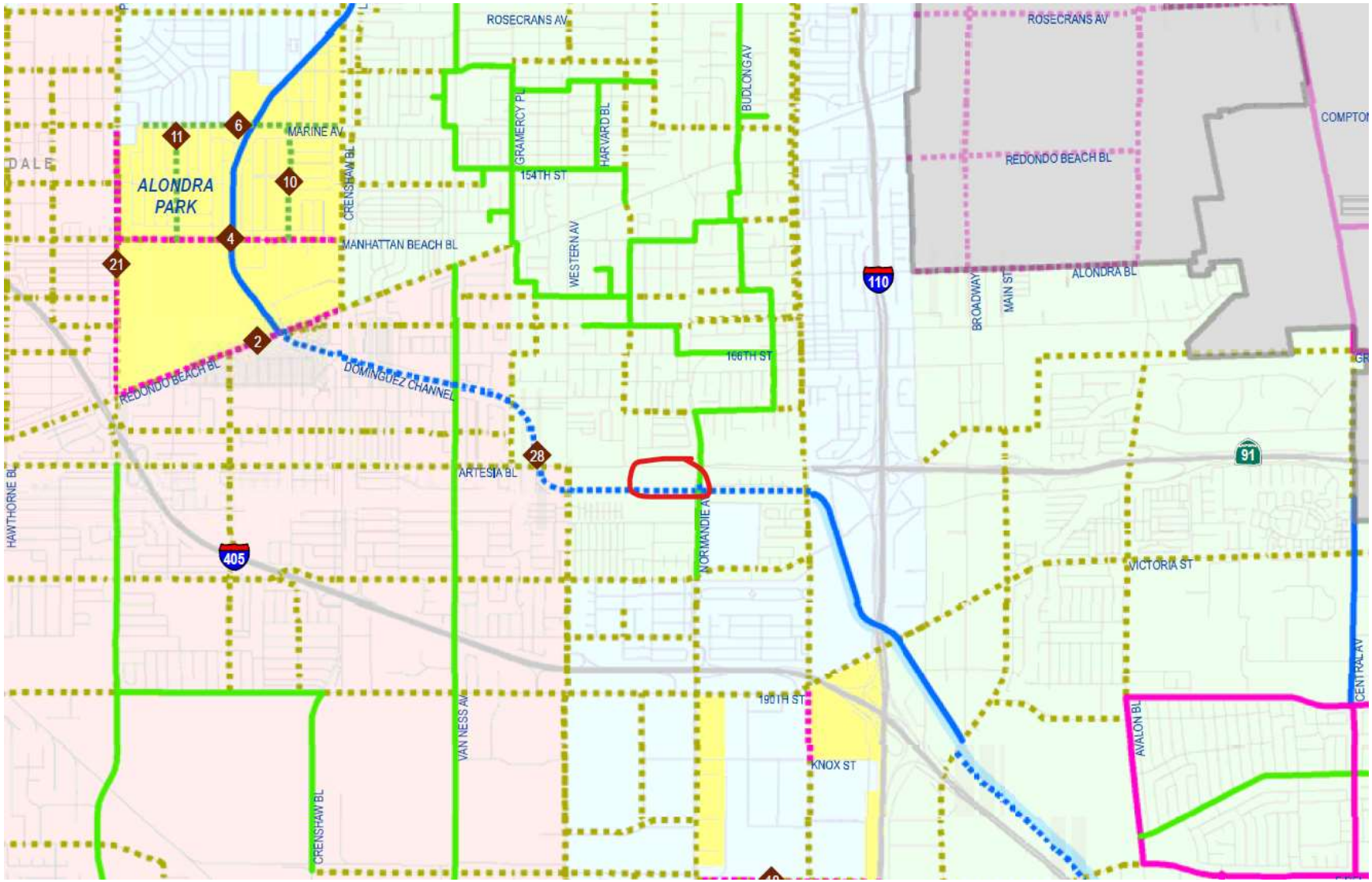

Figure 1: A portion Figure 3-30: South Bay Planning Area Proposed Bicycle Facilities from the Los Angeles County Bicycle Master Plan with the area of the proposed Project identified.

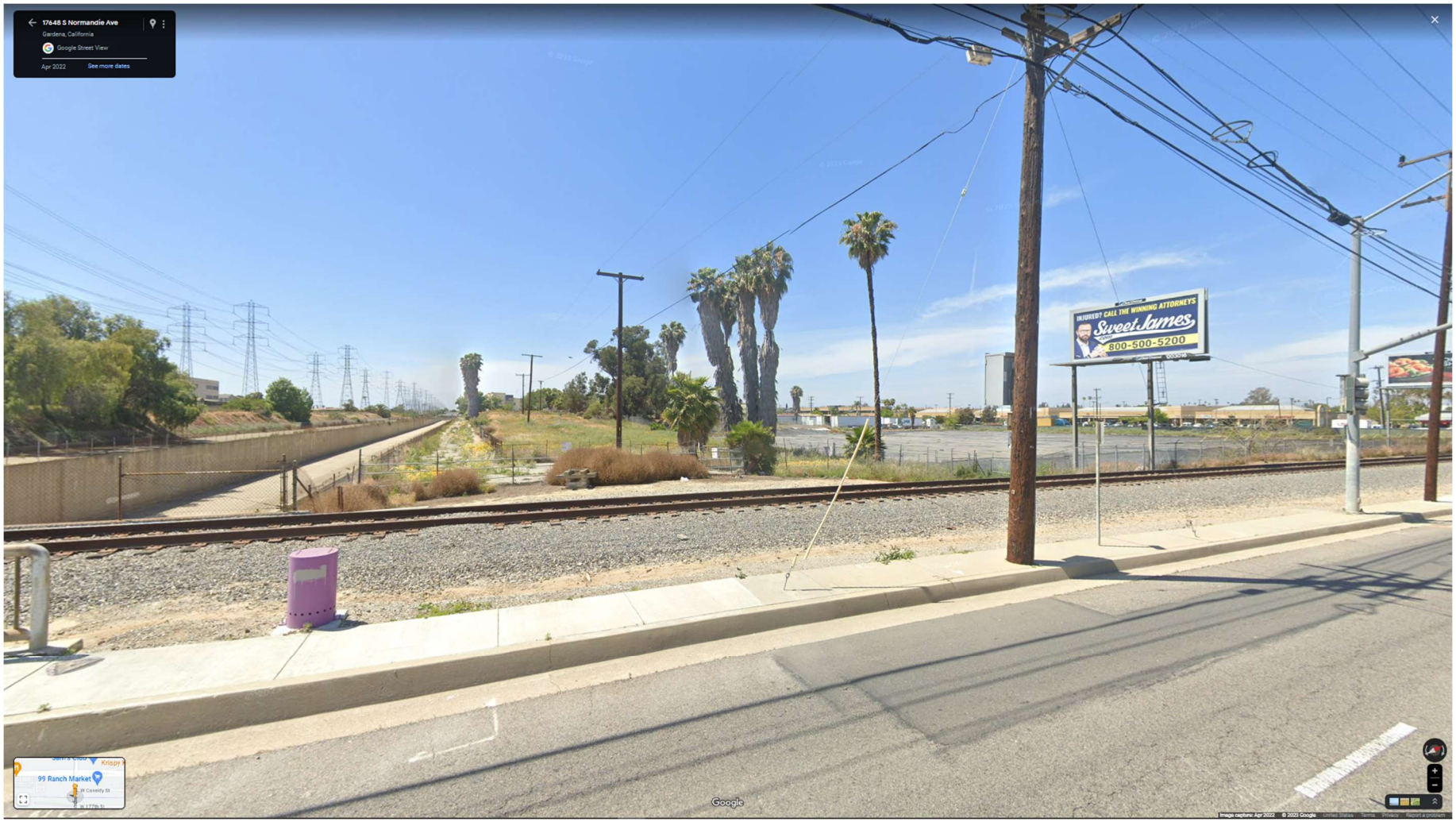

Figure 2: Screenshot of Google Streetview imagery from April 2022 looking west from Normandie Avenue at the Dominguez Channel at the Project property which shows no trail existing at that time.

Figure 3: View of a segment of the Orange Blossom Trail which the City of Redlands conditioned the adjacent warehouse development to construct as part of that project.

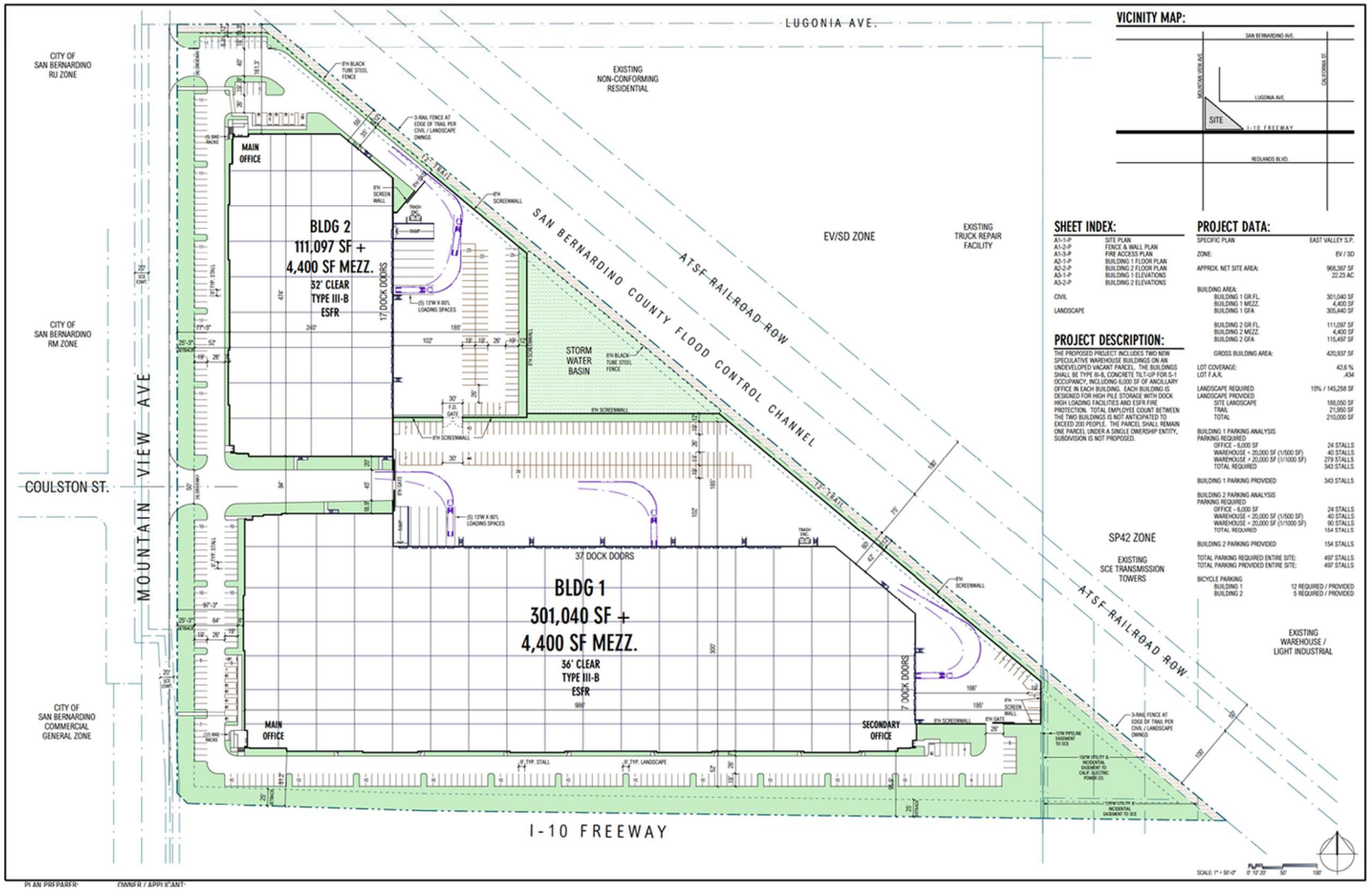

Figure 4: Mountain View Site Schematic Site Plan from Attachment B: Project Plans from July 20, 2021, City of Redlands City Council meeting agenda[1] which includes the path (called "trail") which the development was required to construct with the project.

[1] https://destinyhosted.com/redladocs/2021/CC/20210720_246/3422_3422_Attachment_B_-_Project_Plans.r.pdf

City of Gardena - 1450 Artesia Blvd Scoping Meeting

Name	Email	Phone	Address	Check to receive notifications
Haley Henderson	mshaleyhenderson@gmail.com	4243408523	13111 Daphne Ave gardena 90249	
Ryan Henderson	Marcal Mayehenderson6h@gmail.com	310 629 1124	13111 Daphne Ave Gardena 90249	✓
Kaiya Maye	Kaiyadmaye@gmail.com	214-578-2776	12920 Daphne Ave Gardena 90249	
Deryl Henderson	Deryl Henderson93@gmail	310 889-5732	13111 DAPHNE AVE GARDENA, CA	
Tuck Lye	TuckHLye@gmail.com			
Steve Alexande	ALEXANDERCHRISTY@AOL.COM	310 909 1857	2914 W 179TH ST	
Jules Kanhan	JKanhan@gmail.com	310-227-9121	2908 W 132nd PL	